

FORV/S

ESSER I Subrecipient Monitoring Training

January 22, 2024

Grants Management Services

Your Presenters



Lindsey JacksonSenior Managing Consultant



Darshana Shyamsunder Managing Consultant



Matt McClelland
Lead Consultant



DeAndre CampbellSenior Consultant

Your ESSER I Monitoring Team



Julie Murdock Managing Director



Lindsey JacksonSenior Managing Consultant



Darshana Shyamsunder Managing Consultant



DeAndre CampbellSenior Consultant



Evan MastersSenior Consultant



Cecilia Farris
Senior Consultant



Diana OxnerConsultant



Maggie Crider
Consultant



Sara Herdman
Consultant



Note: FORVIS may pull in additional team members to assist in monitoring on an as needed basis.

Legal Disclaimer

FORVIS presenters are not providing legal advice. This presentation is meant to be an overview of the ESSER I monitoring for MDE and should not be taken as legal guidance from the US Department of Elementary and Secondary Education, MDE, or FORVIS.

 LEAs should direct specific questions to the ESSER Monitoring email address: essermonitoring@mdek12.org.



AGENDA

- ESSER I Subrecipient Monitoring Overview
- Monitoring by Risk Level
- Monitoring Process
- Expectations By Risk Level
- Virtual and On-Site Visits
- Uploading Documentation to MCAPs
- Corrective Action & Clearance Reports
- Questions

ESSER I Subrecipient Monitoring Overview



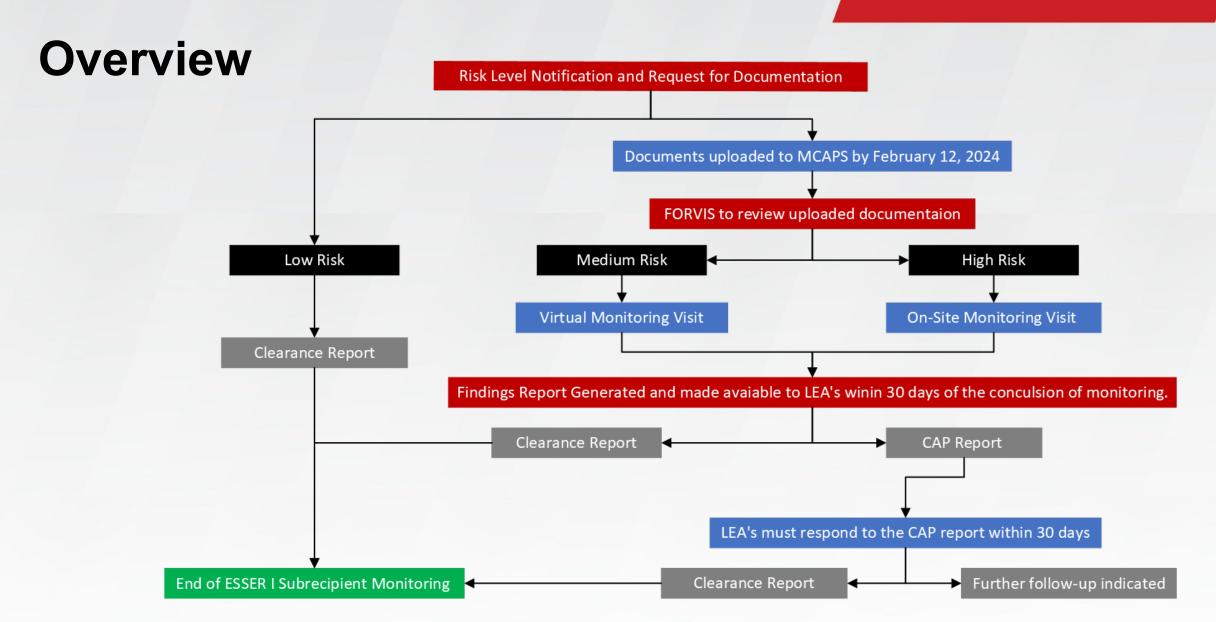
ESSER I Subrecipient Monitoring Overview

