

Monitoring 101: Effective Strategies for a Successful Monitoring Visit

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Presenter:
Kelly Whitmire, ARP-HCY Specialist

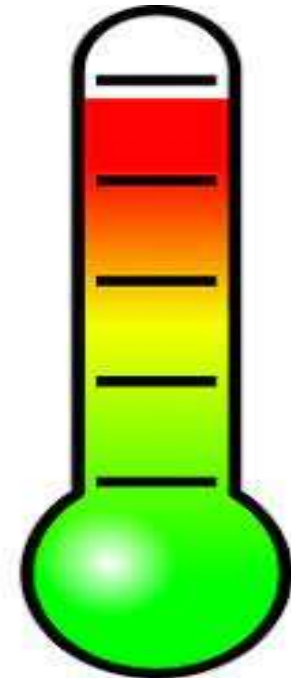
Agenda:

- Introductions
- Monitoring Temperature
- Monitoring Overview
- Preparing for Monitoring
- Tips and Tricks
- Preparing Evidence
- Common Findings
- Questions



What's Your Monitoring Temperature?

- Cold – I have never done this before. I have no idea what it is or what to put in these files. I am terrified.
- Luke Warm – I have an idea of what I need but I am still terrified.
- Warm – I feel okay about monitoring. I can probably pull it together with little findings maybe none, if I get lucky.
- Hot – I feel confident about my monitoring. I've never had any findings but I feel like I could do more to make it shine.
- Boiling - I am a monitoring super star! I know exactly what to include to make sure my program shines!



Monitoring Overview

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

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

ARP-HCY Monitoring Overview

- The ARP-HCY programs will be monitored or all districts that are being cross-functionally monitored AND all McKinney-Vento grantees
- ARP-HCY programs will be monitored in Overarching Indicators 1 & 5.
 - Be sure ARP-HCY programs are included in all procedures related to Overarching Indicators 1 and 5.
 - Make certain all ARP-HCY expenditures are part of an approved ARP-HCY application and budget.
- The ARP-HCY program does not have program specific indicators for monitoring. Programmatic requirements are met through successful monitoring of an LEA's McKinney-Vento program.

Preparing for Monitoring

- **Start Early**
- **Know What's Required**
- **Get Organized**
- **Lay out a Plan**
- **Obtain and Maintain**



Monitoring: Tips and Tricks

- ❖ Review the previous monitoring files. If there were no findings, use as a guide to know what to include.
- ❖ Use section cover sheets to detail what information is included in each section.
- ❖ Include "just enough" documentation:
 - Too much information appears as if you may be fluffing to hide lack of compliance
 - Too little information also suggests non-compliance
- ❖ Don't include information from previous years unless specifically requested.
- ❖ For overarching indicators, collaborate with your Federal Programs Director to prevent recreating the wheel.
- ❖ Have someone review your documentation prior to your monitoring using the Monitoring Evidence Sheet to ensure you haven't missed something.

Preparing Evidence

Overarching Indicators and Documentation



Preparing Evidence – Overarching Indicator 1.1

Requirement

- The LEA conducts **monitoring** of its subgrantees sufficient to ensure compliance with Title I program compliance. [§9304; §80.40 of EDGAR] **Title I, Part A (includes Homeless and N&D set-asides)**; School Improvement 1003(a); School Improvement 1003(g) SIG; Title I, Part C; **Title I, Part D**; Title II, Part A; Title III, Part A; **Title VI, Part B**; **Title IX, Part A – McKinney-Vento Act**

Documentation

- Written description of the LEA monitoring process, including on-site procedures, **timelines, schedules**, data review, and the reporting and corrective action processes. Copies of reports, corrective actions, results of technical assistance

Preparing Evidence – Overarching Indicator 1.3

Requirement

- The LEA conducts **monitoring** of its subgrantees sufficient to ensure compliance with Title I program compliance. [§9304; §80.40 of EDGAR] **Title I, Part A (includes Homeless and N&D set-asides)**; School Improvement 1003(a); School Improvement 1003(g) SIG; Title I, Part C; **Title I, Part D**; Title II, Part A; Title III, Part A; **Title VI, Part B**; **Title IX, Part A – McKinney-Vento Act**

Documentation

- Homeless Education Program Evaluation Summary

Preparing Evidence

Item 2.1 – Consolidated LEA Improvement Plan (CLIP)

Requirement

2.1 The LEA ensures that it complies with the provision for submitting an annual application to the SEA and revising the LEA's plans as necessary to reflect substantial changes in the direction of the LEA's program.

Documentation

- a. Written procedures for creating, reviewing, and approving the CLIP for all programs, which shall include resolution procedures for unapproved CLIPs
- b. Documentation to support the selection of evidence-based action steps in CLIP
- c. CLIP Preparation:
 1. Evidence to verify the participation of required stakeholders and community-based partners in CLIP preparation
 2. Evidence of CLIP preparation may include review checklists (CLIP Review Rubric), established schedule, samples of correspondence with schools and other LEA departments

Preparing Evidence

Item 4.1 – Maintenance of Effort

Requirement

4.1 The LEA ensures that it complies with the procedures for ensuring maintenance of effort (MOE) as outlined in Sec. 1120A and 8521 of the ESEA and IDEA as outlined in 34 CFR 300.203, 34 CFR 300.204, and 34 CFR 300.205. ESEA: Sec. 1120A; Sec. 1114, 1118; 34 CFR 300.203, 34 CFR 300.204, 34 CFR 300.205

