

# Monitoring and Compliance

Office of Federal Programs

Consortium Training – February 2019



MISSISSIPPI  
DEPARTMENT OF  
EDUCATION

Ensuring a bright future for every child

**Judy Nelson**

Office of Federal Programs

## VISION

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To create a world-class educational system that gives students the knowledge and skills to be successful in college and the workforce, and to flourish as parents and citizens

## MISSION

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To provide leadership through the development of policy and accountability systems so that all students are prepared to compete in the global community

MISSISSIPPI STATE BOARD OF EDUCATION  
**STRATEGIC PLAN GOALS**

**1**

**All  
Students  
Proficient  
and Showing  
Growth in All  
Assessed  
Areas**



**2**

**Every  
Student  
Graduates  
from High  
School and  
is Ready for  
College and  
Career**



**3**

**Every  
Child Has  
Access  
to a High-  
Quality Early  
Childhood  
Program**



**4**

**Every  
School Has  
Effective  
Teachers and  
Leaders**



**5**

**Every  
Community  
Effectively  
Uses a  
World-Class  
Data System  
to Improve  
Student  
Outcomes**



**6**

**Every  
School and  
District is  
Rated “C” or  
Higher**



# Office of Federal Programs

## Vision

**The vision of Mississippi State Board of Education is to create a world-class educational system that gives students the knowledge and skills to be successful in college and the workforce, and to flourish as parents and citizens.**

## Mission

In support of this vision, the mission of the Office of Federal Programs (OFP) is to provide leadership in the effective use of federal funds so that all students are prepared to compete in the global community.

### Goal 1

To collaborate across the agency in support of state initiatives

### Goal 2

To support district planning and implementation

### Goal 3

To evaluate and monitor performance

# SESSION OVERVIEW AND AGENDA

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# Session Overview

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The purpose of this session is to provide participants with updates regarding FY19 Monitoring as they relate to the Every Student Succeeds Act (ESSA).

## **Expected Outcomes:**

- A clearer understanding of federal requirements under ESSA
- Review fiscal and programmatic elements of monitoring instrument

# Agenda

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1. On-site Monitoring Protocol
2. FY18 Monitoring – Lesson Learned
3. Fiscal Indicator Review
4. Programmatic Indicator Review
5. Feedback

# FY19 MONITORING PROTOCOL



# Risk Analysis

## Office of Federal Programs Risk Assessment Tool:

- Assess the financial and programmatic management of all federal grants
- Identify potential problems
- Analyze or evaluate the level of risk associated with concerns and areas of noncompliance
- Identifies conditions, situations, and processes that may cause areas of noncompliance

# Risk Assessment Results

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- High Risks – 11
- Medium Risk – 11
- 3 Years Since Last Monitoring – 37
- Total of 59 LEAs will receive on-site consolidated monitoring

# FY19 Monitoring Overview

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- FY19 Consolidated Monitoring will cover Title I, Part A; Title II, Part A; Title IV, Part A, and Title V
- FY19 Consolidated Monitoring will review documentations from the 2017-2018 school year
  - Will review 2018-2019 documentations if LEA self-corrected

# FY19 Monitoring Overview

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- FY19 Consolidated Monitoring will continue to be a fiscal review with a focus on fiscal indicators
  - Indicators A - U

# FY19 Monitoring Overview

- The following programs will receive on-site review of both programmatic and fiscal indicators
  - School Improvement
    - Indicator Section II – Focus School
    - Indicator Section JJ – Priority School
  - Title I, A Neglected: Indicator Section KK
  - Title I, Part D Subpart 2: Indicator Section LL
  - Title III: Indicator Section NN
  - 21<sup>st</sup> CCLC (Year 2 only): Indicator Section PP
  - McKinney Vento: Indicator Section RR

# FY19 Monitoring Overview

- If a LEA is receiving on-site consolidated monitoring and have one or more of the previous mentioned programs, then all programs will be monitored at one time
- Example: Apple School District will receive on-site consolidated monitoring, and have Title I, Title II, Title III, Title IV, Title V, Homeless, and 21<sup>st</sup> Century (Year 1). Then the LEA receiving fiscal monitoring and programmatic monitoring of Title III and Homeless (21<sup>st</sup> Century is excluded because of Year 1 status).