- FORVIS has determined LEA risk level based on the following:
 - Predefined Risk Indicators
 - Data from MDE
 - LEA self-assessment questionnaire responses
- FORVIS will conduct subrecipient monitoring from February to June 2024
 - Initial communication will be sent out the week after this training



Monitoring Process







Risk Assessment Methodology



Monitoring by Risk Level

	Low Risk	Medium Risk	High Risk
Risk Score	0-9	10-24	25+
Type of Monitoring	Not Applicable	Virtual	On Site
Risk Level Determination Letters		⊘	(
LEA's Provide Documentation	×	⊘	⊘



Risk Indicators Explained

Assessment Criteria	Scoring Guidance
Prior Grants Experience	No Experience = 5 Experience = 0
Single Audit	No Audit Findings = 0 Audit Findings = 10
Audit Findings Over Financial Reporting	No = 0 Yes (or if no audit occurred) = 25
Onsite Monitoring or Desk Reviews Performed on Federal Grant Programs by a Federal Agency in the Last Three Years	No Findings (but monitoring was performed) = 0 Closed Findings = 3 Open Findings = 5
Last Fiscal Monitoring	< 4 years ago = 0 > 4 years ago = 5



Risk Indicators Explained

Assessment Criteria	Scoring Guidance
Overpayments	No Overpayment = 0 Overpayment = 5
Questioned Cost	\$0-\$5,000 - Low Risk = 0 \$5,001 - \$25,000 - Medium Risk = 5 \$25,001+ - High Risk = 10
Lapsed/Forfeited Funds	\$0-\$5,000 - Low Risk = 0 \$5,001 - \$25,000 - Medium Risk = 3 \$25,001+ - High Risk = 5
Equitable Services	No- Low Risk = 0 Yes - High Risk = 5
Subrecipient Award Amount as a percentage of Recipient Total Grant Award	0%-0.75% - Low Risk = 0 0.76-1.25% - Medium Risk = 3 1.25% and greater - High Risk = 5



Risk Indicators Explained

Assessment Criteria	Scoring Guidance
Salary Amount as a Percentage of Subrecipient Total Award	0%-15% - Low Risk = 0 15.01%- 30.00%- Medium Risk = 3 30.01% And Greater - High Risk = 5
Prior Year Expense Request	No- Low Risk = 0 Yes - High Risk = 5



Expectations by Risk Level



What to Expect: Low Risk

- Receive Risk Determination Letter along with ESSER I monitoring clearance.
- No further review needed
- Note: MDE reserves the right to request additional policies, procedures, supporting documentation and reporting as outlined in your Grant Agreement

What to Expect: Medium Risk

- Receive Risk Determination Letter
- Upload documents requested to MCAPS
- FORVIS will review the documents and schedule virtual monitoring visit
- 50% sample of expenditure supporting documentation may be requested

What to Expect: High Risk

- Receive Risk Determination Letter
- Upload documents requested to MCAPS
- FORVIS will review the documents and schedule on-site monitoring visit
- 75% sample of expenditure supporting documentation may be requested

Examples of Documentation

- General Ledger export for January 1, 2020 – December 31, 2022, in XLS/CSV as well as pdf format
- Expenditure Sheets
- Invoices
- Purchasing Orders
- Proof of Payment

Virtual & On-Site Visits



Virtual Visits

- Virtual visits will be held via Microsoft Teams or Zoom based on LEA's preference
- Virtual visits are expected to occur during the months of February June 2024
- Virtual visits will be scheduled with the LEA in advance
- Visits can be expected to last from 1–3 hours
- All key personnel responsible for ESSER I administration must be available during the visit
- Additional documentation may be requested at the time of the visit



On-Site Visits

- On-site visits are required for high-risk LEAs
- On-site visits will occur during the months of February June 2024
 - On-site visits will be scheduled with the LEAs 4 weeks in advance
- Visits can be expected to last from 1–2 days
- There will be two or more members of the subrecipient monitoring team present
- Key personnel responsible for ESSER I administration must be available during the visit
- Additional documentation may be requested at the time of the visit



Uploading Documentation to MCAPS



Navigating to appropriate MCAPs folder



Log into MCAPS, select Search on the navigation menu.

Then select Organizations.





Select the LEA

On the Search Organization screen, type in the name or letter of the LEA you are searching for.

