



engageok | **FEDERAL PROGRAMS
SUMMIT**

Consolidated Monitoring FY 2020

Overview

- What is Consolidated Monitoring?
- Who gets monitored?
- Desk Monitoring or Site Monitoring
- The Monitoring Process and Timeline
- The Toolkit and Checklist
- The Monitoring Tool
- Outcomes
- Suggestions
- Question Time

What is Consolidated Monitoring?

- The United States Department of Education (USDE) requires that all Local Education Agency (LEA) sub-recipients of federal funds participate in a monitoring process to ensure accountability.
- Through the monitoring process the Oklahoma State Department of Education's Office of Federal Programs verifies that federal requirements are being met by the state's schools and LEAs.
- The monitoring process also provides an opportunity for OSDE to provide technical assistance and guidance to LEAs in order to strengthen their program administration and improve the quality of their programs.

Who gets monitored?

- All LEAs that receive federal funds are monitored at least once during a three-year cycle. FY20 is the second year of the current cycle.
- Furthermore, through a risk-assessment process all LEAs are scored on a number of factors indicating elevated risk in the management of federal funds.
- LEAs identified as representing an elevated risk in the management of funds are then added to the current rotation.

Desk Monitoring or Site Monitoring

- All LEAs to be monitored this year received notification on July 30, 2020 whether they would be **Desk Monitored** or **Site Monitored**.
- **Desk monitored** LEAs are required to submit the monitoring tool and supporting documentation on a flash drive postmarked no later than **December 2, 2019**.
- All LEAs being **site monitored** will submit the same documentation as those being desk monitored.

Site Visits

- Site monitored LEAs will also be contacted individually in order to arrange a site visit by OSDE staff, who will conduct a series of interviews with local personnel.
- The LEA will be notified *informally* of potential compliance issues during an Exit Conference, which will conclude the site visit.
- *Formal* notification of compliance or non-compliance will follow the complete review of the Monitoring Tool.

The Monitoring Process and Timeline

- As mentioned above, all monitored LEAs are required to save the monitoring tool and supporting documentation on a flash drive and send it to the Office of Federal Programs, postmarked no later than **December 2, 2019**.
- The reviewer assigned to the LEA will evaluate the documentation and add explanatory comments on the monitoring tool. When a first review is completed, the reviewer will return the monitoring tool to the LEA along with any requests for further or alternative documentation.

The Monitoring Process (cont.)

- The LEA will then return the monitoring tool with the requested documentation. Since there should be much less material to submit at this point, LEAs are allowed to submit documentation directly to the reviewer by email.
- Depending on the quality of the documentation, there could be several such exchanges between reviewer and LEA.
- This process closes on **April 13, 2020**. In other words, the Office of Federal Programs must have received satisfactory documentation for all relevant points on the Monitoring Tool by this date for the LEA to be considered compliant.

The Toolkit and Checklist

Oklahoma State Department of Education
Office of Federal Programs

Federal Programs Consolidated Monitoring Resource Toolkit

2019-2020

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FY2020 CONSOLIDATED MONITORING SUPPORTING DOCUMENT CHECKLIST

I. Transparent Accountability

<input type="checkbox"/>	1. CFR1a	Inventory procedures
<input type="checkbox"/>	2. CFR1b	Inventory list of equipment and computer devices
<input type="checkbox"/>	3. CFR2a	Cost allowance procedures
<input type="checkbox"/>	4. CFR3a	Financial management system procedures
<input type="checkbox"/>	5. CFR4a	Cash management procedures
<input type="checkbox"/>	6. CFR5a	Internal control procedures
<input type="checkbox"/>	7. CFR6a	Procurement transaction procedures
<input type="checkbox"/>	8. CFR7a	MCE procedures
<input type="checkbox"/>	9. CFR8a	Compensation policy
<input type="checkbox"/>	10. CFR9a	Comparability procedures
<input type="checkbox"/>	11. PPR1a	Time Distribution Records procedures
<input type="checkbox"/>	12. PPR1b	Sample Time Distribution records
<input type="checkbox"/>	13. PPR2a	Professional Development procedures/program
<input type="checkbox"/>	14. PPR3a	Record management procedures
<input type="checkbox"/>	15. PPR4a	Travel policy
<input type="checkbox"/>	16. PPR5a	Federal Programs complaint policy
<input type="checkbox"/>	17. PPR6a	Military Recruiter Access policy
<input type="checkbox"/>	18. PPR7a	OIG hotline posting
<input type="checkbox"/>	19. PPR8a	Report Card Dissemination
<input type="checkbox"/>	20. PPR9a	Conflict of Interest policy
<input type="checkbox"/>	21. PPR9b	Mandatory disclosure of violations
<input type="checkbox"/>	22. PPR10a	Tribal Consultation Agreement or Waiver