# FY19 Self-Assessment

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The FY19 Monitoring Protocol will consist of a Self Assessment Survey that will cover the Programmatic indicators for Titles I, II, IV-A, and V.

- ALL LEAs must submit a programmatic self-assessment survey by May 17, 2019.
- The survey will be released in March 2019

# FY19 Self-Assessment Survey

## FY19 Self Assessment Survey

	Indicator	Compliant	Non-Compliant LEA Action Taken	Non-Complaint Technical Assistance Needed	Comment
AA	Title I, Part A: LEA-Level Reservations & Allocations				
BB	Title, Part A: General Requirements				
CC	Title I, Part A: Foster Care				



# FY19 Monitoring Preparation

- Work internally to collaborate in preparation for a successful monitoring experience
- Human Resources
  - Waste, Fraud, Abuse
  - PII Training

# FY19 Monitoring Preparation

- Work internally to collaborate in preparation for a successful monitoring experience
- Collaborate with human resource department, financial department, curriculum and instruction department, family engagement, EL coordinators, MSIS personnel, etc.

# FY19 Monitoring Preparation

- Financial Department
  - ensure approved budget in the LEA account system
  - collaborate on a regular basis to monitor drawdowns, allowable expenditures, paid Title I staff
- Fixed Asset
  - ensure a completed asset check
  - documentation of missing, stolen equipment

# FY19 Monitoring Preparation

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- Federal Programs Department
  - Review current monitoring document
  - Discuss responsibilities and organization of monitoring
  - Organize documents for upload and prepare on-site document folders
  - Gather documentation according to what the monitoring requirements

# FY19 Monitoring Protocol

1. The Office of Federal Programs will contact LEA/Subgrantee to establish a Primary Point of Contact for monitoring (Federal Programs Director).
2. The LEA/Subgrantee's Primary Point of Contact is responsible for uploading **documents to support compliance indicator**. Documents may include a word document, pdf document, or word document containing a link to the specific policies and/or procedures online. Documents must be uploaded to the LEA document library in MCAPS by the specified date.

# FY19 Monitoring Protocol

3. The LEA Monitoring Team may consist of the Federal Programs Director, 21st Century Coordinator, Business Manager, program directors, and other fiscal personnel (bookkeepers, accountants, etc.) and should all be available for the entire monitoring visit.
4. The on-site visit will begin with an entrance interview with all members of the LEA Monitoring Team. All programs involved in monitoring must be available during the on-site monitoring visit.

# FY19 Monitoring Protocol

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5. The on-site visit lasts from one to five days, depending upon the scope of the visit. During the visit, the MDE team reviews evidence of implementations and other supporting program documents, visits selected school sites, and interviews the LEA staff and other stakeholders.
6. At the conclusion of the visit, an exit interview is held with the superintendent, federal programs director, business manager, and other key personnel to discuss commendations, recommendations, and/or findings.

# Document Upload

- The LEA will use MCAPS to upload monitoring documents in appropriate folders

**LEA Document Library**

[Redacted] FY 2019

**Root Folders:**

General
2020
2019
2018
2017

←

Show Folders

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**LEA Document Library** [Expand All] [Collapse All]