(in this case its J for Jackson)







MCAPS Home Administer Search Reports nbox Planning Monitoring Funding Requests for Funds Project Summary **LEA Document Library** Address Book MDE Document Library Contact MDE MCAPS Sign Out Campbell, DeAndre

Production Session Timeout

MCAPS Home

JACKSON PUBLIC SCHOOL DIST (2520) Public District - FY 2024

Announcements

Grant Balances for Grants w/Liquidation Deadline 12/30/2023

The MDE will have two opportunities for LEAs to request reimbursement during the month of December.

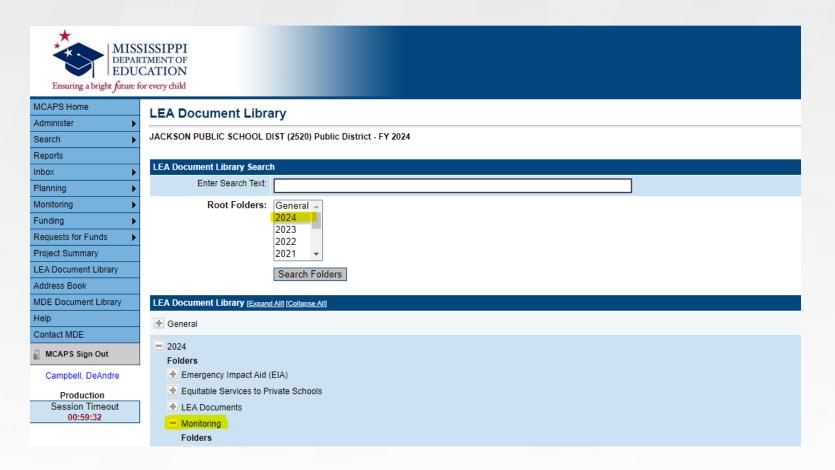
- December 6, 2023 (Regular Drawdown)
- Request for funds for all grants
- December 30, 2023 (Grants in Liquidation Only)
 - Request for funds for FY21 (Title I-Part A, Title I-Neglected, Title I Part D Subpart 2, Title I Part D Subpart 1, Title II, Title III, Title IV, Title
 - Request for funds for FY22 (IDEA, Part B, IDEA Preschool, ARP IDEA Part B, ARP IDEA Preschool, ESSER II CTE Equipment Grant, ESSE
 - Request for funds for FY23 (21st CCLC Cohort 2, 21st CCLC Cohort 5, ESSER II N and D Year 2)

If you have any questions, please reach out to your program contact. Thank you.

Make sure LEA name is visible under the MCAPS home. (in this case Jackson Public School Dist. (2520) is visible).

On the left-hand side (on the navigation menu) select LEA document library.





In the LEA Document
Library select year 2024
and search folders.

Once FY 2024 shows underneath LEA document library, click the "monitoring" dropdown.



- KK. Hitle IX INCKINNEY-Vento Homeless Subgrantees
- Corrective Action
- SS. Title I School Improvement Comprehensive Support & Improvement
- TT. Title I School Improvement Targeted Support & Improvement
- ESSER I Monitoring

Folders

- Fiscal Monitoring
- + Costs
- Audit and Financial Findings
- Internal Controls
- Personnel
- Data Quality
- **±** Equipment
- Procurement
- Equitable Service
- + Other

Once folders have expended, select ESSER 1 monitoring dropdown.

