

# Monitoring Overview: Foster Care and McKinney-Vento

2018 Fall Homeless Education  
Conference

September 18, 2017

Presenter:

Eric McGhee



# Monitoring Overview



# Monitoring Overview



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

## The Purpose of Monitoring

- Monitoring of federal programs is conducted to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education
- Monitoring emphasizes accountability for using federal resources wisely
- Monitoring serves as a vehicle for the Georgia Department of Education (GaDOE) to help LEAs achieve high-quality implementation of educational programs utilizing the LEAs' federal allocations

# Monitoring Overview



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

## On-site Cross-Functional Monitoring Selection

- LEAs monitored on a four-year cycle
  - (Approximately 1/4 each year)
  - **Note:** McKinney-Vento and Title I, Part D grantees monitored annually
- LEAs selected randomly
- High-risk LEAs added to current cycle
- Other LEAs as deemed necessary

# Getting Organized





# Getting Organized



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

## LEA Preparation Prior to On-Site Monitoring Visit

- Prepare file folders with tabs for each item
- Items too large to be placed in folders should be made available to GaDOE's Cross-Functional Monitoring team via Internet or website links
- Remove previous year's documents from monitoring files
  - Old files do not show compliance with program implementation for the current year, unless specifically indicated
- Seek help from your GaDOE Program Consultant if needed
- Collaborate with other related departments and personnel (Finance, Student Records, Title I Transportation)
  - Secure essential documentation
  - Hold program specific meetings
  - Conduct mock monitoring prior to the visit
  - Ensure that the Homeless Education Liaison is present on the scheduled monitoring date



# Getting Organized



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

## FY19 Monitoring [Form](#)

- Items column
- Requirements column
- Documentation on file at the LEA and/or to be uploaded as .pdf files to JotForm to verify compliance column.

**Note: JotForm is used to upload:**

- Pre-visit documents (The Grants Unit programs usually request detailed budget reports and inventory documents)
- Desktop monitoring (Instead of preparing documents for onsite visit, the LEA uploads all required documents for specified program for GaDOE staff member(s) to review)

# Getting Organized



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

## The Right Amount of Documentation

- Avoid providing the bare minimum. For example:
  - LEA does not serve subgroup B, and does not include evidence that is applicable to the subgroup
  - LEA provides one piece of evidence. This is rarely enough
- Include enough documentation to prove compliance
  - There is no "right" amount of evidence for all items; it depends on the requirement
  - A range of 3-10 evidence examples is acceptable for most indicators monitored by the Grants Unit
- All documentation should be for the current fiscal year, unless directed otherwise. For example:
  - Previous year's drawdown report that matches the DE0147 report
  - The evidence for the current year doesn't exist yet because it is scheduled to occur after the monitoring, in which case the previous year's documentation is needed
- Providing too much documentation with the hopes the reviewer will give up and assume compliance requirements have been met
  - This makes reviewers suspicious

# Preparing Evidence for Monitoring Success



Georgia Department of Education



# Common Findings

## Item 1.1



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

- Common pitfalls for 1.1:
  - Provided no documentation thinking that it did not apply to the Grants Unit
  - Provided a monitoring plan that did not include Grants Unit Programs
- Findings in this area are usually corrected if the LEA either:
  - Includes all federal programs in the LEA monitoring plan, or
  - Uses general language that applies to all federal programs
- A correctly formed monitoring plan is all that is needed to meet minimum compliance

# Preparing Evidence Item 5.1



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaode.org](http://gaode.org)

## Requirement

- 5.1a. **Evidence that all LEA Internal Controls** specific to LEA expenditures required to be in writing by 2 CFR Part 200 (Allowability, Segregation of Duties, Procurement, Technical Evaluations of Competitive Proposals, Conflict of Interest, Time and Effort, Stipends, Travel) are present and meet requirements for internal controls