+ General

- 2019

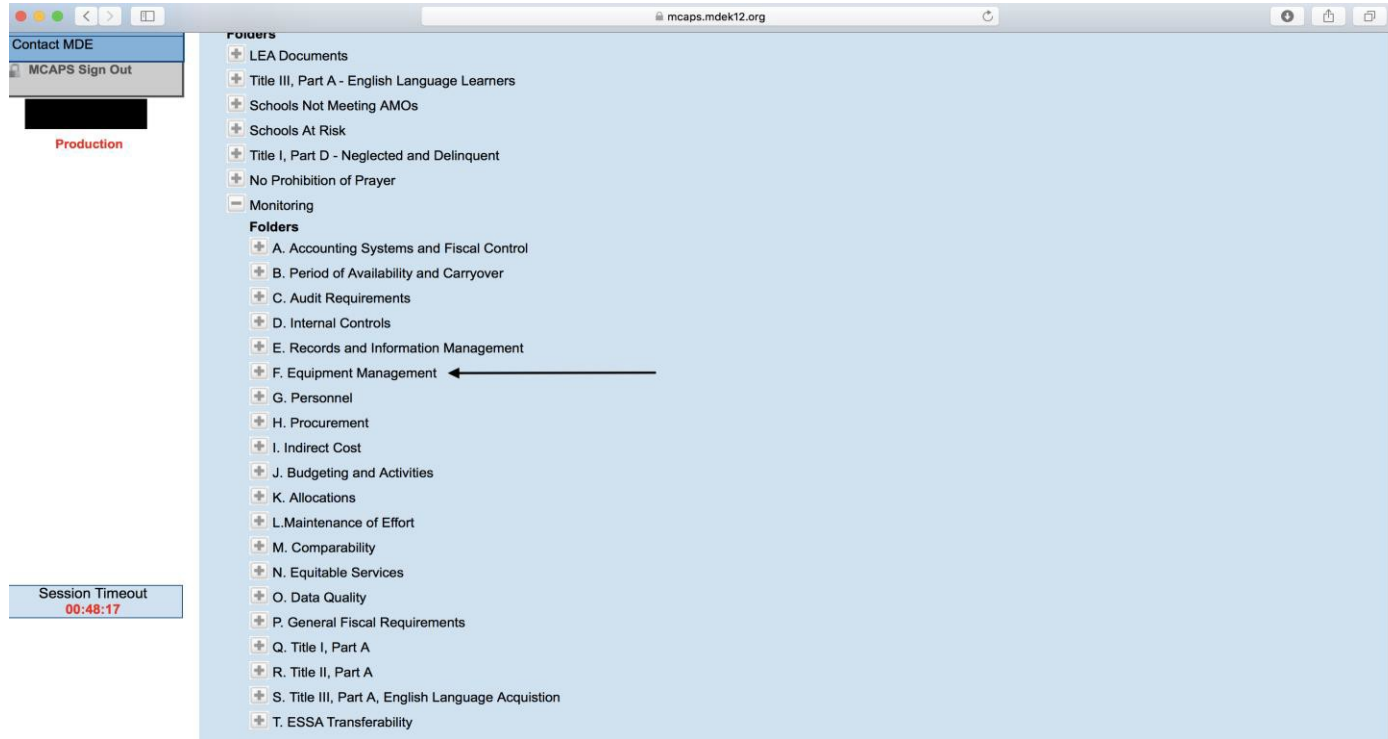
**Folders**

- + LEA Documents
- + Title III, Part A - English Language Learners
- + Schools Not Meeting AMOs
- + Schools At Risk
- + Monitoring ←
- + Title I, Part D - Neglected and Delinquent
- + No Prohibition of Prayer
- + Equitable Services to Private Schools
- + SNS