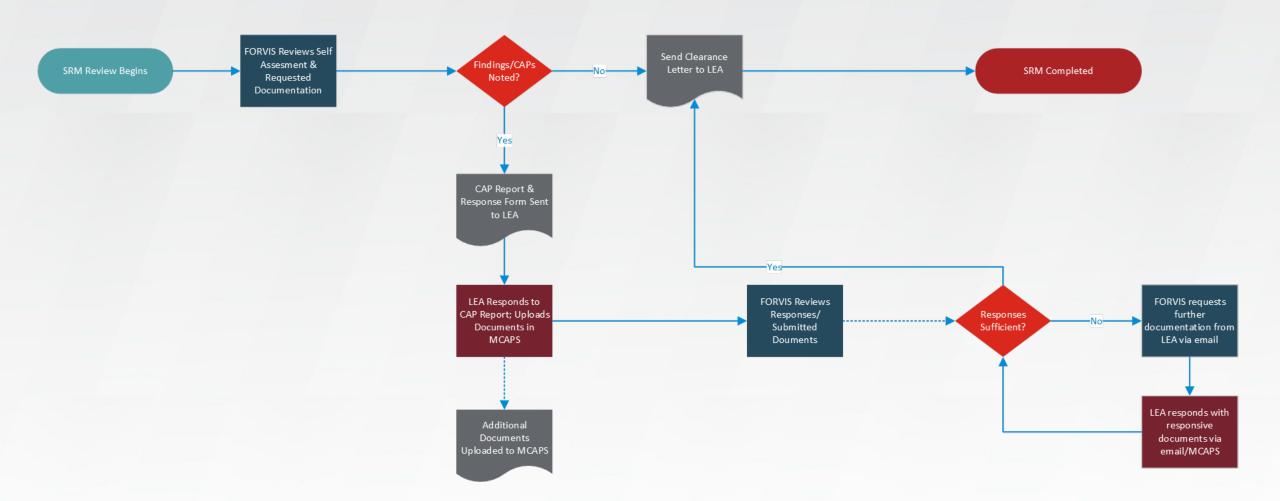
The LEA backup documentation will be uploaded into the corresponding folder.



Corrective Action Plans & Clearance Reports



Review Process Overview





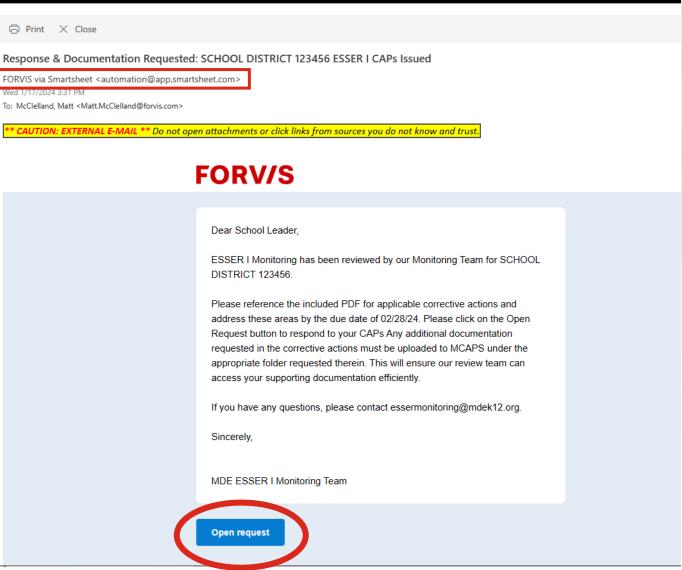
CAP Report Process Explained

- Following the documentation review and monitoring visit, LEA's will be issued one of two reports:
 - CAP Report indicating findings that must be addressed
 - Clearance Report indicating LEA is in compliance for ESSER I
- CAP reports will be issued to LEA's within 30 days after the conclusion of the virtual or on-site monitoring visit.
- LEA's will have 30 days after receipt of the report to respond to any findings.
- LEA's will respond to CAPs via a link provided with your CAP Report
- All additional documentation should be uploaded to the appropriate MCAPs folder

FORV/S

LEA Correspondence Example

- LEA will receive an email from FORVIS via
 Smartsheet when review has completed
- Click on the "Open Request" button to respond to your CAPs





Responding to CAPs

- The LEA's CAPs can be reviewed by clicking on the "1 Attachment" link in the Attachments link.
 - Note: Please do not upload documentation in this form
- Respond to your respective CAPs
- Click "Submit Update"
- Upload additional documentation as directed in MCAPs

FORV/S

Response & Documentation Requested: SCHOOL DISTRICT 123456 ESSER I CAPs Issued

Dear School Leader.

ESSER I Monitoring has been reviewed by our Monitoring Team for SCHOOL DISTRICT 123456

Please reference the included PDF for applicable corrective actions and address these areas by the due date of 02/28/24. Please click on the Open Request button to respond to your CAPs Any additional documentation requested in the corrective actions must be uploaded to MCAPS under the appropriate folder requested therein. This will ensure our review team can access your supporting documentation efficiently.