## Documentation

- 5.1a. Evidence shall include internal controls required to be in writing by 2 CFR Part 200:
- a. Written Allowability Procedures - 2 CFR Sec. 200.302(b)(7)
  - b. Segregation of Duties - GAO-14-704G
  - c. Written Procurement Procedures - 2 CFR Sec. 200.319(c)
  - d. Written Method for Conducting Technical Evaluations of Competitive Proposals and Selecting Recipients - 2 CFR Sec. 200.320(d)(3)
  - e. Written Conflict of Interest Policy - 2 CFR Sec. 200.318(c)(1)
  - f. Written Personal Compensation Policies (Time and Effort to include salaries, substitutes, and stipends)- 2 CFR Sec. 200.430
  - g. Written Stipend Policy – GaDOE Rule 160-3-3.04
  - h. Written Travel Policy - 2 CFR Sec. 200.474(b)
  - i. Procedures to support suspension and debarment is checked prior to making purchases above \$25,000 threshold from single vendor (34 CFR 85.110)

Georgia Department of Education

# Preparing Evidence

## Item 5.1



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

### Requirement

**5.1b. Evidence that the LEA maintains accounting records** that are supported by source documentation and costs are allowable under applicable laws and regulations. Expenditures meet the following standards including, but not limited to:

- a. Segregation of duties in review and authorization (must include Program Coordinator).
- b. Reconciles all applicable reports – expenditure, budget, etc.
- c. Allowable under applicable laws and regulations.
- d. Prove necessary, reasonable, and allocable.
- e. Supported by source documentation.
- f. Supplement not supplant
- g. Align with approved Federal budget.
- h. Occur within the grant Period of Performance and benefits current grant period.
- i. Comply with standards of documentation of personnel expenditures (Time and Effort).
- j. Maintain oversight of contracts/purchase orders for contracted services.
- k. Avoid conflict of interest.
- l. Provides time stamped documentation of verifying vendors against suspension and debarment database
- m. Follow federal procedures and/or policies related to competition and methods of procurement.

### Documentation

1b. Evidence shall include:

- a. Copy of FY18 and FY19 Payroll & Expenditure Detail Reports for every program organized by site, function and object (if applicable, with LEA Chart of Accounts crosswalk).
- b. Copy of Source Documentation for all requested expenditures (purchase orders, invoices, contracts/ contract deliverables, agendas, receipts, travel authorizations, pre-approval, Title III funded instructors/ tutors, administrative costs), all capital
- c. Copy of FY18 and FY19 Time and Effort Records.
- d. Copy of special approval documentation (capital expenses, transfer of funds, consolidation of administrative funds, etc).
- e. Copy of single audit reports for last two years available.
- f. Copy of Resource Allocation Method/Plan (RAM/P) to meet Title I supplement not supplant.
- g. Copy of FY18 Completion Report and FY18 general ledger for each federal program
- h. Copy of completed class size reduction worksheet and teacher/grade level/content area schedule (if applicable – Title II Only)
- i. Copy of signed and time stamped documentation verifying vendors against suspension and debarment database.

# Preparing Evidence Item 5.2b.



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

## Requirement

**Internal Controls.** Evidence that the LEA manages equipment in a way that meets the following conditions:

- a. Use of the equipment for authorized purposes...
- b. Maintenance of property records to include person responsible for maintaining documentation. Purchase Orders and Inventory Records showing: item description, cost, source of funding for equipment including the Federal Award Identification Number (FAIN), date of purchase, vendor, serial number or other identification number, location, use, condition of property, and disposition data including date of disposal.
- c. Annual physical inventories and reconciliation of physical inventory with property records.
- d. Safeguards to prevent loss, damage, or theft of the property...
- e. Sale of property procedures...
- f. Disposition of equipment...

## Documentation

Evidence shall include:

- a. Copies of all purchase orders documenting purchases of equipment with federal funds.
- b. Copy of inventory records with all required component [CFR 200.313(d)]
- c. Records/logs of dates that physical inventories were conducted at LEA and schools with date, and signatures of person conducting inventory.