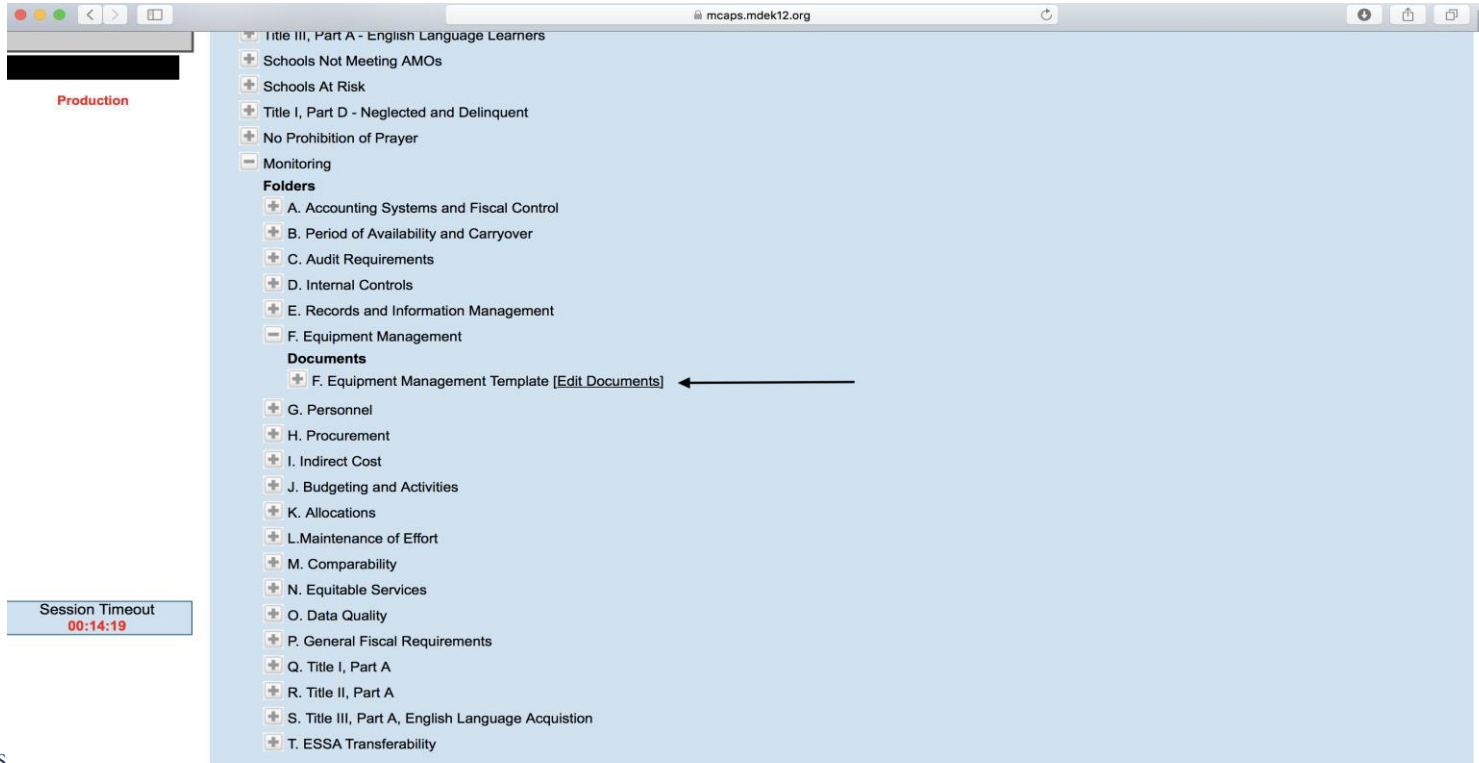
# Document Upload

- Select appropriate folder to upload document



# Document Upload

- Select “Edit Documents”



# Document Upload

- Select the Indicator Document Template

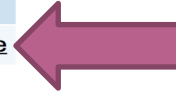
## Update Documents And Links

- FY 2019

Document Information	
Document Name	F. Equipment Management Template
Folder Hierarchy	2019 Monitoring F. Equipment Management
Upload Begin Date	1/29/2019
Upload End Date	
Minimum Required Count	1
Maximum Allowed Count	
Document Template	<u>F. Equipment Management Template</u>

[Create Link](#)  
[Upload Document](#)

Documents/Links



# Document Upload

- Complete the Indicator Document Template

**District Name** \_\_\_\_\_

The information in the folders for **Equipment Management** include:

Indicator #	Items Uploaded	Comments
A1	<ul style="list-style-type: none"><li>Purchasing Procedures (see page 5)</li><li>See Folder B</li></ul>	

Add Indicator  
#

-Name of document for  
corresponding indicator  
(include specific reference  
if applicable)  
-Include a link to the  
LEA's policies/procedures  
online if applicable

# Document Upload

- Upload Template Document (e.g. F. Equipment Management Cover Page)

**JACKSON PUBLIC SCHOOL DIST (2520) Public District - FY 2019**

Document Information	
Document Name	F. Equipment Management Template
Folder Hierarchy	2019 Monitoring F. Equipment Management
Upload Begin Date	1/29/2019
Upload End Date	
Minimum Required Count	1
Maximum Allowed Count	
Document Template	<u>F. Equipment Management Template</u>

[Create Link](#)

[Upload Document](#)

Documents/Links

# Document Upload

- Continue to upload document according to indicator cover page

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**JACKSON PUBLIC SCHOOL DIST (2520) Public District - FY 2019**

Document Information	
<b>Document Name</b>	F. Equipment Management Template
<b>Folder Hierarchy</b>	2019 Monitoring F. Equipment Management
<b>Upload Begin Date</b>	1/29/2019
<b>Upload End Date</b>	
<b>Minimum Required Count</b>	1
<b>Maximum Allowed Count</b>	
<b>Document Template</b>	<u>F. Equipment Management Template</u>

[Create Link](#)  
[Upload Document](#)