II. Program Effectiveness and Student Achievement

<input type="checkbox"/>	23. SID1a	Targeted Assistance eligibility criteria
<input type="checkbox"/>	24. SID2a	Procedures for identifying English Learners
<input type="checkbox"/>	25. SID3a	WIDA screener list
<input type="checkbox"/>	26. SID3b	WIDA certified staff
<input type="checkbox"/>	27. SID4a	Parents-Right-to-Know EL letter
<input type="checkbox"/>	28. SID5a	List of all monitored EL students
<input type="checkbox"/>	29. SID6a	Homeless enrollment form
<input type="checkbox"/>	30. SID6b	Homeless Identification Assistance

The Monitoring Tool

Consolidated Federal Programs Monitoring – F Y 2020

LEA INFORMATION TABLE

LEA Name: Enter LEA Name Here.	County code: Enter County Code Here.	District code: Enter District Code Here.
LEA Superintendent Name: Enter Name Here.	Phone: Enter Phone Number Here.	E-mail: Enter E-mail Address Here.
LEA Federal Programs Officer Name: Enter Name Here.	Phone: Enter Phone Number Here.	E-mail: Enter E-mail Address Here.
LEA School Board President Name: Enter Name Here.	Phone: Enter Phone Number Here.	E-mail: Enter E-mail Address Here.
<input type="checkbox"/> By checking the box, the Superintendent certifies that, to the best of his/her knowledge, the information provided in this monitoring tool is true and accurate.		

FEDERAL PROGRAM KEY – OSDE use only							
● Title I-A Improving Basic Programs	<input type="checkbox"/>	● Title I-A Neglected	<input type="checkbox"/>	● Title I-C Education of Migratory Children	<input type="checkbox"/>	● Title I-D Neglected, Delinquent, or At-Risk	<input type="checkbox"/>
● Title II-A Supporting Effective Instruction	<input type="checkbox"/>	● Title III-A Language Instruction for English Learners & Immigrant Students	<input type="checkbox"/>	● Title IV-A Student Support & Academic Enrichment	<input type="checkbox"/>	● Title V-B Rural Education Initiative	<input type="checkbox"/>
● Title IX-A Homeless Children and Youth	<input type="checkbox"/>	● Equitable Services Nonpublic School Students	<input type="checkbox"/>	○ This indicator applies to all LEAs	<input type="checkbox"/>	○ Corrective Action Plan (CAP)	<input type="checkbox"/>

The Monitoring Tool (cont.)