# Common Findings Items 5.1 and 5.2



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga DOE.org](http://ga DOE.org)

- Common pitfalls for 5.1 and 5.2:
  - Provided no documentation thinking that it did not apply to the Grants Unit
  - Provided detailed budgets that did not match approved budget or contained unallowable costs
  - Excluded one or more of the required internal control policies (e.g. Disposition, Inventory)
  - Provided inaccurate inventories or provided no proof the inventories were conducted (I.e. Description, serial number or other ID, title information, acquisition date, cost, percent of federal participation, location, use and condition, date of physical inventory and disposition, if applicable)
- Findings in these areas are usually corrected if the LEA:
  - Provides a recent detailed budget report that matches the approved budget
  - Includes all federal programs in the internal controls policies
  - Submits a complete inventory with property purchased over the last two years of the grant

# Questions for Thought



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

- Which individuals within your LEA provide the greatest levels of support when preparing for monitoring?
- How can your LEA enhance the roles played by staff to prepare for monitoring?



Georgia Department of Education

# Documentation for Education of Homeless Children and Youth (EHCY)

## Title X, Part C

Georgia Department of Education

# Documentation for EHCY



Richard Woods,  
Georgia's School Superintendent  
*"Educating Georgia's Future"*  
[gaDOE.org](http://gaDOE.org)

GaDOE will conduct onsite visits for all EHCY grantees. Grantees that are part of the Cross-Functional Monitoring (CFM) will be monitored with the GaDOE CFM team. Grantees not part of the CFM will receive a separate onsite monitoring. For all other LEAs that are part of the CFM, GaDOE will notify these LEAs if they will be monitored onsite or if a desktop monitoring will occur. LEAs should be prepared to provide evidence for the following monitoring indicators:

- 1.1 – LEA Monitoring of Schools and Programs
- 2.1 – CLIP
- 7.1 – Cost Principles
- 7.2 – Supplement not Supplant
- 7.3 – Internal Controls
- 7.4 – Cash Management
- 8.3 – LEA Reservation of Funds
- 12.1- 12.9 (All LEAs)
- 12.10-12.11(McKinney-Vento Grantees) – Services for Homeless Children and Youth



# 11.2 Grants Programs - Services for Homeless Children and Youth



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga.gov](http://ga.gov)  
[gaDOE.org](http://gaDOE.org)

## Requirement

- The LEA records the schools in which homeless children and unaccompanied youth experiencing homelessness are enrolled.

## Documentation

- List of schools and the number of homeless children and unaccompanied youth experiencing homelessness enrolled.
- Student roster by student identifier and/or name and school location.

## 11.3 Grants Programs - Services for Homeless Children and Youth



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga.gov](http://ga.gov)  
[gaedoe.org](http://gaedoe.org)

### Requirement

- The LEA designates a liaison for homeless children and youth that has sufficient training, resources and time to carry out the duties of the Act.

### Documentation

- Copies of agendas, meeting minutes, emails and/or sign-in sheets for professional development activities received by the LEA homeless liaison and other LEA personnel responsible for the implementation of the McKinney-Vento grant program.

# 11.4 Grants Programs - Services for Homeless Children and Youth



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga.doe.org](http://ga.doe.org)

## Requirement

- The LEA has procedures for providing awareness and contact information of Homeless Liaison to parents, guardians, and all school personnel.

## Documentation

- Copy of flyers, handouts, written procedures for notifying stakeholders, program brochure, posters that identify Homeless Liaison with contact information. List of community locations where information is posted.



# 11.4 Grants Programs - Services for Homeless Children and Youth



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga.doe.org](http://ga.doe.org)

## Requirement

- 11.4 (*continued*)
- The LEA has procedures for providing awareness and contact information of Homeless Liaison to parents, guardians, and all school personnel.

## Documentation

- Training session schedules, emails, minutes, sign-in sheets, agendas, materials (including the LEA homeless policy) for all school personnel training.