**Documents/Links**

# Document Upload

- Name the document by indicator and description (e.g. A1. Purchasing Procedure)
- If multiple indicators require the same document, then upload the document once, and refer back to the document on the indicator cover page (e.g. See Folder C, Indicator C2)

# Document Upload

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- “The more you give, the more we know.”
- Upload documents specific to indicator
- Upload LEA’s policy and/or LEA’s procedure
- Highlights and reference notes are acceptable



# FY18 COMMON MONITORING FINDINGS

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# FY18 Common Monitoring Findings

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- Lack of written policies and/or procedures
  - May not be a simple restatement of law
- Lack of implementation of written policies and/or procedures (LEAs not following their own written policies and/or procedures)
  - Insufficient evidence of implementation

# FY18 Common Monitoring Findings

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- Incomplete procurement packets
- Lack of competitive processes (e.g., 2<sup>nd</sup> quotes, competitive bids)
- Excessive use of Sole Source letter
- Lack of segregation of duties
- Lost/stolen equipment
- Overbudget

# FY18 Common Monitoring Findings

## TOP THREE QUESTIONED COST

1. Incomplete procurement packets
2. Lost/missing/stolen equipment without proper documentation
3. Overbudget/budget not aligned (function, object, location)

# FY19 Citations

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- Citations
  1. Fail to submit policy and/or procedure OR
  2. Submitted policy and/or procedure lacked required element OR
  3. Failed to implement policy and/or procedure

# FY19 MONITORING

# FISCAL

# FY19 Monitoring Protocol

## New fiscal indicators

- **E. Records**

**E-5** LEA/Subgrantee has a policy and/or procedures for providing military recruiters and Institution of Higher Learner (IHL), upon request, required directory information for students. (Sec. 8525)

- LEAs will only receiving recommendations, not citation

# FY19 Monitoring Protocol

## New fiscal indicators

- **O. Data Quality**

**O-1:** The LEA/Subgrantee has board policy and/or procedures for reviewing the LEA/Subgrantee and school level data. The policy and/or procedures include data quality checks, including automated business rules and manual data quality rules, to ensure the accuracy of reporting data, and to ensure that it is identifying problems in the data



# FY19 Monitoring Protocol

## New fiscal indicators

- **O. Data Quality**

**O-2:** Describe the management certification (or verification, sign-off, or related) process the LEA requires of schools to ensure that reported data are accurate and complete (e.g., review process for determining data are ready for certification, how responsibility for the certification is assigned, consequences for certifying inaccurate data).

# FY19 Monitoring Protocol

## New fiscal indicators

- **O. Data Quality**

**O-3:** How does the LEA monitor schools to ensure they have processes in place so that reported data are accurate and complete (e.g., periodic monitoring, review of school business rules, audits of submitted data)?

# FY19 Monitoring Protocol

## New fiscal indicators

- **O. Data Quality**

**O-4:** Does the LEA have procedures in place for reviewing LEA and school level data?

**O-5:** What is the LEA's process for building the capacity of staff responsible for data management?

- **All sections of O - LEAs will only receiving recommendations, not citation**

# FY19 Monitoring Protocol

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- **All sections of O - LEAs will only receiving recommendations, not citation**

# FY19 Monitoring Protocol

## New fiscal indicators

- **Q. Title I, Part A**

**Q-1: Supplement, not Supplant**

### **FY19 Methodology Review**

- **R. Title II, Part A**

**R-2: Administrative Cost**

# FY19 Monitoring Protocol

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## New fiscal indicators

- **S. Title III, Part A**  
**S-2: Administrative Cost**

# FY19 Monitoring Protocol

## New fiscal indicators

- **T. Title IV, Part A**

**T-1:** Administrative Cost

**T-2:** Required Category Spending (will review all expenditures to ensure required spending)

**T-3:** 15% Cap

**T-4:** Allowable Use of Funds

**T-5:** Supplement, not Supplant

# FY19 Monitoring Cross-Cutting

All federal programs will monitor the following fiscal indicators:

- A. Accounting Systems and Fiscal Controls
- B. Period of Availability
- C. Audit Requirements
- D. Internal Controls
- E. Records and Information Management
- F. Equipment Management
- G. Personnel
- H. Procurement



# FY19 Monitoring Cross-Cutting

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- I. Indirect Cost
- J. Budget and Activities
- K. Allocations
- N. Equitable Services
- O. Data Quality
- P. General Fiscal Requirements



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