Office of Federal Programs
Consolidated Federal Programs Monitoring – FY 2020

I. Transparent Accountability

Indicator # Program(s)	Indicator Citation	Supporting Documents and Resources	Met requirements			Comments
			YES	NO	NA	Reviewer:
Cross-Cutting Fiscal Requirements –Policies and Procedures. (Note: All LEA policies shall be board approved prior to submission to OSDE.)						
CFR 1 Files: 1.CFR1a 2.CFR1b	<p>The LEA has a current inventory of any materials purchased with Federal funds. [2 CFR Parts 200.33, 200.94; and 200.20]</p> <p>Definitions: <u>Equipment</u> means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the District for financial statement purposes or \$5000. [2 CFR Part 200.33]</p> <p><u>Supplies</u> means all tangible personal property other than those described in Uniform Guidance 2 CFR Part 200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the District for financial statement purposes or \$5000, regardless of the length of its useful life. [2 CFR Part 200.94]</p> <p><u>Computing devices</u> means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories for printing, transmitting and receiving, or storing electronic information. [2CFR Part 200.20]</p> <p>LEAs must maintain effective control over, and accountability for, all funds, property, and other assets. [2 CFR Part 200.302]</p>	<p>a. Submit to OSDE: LEA's written inventory procedures, including the following: 1) process performed when inventory is received; 2) process describing what type of property is tagged and what position/office performs the tagging; 3) process to adjust the inventory records in the event the property is sold, lost, or stolen, or cannot be repaired; and 4) process describing how the physical inventory is performed.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
		<p>b. Submit to OSDE: Previous and current fiscal year (if applicable) inventory list of equipment and computer devices. Note: For each equipment and computing device (assets) purchased with Federal funds, the following information is maintained:</p> <ul style="list-style-type: none"> • Serial number or other identification number; • Source of funding for the property, including FAIN# (Federal Award Identification Number); • Who holds title; • Acquisition date • Cost of the property; • Percentage of Federal participation in the projects costs for the Federal award under which the property was acquired; • Location, use and condition of the property; and • Any ultimate disposition data including the date of disposal and sale price of the property. <p>[2 CFR part 200.313(d)(1)]</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CFR 2 File: 3.CFR2a	<p>LEAs must expend and account for Federal funds in accordance with Federal and State laws and procedures for expending and accounting for these funds. LEA's accounting systems must satisfy Federal and State requirements regarding the ability to track the use of funds and permit the disclosure of financial results. LEAs must have written procedures for determining cost allowability and must have effective control over all funds. [2 C.F.R. 200.302(b)(7); EDGAR 34 C.F.R. 76.702]</p>	<p>a. Submit to OSDE: LEA's written cost allowability procedures.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

The Monitoring Tool (cont.)

Office of Federal Programs
Consolidated Federal Programs Monitoring – FY 2020

<p>CFR 3 File: 4.CFR3a</p>	<p>○</p>	<p>The state's and the other non-Federal entity's financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the Federal award, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award. [2 C.F.R. 200.302(a)]</p>	<p>a. Submit to OSDE: LEA's written procedures for the use of the financial management system, to include: 1) the process of identifying obligated funds and unobligated balances (carryovers), and how these are tracked by the internal accounting system; 2) who tracks expenditures; 3) who draws down funds; 4) who deposits the checks. 5) the process of identifying any interest earned. (For example, if the LEA accidentally requested more than what was expended, then excess funds will be sitting in the LEA's account, possibly earning interest. If this is the case, this must be reported to the SDE). Important Note: Generally, an LEA should not earn interest because LEAs receive payments from the SDE on a reimbursement basis.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	
<p>CFR 4 File: 5.CFR4a</p>	<p>○</p>	<p>LEAs must have written procedures for payment systems. LEAs are generally required to minimize the time elapsing between transfer of funds from U.S. or State Treasury and disbursement. [2 C.F.R. 200.302(b)(6); 2 C.F.R. 200.305(b)]</p>	<p>a. Submit to OSDE: LEA's cash management written procedures to implement the requirements of payments.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	
<p>CFR 5 File: 6.CFR5a</p>	<p>○</p>	<p>The non-Federal entity must 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. These internal controls should be in compliance with guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States and the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). [2 C.F.R. 200.303]</p>	<p>a. Submit to OSDE: LEA's internal control written procedures to include how the LEA: a) manages the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award; b) evaluates itself to meet compliance with statute, regulations and the terms and conditions of Federal awards; c) takes prompt action when instances of noncompliance are identified including noncompliance identified in audit findings; d) protects and safeguards PII (Personally Identifiable Information) from all sources – LEA personnel, student data, teacher data, etc.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	
<p>CFR 6 File: 7.CFR6a</p>	<p>○</p>	<p>The non-Federal entity must use its own documented procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this section. [2 C.F.R. 200.318; 2 C.F.R. 200.319; 2 C.F.R. 200.320(d)(3)]</p>	<p>a. Submit to OSDE: LEA's written procedures for procurement transactions, including vendor selection process. The procedures shall also describe the method(s) of procurement chosen by the LEA in regards to: a) micro-purchases; b) small purchases ; c) sealed bids; d) competitive proposals (including evaluation criteria); e) and non-competitive proposals.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	

The Monitoring Tool (cont.)