# Common Finding - EHCY

## Item 11.4



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

- Common pitfalls for 11.4:
  - Did not provide a list of community locations where Homeless Education Program information is posted
  - Did not provide evidence of training for key school personnel
- Findings in the area are usually corrected if the LEA:
  - Provides a current list of community locations where Homeless Education Program information is posted
  - Schedules and holds training sessions for key school personnel responsible for delivery of services to McKinney-Vento students
- Compliance can be met by:
  - Annually updating a written list of community locations where Homeless Education Program information is displayed
  - Developing an annual timeline for training for key school personnel
  - Providing agendas, sign-in sheets and/or meeting minutes that indicate that key stakeholders and LEA personnel received Homeless Education awareness information and training throughout the school year

# 11.5 Grants Programs - Services for Homeless Children and Youth



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

## Requirement

- The LEA shall ensure that parents or guardians are fully informed of all transportation services, including to and from school of origin, and that appropriate assistance to access transportation is provided.

## Documentation

- Include schedules, agendas, training materials, sign-in sheets, emails, and request forms:
- a) Evidence of joint trainings and/or meetings with LEA Transportation Department personnel to inform and facilitate coordination.
  - b) Evidence of meetings with parents/guardians, unaccompanied youth regarding transportation options.

# Common Finding - EHCY

## Item 11.5



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga.doe.org](http://ga.doe.org)

- Common pitfalls for 11.5:
  - Provided no documentation thinking that it did not apply, especially in LEAs that claimed no homeless students
  - Although most LEAs did provide evidence that parents/guardians received information about transportation rights and options, some LEAs did not include evidence of a meeting among staff members responsible for McKinney-Vento and the LEA Transportation Department
- Findings in the area are usually corrected if the LEA:
  - Provides evidence that the LEA staff members responsible for McKinney-Vento meet with the LEA Transportation Department to discuss the LEA plan to provide transportation to students experiencing homelessness (e.g. agendas/sign-in from staff meetings, agendas/sign-in from parent meetings, emails with the Transportation Department, include in student handbooks, creating a video training video that the Transportation Department staff must attest that they viewed, etc.)

Georgia Department of Education

# 11.6 Grants Programs - Services for Homeless Children and Youth



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

## Requirement

- The LEAs shall provide services comparable to services offered to all children in the district including, but not limited to, programs for Title I, special education, English language learners, gifted and talented, vocational/technical, and before and after school programs.

## Documentation

- Evidence (student rosters, meeting minutes, emails, agendas, sign-in sheets) should include comparable services provided (ex. Title I, 21st Century, ESOL, IDEA, Voc. Ed., gifted and talented programs).

# 11.7 Grants Programs - Services for Homeless Children and Youth



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

## Requirement

- LEAs will collaborate with state, local, non-profit and social service agencies or programs to ensure that services are available for homeless children and youth.

## Documentation

- List of additional coordinating agencies, their missions, and services provided to homeless children and youth required. Copies of memoranda of agreements, contracts, etc. with coordinating agencies, if applicable.

# Common Finding - EHCY

## Item 11.7



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

- Common pitfalls for 11.7:
  - Provided no documentation thinking that it did not apply, especially in LEAs that reported zero McKinney-Vento students
  - Provided a list of coordinating agencies, but provided no information regarding the mission of those organizations, or their benefit to students experiencing homelessness
- Findings in the area are usually corrected if the LEA:
  - Provides (A) a list of coordinating agencies with (B) the mission of those organizations and (C) their benefit to students experiencing homelessness
- Compliance can be met by:
  - Providing evidence of meetings with coordinating agencies (e.g. agendas/sign-in from staff meetings, meeting minutes)

# 11.8 Grants Programs - Services for Homeless Children and Youth – Grantees Only



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[ga.doe.org](http://ga.doe.org)

## Requirement

- The LEA shall identify the educational needs of the homeless children and youth, including unaccompanied youth.

## Documentation

- Copy of the most recently completed needs assessment instrument used by the LEA to determine needs of homeless children and youth, including unaccompanied youth, and the process for conducting this needs assessment (ex: surveys, pre/post test scores, CRCT/GA Milestones scores).