Documentation

- A. ESSA Documentation for ensuring maintenance of effort (MOE) for ESSA programs:
1. Written Procedures (ONLY if MOE is NOT MET) for determining maintenance of effort (MOE), including funds to be excluded from MOE calculations
 2. ESEA documentation for ensuring maintenance of effort (MOE) as outlined in Sec. 1120A and 8521 of the ESEA shall include:
 - If MOE is Met during the current fiscal year, no evidence is required
 - If MOE is NOT MET during the current fiscal year, the following is required:
 - Source data to support the request to the Department to seek waiver

Preparing Evidence

Item 5.1 – Internal Controls

Requirement	Documentation
<p>5.1a. <u>Evidence that all LEA Internal Controls</u> 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</p>	<p>5.1a. Evidence shall include internal controls required to be in writing by 2 CFR Part 200:</p> <ul style="list-style-type: none"> 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)

Preparing Evidence

Item 5.1

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 previous and current year 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 previous and current year 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 previous year Completion Report and current year general ledger for each federal program
- g. Copy of signed and time stamped documentation verifying vendors against suspension and debarment database.

Preparing Evidence

Item 5.2 - Inventory

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.

Preparing Evidence

Item 5.3 – Cash Management

Evidence shall include:

- Written cash management (payment) procedures
- Copies of all previous and current year DE0147s for each federal program being monitored. Include supporting accounting records
- Evidence that the LEA reconciles drawdown requests as needed and maintains supporting documentation



Item 11: Services for Homeless Children and Youth

Monitoring Indicators and Documentation

Indicator 11.1: Services for Homeless Children and Youth

Requirement

- The LEA has written procedures for the education of homeless children and youth that identify and remove any barriers. The written procedures must include:
 - a) Identification
 - b) School Selection
 - c) Enrollment
 - d) Transportation
 - e) Disputes
 - f) Full or Partial Coursework Credit

Documentation

- Copy of LEA written procedures for Education for Homeless Children and Youth indicating annual revision and/or review date (month, date, and year).

Indicator 11.2: Services for Homeless Children and Youth

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.

Indicator 11.3: Services for Homeless Children and Youth

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.

Indicator 11.4: Services for Homeless Children and Youth

Requirement

- The LEA has procedures for providing awareness and contact information of Homeless Liaison to parents, guardians, and **all** LEA 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.
- Training session schedules, emails, minutes, sign-in sheets, agendas, materials (including the LEA homeless policy) for **all** LEA personnel training.

Indicator 11.5: Services for Homeless Children and Youth

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.

Indicator 11.6: Services for Homeless Children and Youth

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).

Indicator 11.7: Services for Homeless Children and Youth

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.

Indicator 11.8: Services for Homeless Children and Youth

****Grantees Only****

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).

Indicator 15.1: Services for Foster Children and Youth

Requirement

- The LEA collaborates with state or local child welfare agencies to designate points of contact and develop procedures to address school stability and transportation to school for children and youth in care.

Documentation

- Collaborative planning agendas, minutes, attendance sheets, phone logs, emails or other correspondence between the LEA and local child welfare agency.

Common Monitoring Findings



Common Findings

Item 1.3

Common Pitfalls:

- Provided no documentation thinking that it did not apply to the Grants Unit
- Provided a monitoring plan that did not include Grants Unit Programs
- Policies and/or procedures do not have current year review date

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
- Includes a current year review or revision date

A correctly formed monitoring plan is all that is needed to meet minimum compliance.

Common Findings Items 5.1, 5.2 & 5.3

Common Pitfalls:

- 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 this area are usually corrected if the LEA either:

- 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

Common Finding-EHCY

Item 11.4

Common Pitfalls:

- Did not provide a list of community locations where Homeless Education Program information is posted
- Did not provide evidence of training for all LEA personnel

Findings in this area are usually corrected if the LEA either:

- Provides a current list of community locations where Homeless Education Program information is posted
- Schedules and holds training sessions for all LEA personnel, including those responsible for delivery of services to McKinney-Vento students

Common Finding-EHCY

Item 11.5

Common Pitfalls:

- 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 this area are usually corrected if the LEA either:

- 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.)

Common Finding - EHCY Item 11.7

Common Pitfalls:

- 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 this area are usually corrected if the LEA either:

- 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).



Questions and Discussion



GA DOE Contact Information

Maria Davis

Grant Program Consultant
Homeless Education
Twin Towers East, Suite 1562
Atlanta, GA 30334
maria.davis@doe.k12.ga.us

Kelly Whitmire

ARP-HCY Specialist
Homeless Education
Twin Towers East, Suite 1562
Atlanta, GA 30334
kelly.whitmire@doe.k12.ga.us

Eric McGhee

Grants Program Manager
Federal Programs Division
Twin Towers East, Suite 1562
Atlanta, GA 30334
emcghee@doe.k12.ga.us

Whittney Mitchell

Grant Program Consultant
Homeless Education
Twin Towers East, Suite 1562
Atlanta, GA 30334
wmitchell@doe.k12.ga.us

Dr. Vanita Moon

ARP-HCY Specialist
Homeless Education
Twin Towers East, Suite
1562
Atlanta, GA 30334
vanita.moon@doe.k12.ga.us



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