<p>CFR 7 File: 8.CFR7a</p>	<p>○</p>	<p>Each LEA shall have either the combined fiscal effort per student or the aggregate expenditures of the LEA and the State with respect to the provision of free public education by the agency for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year. <i>[ESSA, Section 8521]</i></p>	<p>a. Submit to OSDE: LEA's written procedures the LEA has in place to meet compliance with MOE requirements.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	
<p>CFR 8 File: 9.CFR8a</p>	<p>○</p>	<p>Compensation for personal services includes <u>all</u> remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the Federal award, including but not necessarily limited to wages and salaries. (1) Is reasonable for the services rendered and conforms to the established written policy of the non-Federal entity consistently applied to both Federal and non-Federal activities; (2) Follows an appointment made in accordance with a non-Federal entity's laws and/or rules or written policies and meets the requirements of Federal statute, where applicable; and (3) Is determined and supported as provided in paragraph (i) of this section, Standards for Documentation of Personnel Expenses, when applicable. <i>[2 CFR 200.430(a)-(f)]</i></p>	<p>a. Submit to OSDE: LEA's written Compensation Policy describing how <u>all</u> remuneration (including but not limited to wages and salaries, benefits, incentives, stipends, tuition reimbursement, etc.): a) is reasonable for the services rendered; b) conforms to the established written policy consistently applied to both Federal and non-Federal activities; c) follows an appointment (position) established by the LEA; d) is determined and supported as provided in paragraph (i) of this section, Standards for Documentation of Personnel Expenses, when applicable; e) is reasonable to the extent that compensation for employees engaged in work on Federal awards is consistent with that paid for similar work in other activities of the non-Federal entity; <i>Note: A cost is reasonable if:</i></p> <ul style="list-style-type: none"> • in its nature and amount, does not exceed the market prices for comparable goods or services for the geographic area; • does not exceed what would be incurred by a prudent person; • meets requirements imposed by such factors as: sound business practices; arm's-length bargaining; Federal, state and other laws and regulations; and terms and conditions of the Federal award or State Aid Act. <i>[2 C.F.R. 200.404]</i> 	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	
<p>CFR 9 File: 10.CFR9a</p>	<p>○</p>	<p>The LEA meets comparability requirements. <i>[ESSA, Section 1118(c)(1)(A)]</i></p>	<p>a. Submit to OSDE: LEA's written comparability procedures (if applicable).</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	
<p>Policies, Procedures and Requirements</p>							
<p>PPR 1 Files: 11.PPR1a 12.PPR1b</p>	<p>○</p>	<p>Charges to Federal awards for salaries and wages, including stipends, must be based on records that accurately reflect the work performed. <i>[2 CFR 200.430(i)]</i></p>	<p>a. Submit to OSDE: LEA's written procedures for Time Distribution Records which must :</p> <p>(i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated; (ii) Be incorporated into the official records of the non-Federal entity; (iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities; (iv) Encompass both federally assisted and all other activities compensated by the non-Federal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity's written policy; (v) Comply with the established accounting policies and practices of the non-Federal entity</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	

The Monitoring Tool (cont.)