# Documentation for Education of Foster Care Education Program

## Title I, Part A

Georgia Department of Education



# Evaluating Evidence Examples



# Evaluating Evidence



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)

Margaret is the Homeless Education Liaison for Maroon County Schools, an LEA that will be monitored as part of the Cross-Functional Monitoring process in 2019. Maroon County has identified 98 McKinney-Vento students, and Margaret has reached out to you for assistance and suggestions on best practices for organizing her monitoring files. Use the files provided and the enclosed monitoring indicator requirements to answer the following questions:

- 1.) Does the evidence that Margaret provided in the folder meet the monitoring requirement for the specified indicator?**
- 2.) What evidence can be included or eliminated from the folder that Margaret has prepared?**
- 3.) What strategies can be employed to enhance Margaret's organization for the provided evidence?**

# Questions and Discussion

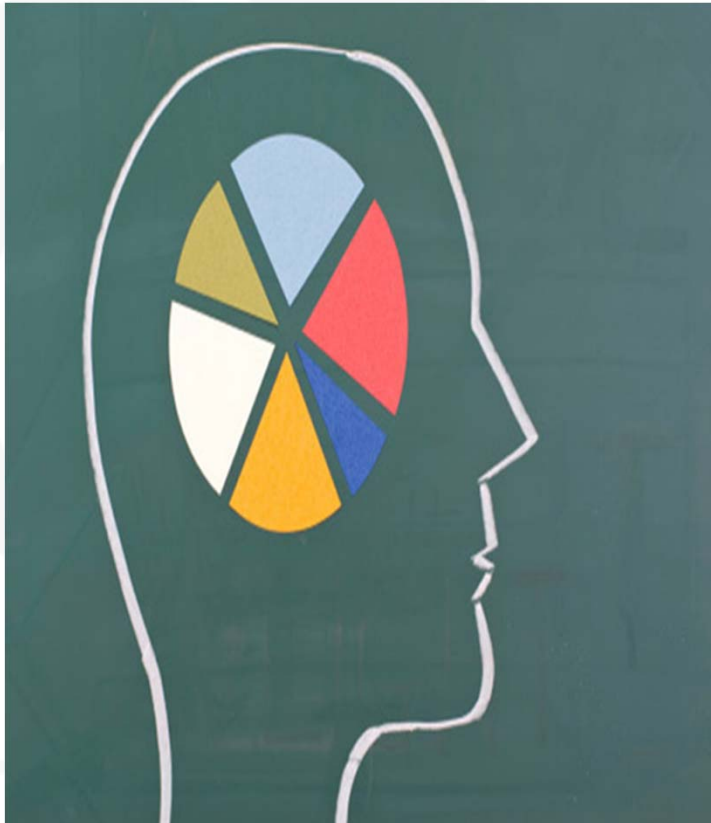


Georgia Department of Education

# Questions for Thought



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"  
[gaDOE.org](http://gaDOE.org)



- What professional development have you had, or would you like to have to enhance preparation for monitoring?
- What is one strategy that you will use from this session to assist in upcoming FY18 monitoring preparation?

# Grants Unit Contacts



Richard Woods,  
Georgia's School Superintendent  
"Educating Georgia's Future"

[ga.doe.org](http://ga.doe.org)

**Erica Glenn**  
Grants Program Consultant  
(North = RESA Regions 1-8)  
Homeless Education  
205 Jesse Hill Jr. Drive SE  
Atlanta, GA 30334  
(404) 295-4705  
[eglenn@doe.k12.ga.us](mailto:eglenn@doe.k12.ga.us)

**Eric McGhee**  
Grants Program Manager  
Homeless Education  
205 Jesse Hill Jr. Drive SE  
Atlanta, GA 30334  
(404) 651-7555  
[emcghee@doe.k12.ga.us](mailto:emcghee@doe.k12.ga.us)

**Deirdre Lynch Smith**  
Grants Program Consultant  
(South = RESA Regions 9-16)  
Homeless Education  
205 Jesse Hill Jr. Drive SE  
Atlanta, GA 30334  
(404) 656-2004  
[desmith@doe.k12.ga.us](mailto:desmith@doe.k12.ga.us)

**Whittney Mitchell**  
Grants Program Consultant  
Neglected and Delinquent  
Foster Care Program  
205 Jesse Hill Jr. Drive SE  
Atlanta, GA 30334  
(404) 656-4148  
[wmitchell@doe.k12.ga.us](mailto:wmitchell@doe.k12.ga.us)