

Oklahoma State Department of Education



Oklahoma State Plan For Federal Programs Consolidated Monitoring

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Oklahoma State Plan

For

Federal Programs Consolidated Monitoring

Overview

Pursuant to Code of Federal Regulations (CFR) 200.331 monitoring and reporting program performance, Grantees are responsible for managing the day-to-day operation of grant and subgrant supported activities to assure compliance. It is the grantee's responsibility to ensure that federal funds are spent according to the prescribed federal program requirements. All local educational agency (LEA) subrecipients receiving federal funds must participate in a monitoring review process required by the United States Department of Education (USDE) as an accountability component *P.L. 107-110 No Child Left Behind Act of 2001* (NCLB) and the Elementary and Secondary Education Act (ESEA) Flexibility Waiver. The provision of federal grant monitoring enables State Educational Agencies (SEA) to work collaboratively with LEAs by providing them with high quality technical assistance for fiscal and programmatic planning and implementation of all services provided for students, teachers, and principals, on behalf of their federally funded programs.

The Oklahoma State Department of Education (OSDE) and LEA subrecipients must comply with the Federal Single Audit Act and testing of expenditures in accordance with the CFR 200.501. OSDE has a comprehensive program and fiscal management monitoring plan for subrecipients of federal funds. The LEA subrecipients must submit for approval an annual budget through the Consolidated Application before funds can be expended. OSDE staff review the budget submitted by the LEA to determine if funds are appropriately budgeted according to grant guidelines. An approved application, properly signed and funded under the provisions of the *P.L. 107-110 No Child Left Behind Act of 2001 (NCLB)*, constitutes a contractual agreement between the OSDE and the LEA.

OSDE staff provides technical assistance regarding laws and regulations throughout the monitoring process. Technical assistance serves the purpose of assisting LEAs in reaching and maintaining compliance.

The Office of Federal Programs monitoring review plan includes the following grant programs:

- Title I, Part A, Improving the Academic Achievement of the Disadvantaged
- Title I, Part D, Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk
- Title I, Part C, Education of Migratory Children
- Title II, Part A, Improving Teacher and Principal Quality
- Title III, Part A, Language Instruction for Limited English Proficient and Immigrant Students
- Title VI, Part B, Rural Education Achievement Program (REAP) and Rural Low-Income Program (RLIS)
- Title X, Part C, McKinney-Vento Homeless Education Assistance Act of 2001

LEAs are required to provide evidence of compliance when monitoring is performed and findings are identified. Evidence of compliance is requested by the OSDE staff and must be submitted by the LEA in written form in accordance to the established timeline. Both the LEA subrecipient and OSDE are liable for maintaining all compliance requirements, and failure to submit all evidence may result in a finding by USDE.

For each subrecipient, OSDE staff will maintain electronic files containing copies of requested documentation for the monitoring review process. Monitoring files may also contain communication logs and email communications between OSDE staff members and LEA personnel.

LEAs will participate in the required monitoring process over a three-year monitoring cycle during which **all** LEAs will participate in either an on-site or desk review.

Subrecipient Risk Analysis Factors

Risk management is a central issue in the monitoring process. The risk analysis process emphasizes accountability and transparency for using resources wisely and focuses on the results of LEA implementation of *P.L. 107-110 of the No Child Left Behind Act of 2001 and ESEA Flexibility Waiver*. In accordance with CFR 200.205, new subrecipients and those evaluated as high risk may warrant closer monitoring.

OSDE performs a consolidated monitoring risk assessment to determine high risk LEAs. Some of the factors addressed include, but are not limited to:

- **All** LEAs are monitored on a three year cycle
- LEAs with greater percentages of awarded funds
- LEAs that did not meet Maintenance of Effort (MOE)
- LEAs that lost carryover funds (2nd year and 1st year excess)
- LEAs that demonstrated poor planning due to multiple application revisions
- LEAs that had audit/Office of Civil Rights (OCR) findings
- LEAs for which the OSDE has received a formal legal complaint
- LEAs that were determined to be Non-Compliant in previous monitoring cycles
- LEAs that failed to meet the 100% HQ Teacher requirement
- LEAs that failed to submit required OSDE reports timely
- LEAs that experience recurring problems unique to the program

Monitoring

Monitoring is the examination of an LEAs administration and implementation of a federal education grant to ensure: 1) compliance with applicable federal requirements; and 2) that LEA performance goals are being achieved as stated in CFR 200.328.

Monitoring supports the alignment of state and local efforts with the principles of NCLB and the ESEA Flexibility Waiver. Monitoring provides the data necessary to make educational improvements and holds LEAs accountable for ensuring that all students have access to a high

quality education. OSDE's monitoring processes are designed to focus LEAs efforts when implementing the critical requirements of NCLB and the ESEA Flexibility Waiver.