			<p>(vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.</p> <p>(viii) Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes.</p>				
			<p>b. Submit to OSDE: Sample Time Distribution Records. <i>Note: The OSDE reviewer will notify the LEA which federally paid personnel were randomly selected to have their time and effort records submitted for audit. Site monitored LEAs shall provide the records for all federally paid personnel at the time of the site visit.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>PPR 2 File: 13.PPR2a</p>	○	<p>It is the intent of the Legislature to establish a professional development procedure whereby all teachers in the state continue their education beyond initial certification by the state to ensure that the children of the state are taught by professional educators, fully prepared in their areas of expertise. Furthermore, such professional development procedure shall provide alternative means of education, including one or more of the following: In-service programs, higher education courses, or other alternative means of education designed to help teachers enrich their professional abilities. <i>[O.S. 70-6-192]</i></p> <p>The district boards of education of this state shall establish professional development programs for the certified teachers and administrators of the district. Programs shall be adopted by each board based upon recommendations of a professional development committee appointed by the board of education for the district. <i>[O.S. 70-6-194]</i></p>	<p>a. Submit to OSDE: LEA's written Professional Development procedures and current Professional Development Program. <i>Note:</i> In developing program recommendations, each professional development committee shall annually utilize a data-driven approach to analyze student data and determine district and school professional development needs. The professional development programs adopted shall be directed toward development of competencies and instructional strategies in the core curriculum areas for the following goals:</p> <p>a) increasing the academic performance data scores for the district and each school site; b) closing achievement gaps among student subgroups; c) increasing student achievement as demonstrated on state-mandated tests and the ACT; d) increasing high school graduation rates; and e) decreasing college remediation rates.</p> <p>Each program may also include components on classroom management and student discipline strategies, outreach to parents, guardians or custodians of students, special education, and racial and ethnic education, which all personnel defined as teachers in Section 1-116 of this title shall be required to complete on a periodic basis. <i>[O.S. 70-6-194]</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>PPR 3 File: 14.PPR3a</p>	○	<p>The LEA maintains original records. If records are electronic, there is no need to create and retain paper copies. Both types of records may be subject to periodic quality control reviews. <i>[2 CFR 200.335]</i></p>	<p>a. Submit to OSDE: LEA's written procedures for maintaining and storing original records, both paper and electronic. Procedures must include reasonable safeguards for ensuring that the records are not altered.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>PPR 4 File: 15.PPR4a</p>	○	<p>Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-Federal entity. Such costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to an entire trip and not to selected days of the trip, and results in charges consistent with those normally allowed</p>	<p>a. Submit to OSDE: LEA's written Travel Policy (including travel/dependent care costs, reimbursement, etc.).</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

The Monitoring Tool (cont.)