If you have any questions, please contact essermonitoring@mdek12.org.

Sincerely,

MDE ESSER I Monitoring Team

	I. Fiscal Monitoring - LEA Response	7
2	II. Costs - LEA Response	
1	Attachments Uplo 1 Files 1 Attachment	
	MDE ESSER I Subrecipient Monitoring CAP Report_Test.pdf	
	Send me a copy of my responses	





CAP Report Example



RE: ESSER I Monitoring - Corrective Actions Issued

Dear Dr. Smith:

The initial ESSER I Monitoring has been completed by our Monitoring Team for SCHOOL DISTRICT 1.

Please reference the enclosed pages for applicable findings/corrective actions and address these areas by the due date of **February 28, 2024**. Your response to each finding/corrective action should be recorded using the link provided in this document.

In addition, please upload the requested documentation outlined the corrective action in MCAPs. This will ensure our review team can access your supporting documentation efficiently.

If you have any questions, please do not hesitate to contact essermonitoring@mdek12.org.

Sincerely,

MDE ESSER I Monitoring Team

Enclosures

Cc: Mississippi Department of Education

FORV/S



I. Fiscal Monitoring

FINDING(S)	CORRECTIVE ACTION(S)
The LEA failed to provide a written policy and/or procedure.	Your LEA must develop written policies and/or procedures for determining allowability of costs for ESSER I funds. Please provide policies and procedures that ensure that ESSER I funds are for allowable expenditures as defined in the Federal cost principles for ESSER I funds (March 13, 2020 - September 30, 2022). Your LEA must develop written policies and/or procedures to ensure Federal Funds are spent for allowable expenditures per 2 CFR 200. Please provide policies and procedures that document the steps the LEA will take to ensure costs expended under a federal award are allowable.
The LEA provided a written policy and/or procedure; however, the LEA policy and/or procedure included insufficient information.	Your LEA must develop written policies and/or procedures that periodically review its accounts to ensure that transactions (including refunds and recoded transactions) have been accurately and properly recorded. Your general ledger should make use of accounting codes to keep track of expenses based on ESSER I and MDE guidance. Please provide updated policies and procedures that periodically review its accounts to ensure that transactions (including refunds and recoded transactions) have been accurately and properly recorded. Your general ledger should make use of accounting codes to keep track of expenses based on ESSER I and MDE guidance.

ADDITIONAL DOCUMENTATION REQUESTED

ESSER I Corrective Action Report



II. Costs

FINDING(S)	CORRECTIVE ACTION(S)
The LEA provided a written policy and/or procedure; however, the LEA policy and/or procedure included insufficient information.	Your LEA must develop written policies and/or procedures that applies indirect cost rates to actual amounts expended when making indirect cost charges for Federal award. Please provide documentation showing updated written policies and/or procedures that applies indirect cost rates to actual amounts expended when making indirect cost charges for Federal award.

ADDITIONAL DOCUMENTATION REQUESTED

Updated Policies & Procedures

ESSER I Corrective Action Report

What Happens Next

- Following LEA CAP responses, the subrecipient monitoring team will conduct a second review.
- Once all CAP findings have been addressed, a Clearance Report will be generated, signifying the conclusion of ESSER I monitoring.



Questions?

We would appreciate your time in completing the survey for today's presentation below:

ESSER I Monitoring Survey (smartsheet.com)

Contact Information

If you have any ESSER I monitoring questions, please email essermonitoring@mdek12.org



Thank you!

forvis.com

The information set forth in this presentation contains the analysis and conclusions of the author(s) based upon his/her/their research and analysis of industry information and legal authorities. Such analysis and conclusions should not be deemed opinions or conclusions by FORVIS or the author(s) as to any individual situation as situations are fact specific. The reader should perform its own analysis and form its own conclusions regarding any specific situation. Further, the author(s) conclusions may be revised without notice with or without changes in industry information and legal authorities.

FORVIS has been registered in the U.S. Patent and Trademark Office, which registration is pending.



Assurance / Tax / Advisory