Monitoring Goals

Methods for overseeing the subrecipients' compliance and performance requirements include the implementation of the Student Achievement and School Accountability Programs (SASA) Monitoring Plan for Formula Grant Programs. OSDE has developed and implemented a monitoring tool that is utilized each year to effectively monitor subrecipients. OSDE staff members are provided training on how to effectively monitor LEAs. Listed below are the major goals included in OSDE's monitoring process:

- To provide ongoing oversight and monitoring of federal grants
- To develop a grant monitoring program that will meet the specifics of General Statute (G.S.) 143-6.2 and CFR 200.500 along with document compliance with program requirements
- To ensure subrecipients meet the intended purposes of federal grants
- To identify and track grant compliance
- To identify the technical assistance needs of subrecipients
- To ensure timely expenditure of grant funds
- To prevent fraud and abuse
- To identify programmatic best practices

Monitoring Process

OSDE's monitoring process consists of two major components, desk and on-site reviews, that assist LEAs in their efforts to build capacity for improved student achievement and ensure program compliance. OSDE staff collects data during the desk and/or on-site reviews to determine compliance with the monitoring indicators. Monitoring outside of the scheduled cycle may be required if a LEA is identified as high risk.

Desk Review

Most LEAs to be monitored during the three year cycle are selected for desk review and receive the following items:

- Initial monitoring notification letter
- Monitoring Tool containing required documentation checklist and indicator questions
- Monitoring timeline

Each LEA is assigned to an OSDE staff member who functions as the LEA contact and is primarily responsible for providing technical assistance concerning all monitoring processes. One of the most important functions of the OSDE staff member is organizing the desk review process and performing the appropriate follow-through. Desk reviews include an examination of specific program compliance. In conducting the desk review, the LEA is required to collect, organize and submit monitoring documents to the OSDE staff member according to the established timeline.

OSDE staff performs a detailed review of all submitted monitoring documents. Documents are reviewed in alignment with SASA indicators which highly influence the results of the monitoring and are the model for accountability and transparency. OSDE staff also reviews for compliance with NCLB law and ESEA Flexibility Waiver requirements as well as the demonstration of appropriate NCLB processes within each document. If monitoring documents are found not to meet standards, some form of corrective action is required. In this case, LEAs are informed of the necessary actions they must take and they are required to submit evidence of compliance according to the established timeline. Technical assistance is offered on an on-going basis if the LEA is found to be noncompliant. OSDE staff also provides information about changes in policies and guidance in the form of technical assistance.

On-Site Review

Each LEA selected for on-site review receives the following items:

- Initial monitoring notification letter with date of on-site visit
- Monitoring Tool containing required documentation checklist and indicator questions
- Monitoring timeline

OSDE staff members are assigned to conduct on-site reviews. The number of staff assigned to perform the site visit will vary depending on the size of the LEA, issues identified, and programs applicable to the LEA. On-site monitoring will take anywhere from a few hours to multiple days as needed to appropriately monitor in regard to meeting all applicable program requirements. To prepare for an on-site review, the LEA must collect and organize all program specific documentation requested in the monitoring notification letter, and ensure that the LEA superintendent or authorized representative is available during the monitoring process.

OSDE staff will review all appropriate documentation including information requested in the monitoring notification letter, and may interview LEA staff, principals, teachers, parents, and other stakeholders, both individually and in groups, as appropriate. This multi-level interview strategy allows OSDE staff to gather information from a variety of perspectives and better evaluate the impact of the administration and the implementation of the federal programs at the LEA and site level.

OSDE staff will close with an exit conference to discuss preliminary results. After the on-site visit, the OSDE staff will offer technical assistance, as necessary, via fax, email, and phone conversations to assist the LEA in achieving compliance. OSDE staff will provide a formal monitoring report to the LEA and provide appropriate follow-up for all corrective action requirements.

LEA Response to Desk and/or Site Monitoring Recommendations:

The LEA should respond to any findings by submitting all evidence of compliance in accordance with the established timeline. Evidence of compliance is carefully reviewed by OSDE staff to ensure that all compliance issues identified in the monitoring report have been thoroughly addressed.

OSDE's Closure of the Monitoring Process

After the LEA has submitted all of the required monitoring documents, and the OSDE staff has determined the subrecipient has reached compliance status, the following documentation is sent to the LEA's superintendent or the authorized representative:

- Formal compliance letter
- Monitoring Tool indicating all areas have met requirements

If at the end of the monitoring review process, determined by a pre-established deadline, the LEA has not submitted all of the required monitoring documents/statements and the OSDE staff has determined the LEA has not reached compliant status, the LEA is subject to being re-monitored the following year and having approval of their grant applications/claims withheld until they can come into compliance in the new monitoring review process.

CFR 200.300 requires State Education Agencies to monitor their subrecipients to ensure compliance with applicable federal requirements and that performance goals are achieved.

OSDE strives to provide effective and efficient monitoring processes that will demonstrate accountability and transparency for the purpose of maintaining integrity for all federally funded programs.