<p>PNASE 7 File: 47.PNASE7a</p>	<p>○</p>	<ul style="list-style-type: none"> LEAs must use Title III funds to provide effective professional development for teachers and principals of ELs that is: <ul style="list-style-type: none"> Designed to improve the instruction and assessment of ELs; Designed to enhance the ability of teachers and principals to understand and implement curricula, assessment measures and practices, and instructional strategies for ELs; Effective in increasing children’s English language proficiency or substantially increasing the subject matter knowledge, teaching knowledge, and teaching skills of teachers of ELs; and Of sufficient intensity and duration to have a positive and lasting impact on the teachers’ performance in the classroom. This does not include one-day or short-term events, unless as part of a teacher’s comprehensive professional development plan that is based on a needs assessment. <i>[ESSA, Section 3115(c)(2)]</i> 	<p>a. Submit to OSDE: Evidence of EL professional development (PD) for teachers and principals (e.g. agendas and sign-in sheets, provider invoices, training descriptions, etc.).</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>PNASE 8 Files: 48.PNASE8a 49.PNASE8b</p>	<p>○</p>	<p>The LEA has designated an <i>appropriate</i> staff person as the liaison for homeless children and shall inform school personnel, service providers, advocates working with homeless families, parents and guardians of homeless children and youths, of the duties required of the liaison <i>[McKinney-Vento Homeless Assistance Act, Section 722; Title 42 U.S.C. §11432 (1)(j)(ii)]</i> Liaison shall ensure that school personnel providing services under this subtitle receive professional development and other support. <i>[McKinney-Vento Homeless Assistance Act, Section 722; Title 42 U.S.C. §11432(g)(1)(D)]</i></p>	<p>a. Submit to OSDE: Evidence of dissemination of homeless liaison’s duties and the requirements of Title IX-A Homeless Education (e.g. posters, website screenshots, etc.). <i>[ESSA, Section 9102/McKinney-Vento Homeless Assistance Act, Sec. 722(g)(6)(A)(ix)]</i></p> <p>b. Submit to OSDE: Evidence (e.g. agendas and sign-in sheets) of homeless education training for staff in Title I A schools, and non-Title I A schools regarding identification of homeless students.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>PNASE 9 File: 50.PNASE9a</p>	<p>○</p>	<p>The LEA ensures that the homeless liaison participates in professional development and other technical assistance activities. <i>[McKinney-Vento Homeless Assistance Act, Section 722; Title 42 U.S.C. 11432(j)(iv)]</i></p>	<p>a. Submit to OSDE: Evidence of homeless liaison participation in training(s), webinars and other professional development (e.g. agendas, brochures, etc.) <i>[ESSA, Section 9102/McKinney-Vento Homeless Assistance Act, Sec. 722(j)(iv)]</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>PNASE 10 File: 51.PNASE10a</p>	<p>○</p>	<p>LEA ensures homeless children have access to public preschool programs, as provided to other children in the State; Homeless and Runaway youth as well as youths separated from public schools are identified and accorded equal access to appropriate secondary education and support services. Including by identifying and removing barriers that prevent youths from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies. <i>[McKinney-Vento Homeless Assistance Act, Sec. 722; Title 42 U.S.C. §11432(g)(1)(F)(i)(iii)]</i> The <i>policy</i> includes assurance that homeless children and youth are not stigmatized or segregated and ensure that transportation is provided at the request of parent/guardian to and from the school of origin. <i>[McKinney-Vento Homeless</i></p>	<p>a. Submit to OSDE: LEA homeless student written policy that:</p> <ul style="list-style-type: none"> describes the rights of homeless students and the requirements of the LEA in serving these students; includes the rights of homeless children and youth, definitions, identification, school selection, disputes, services, free meals, staff training, program coordination, preschool access, full or partial credit accrual, dissemination of educational rights, etc.; includes assurance that homeless children and youth are not stigmatized or segregated and ensures that transportation is provided at the request of parent/guardian to and from the school of origin; removes barriers of homeless students’ access to academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, on-line learning, and charter school programs. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

The Monitoring Tool (cont.)

PFE 11 Files: 102.PFE11a 103.PFE11b	TIIIA 	parents, LEA and higher education staff, and community agencies/groups participate in developing and implementing the EL program and if applicable, coordinate with local Head Start and Early Head Start agencies, including migrant and seasonal Head Start, and other early childhood education providers. <i>[ESSA Section 3116(b)(4)(C)(D)]</i>	a. Submit to OSDE: Agendas and minutes from meetings that included parents, LEA and higher education staff, and community agencies/groups participating in developing and implementing the EL program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			b. Submit to OSDE: Signed attendance sheets from meetings regarding the development and implementation of the EL program with participant names and roles/affiliations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PFE 12 104.PFE12a 105.PFE12b	TIIIA 	An eligible entity receiving funds under section 3114(d)(1) shall use the funds to pay for activities that provide enhanced instructional opportunities for immigrant children and youth, which may include family literacy, parent and family outreach, and training activities designed to assist parents and families to become active participants in the education of their children. <i>[ESSA, Section 3115(e)(1)(A)]</i>	a. Submit to OSDE: Evidence of outreach invitations to and activities for the parents of immigrant children (e.g. email, invitations, flyers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			b. Submit to OSDE: Evidence of Parent and Family Engagement Educational Activities for parents of immigrant students (PowerPoints, handouts, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PFE 13 106.PFE13a 107.PFE13b	TIIIA 	An eligible entity receiving funds under section 3114(d)(1) shall use the funds to pay for activities that provide enhanced instructional opportunities for immigrant children and youth, which may include family activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents and	a. Submit to OSDE: Evidence of outreach invitations and activities coordinated between the LEA and community based organizations to assist parents of immigrant children (e.g. agendas, minutes, flyers, emails).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			b. Submit to OSDE: Signed attendance sheets of activities coordinated between the LEA and community based organizations to assist parents of immigrant children.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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		families of immigrant children and youth by offering comprehensive community service <i>[ESSA, Section 3115(e)(1)(G)]</i>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certification and Qualifications – Teachers and Paraprofessionals						
CQ 1 Files: 108.CQ1a (see instructions)		The LEA will ensure that all teachers and paraprofessionals working in a program supported with Title I funds meet applicable State certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification. <i>[ESSA, Section 1111 (g)(2)(I)]</i> Note: This is applicable to all Schoolwide and Targeted Assistance programs.	a. Submit to OSDE: Credentials for Paraprofessionals working in all Title I, Part A sites, regardless of the funding source of their salaries. Note: The OSDE reviewer will notify the LEA which paraprofessionals were randomly selected to have their credential records submitted for audit.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



The Monitoring Tool (cont.)

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VI. OSDE Review Records

OSDE USE ONLY	
Reviewer's signature: <i>Type /s/Name Here.</i>	Return Date: Click here to enter a date.
Reviewer's signature: <i>Type /s/Name Here.</i>	Return Date: Click here to enter a date.
Reviewer's signature: <i>Type /s/Name Here.</i>	Return Date: Click here to enter a date.
Reviewer's signature: <i>Type /s/Name Here.</i>	Return Date: Click here to enter a date.

VII. Final Monitoring Results

OSDE USE ONLY	
LEA Submitted All Applicable Requested Documentation: <i>Choose an item.</i>	
Reviewer's signature: <i>Type /s/Name Here.</i>	Date: Click here to enter a date.
Supervisor's signature: <i>Type /s/Name Here.</i>	Date: Click here to enter a date.

Outcomes

- **Compliance**

The desired outcome. When the Office of Federal Programs has received and approved all relevant documentation (before April 13, 2020) a compliance letter will be sent to the LEA together with a copy of the Monitoring Tool Checklist and the final version of the Monitoring Tool.

(in a hushed tone) The Other Outcome

- **Non-compliance**

If the Office of Federal Programs has not received all relevant documentation by **April 13, 2020** the LEA will be found to be non-compliant and will receive a non-compliance letter.

If an LEA is found to be non-compliant, reimbursement of all federal funds will be withheld for the remainder of the current fiscal year.

The Other Outcome (cont.)

Non-compliant LEAs will have thirty (30) calendar days to submit a Corrective Action Plan for each missing or unacceptable item.

Once the Corrective Action Plans have been received and approved by OSDE, that LEA's federal funds for the remainder of the current fiscal year will be released.

A failure to submit Corrective Action Plans within thirty (30) days could result in the withholding of federal funds both for the current and the following fiscal year, at OSDE discretion.

Suggestions

- **Designate a manager** – If possible, assign one person with thorough knowledge of district operations and strong organizational skills to manage the monitoring process.
- **Start early** – Identify and assign district staff to be responsible for specific requirements and meet on a consistent schedule to better ensure accountability.
- **Be specific** – Especially when creating or reviewing procedures, identify specific steps in your local processes and the specific positions responsible for implementation.
- **Be thorough** – Since the Monitoring Tool is no longer divided by Title programs, make sure that every section is reviewed to ensure that you have submitted all required documentation.
- **Ask questions** – Use your reviewer as a resource. If you're unsure what an indicator is asking, it is better to ask and submit the correct documentation than to have to return to it and have to correct it later.

Questions?

In Closing

If you have any further questions about the monitoring process or about any individual items on the Monitoring Tool, please do not hesitate to contact me or your assigned reviewer.

Thomas Kirk

Programs Manager

405-521-4878

Thomas.Kirk@sde.ok.gov

