

Oklahoma State Department of Education



Consolidated Federal Programs Desk and Site Monitoring Plan

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Oklahoma State Department of Education
2500 North Lincoln Boulevard
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Titles I, II, VI, and X
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Consolidated Federal Programs Desk and Site Monitoring Plan



Section A

Overview:

Local educational agencies, (LEAs) receiving funds from a federally funded source, must participate in a monitoring process required by the United States Department of Education (USDE) as an accountability component of *No Child Left Behind Act* (NCLB). The provision of federal grant monitoring enables state educational agencies to work in close collaboration 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, in behalf of their various federally funded programs. Ultimately, it is the primary grantee's responsibility to ensure that federal funds are spent according to the prescribed federal program requirements.

Throughout the monitoring process, provision for timely, high-quality technical assistance is performed for the LEAs by federal programs staff members. Technical assistance serves the purpose of assisting school districts in reaching and maintaining compliance standards. Technical assistance may address issues such as: fiscal and budgetary issues, alignment of budgets with district plans, personnel issues and the School Personnel Records System (SPR), comparability, transferability, maintenance of effort, proper maintenance of inventories, vendor contracts, highly qualified teachers and the Oklahoma Teacher Credentialing System (OTCS), class-size reduction teachers, qualifications of paraprofessionals, professional development, parental involvement, Homeless children, private schools, schoolwide and targeted assistance programs, and Supplemental Educational Services. Technical assistance is provided by Oklahoma State Department of Education (OSDE) staff members in a collaborative manner for district superintendents, federal programs officers, and external federal programs consultants.

When monitoring is performed and findings are identified, corrective action is requested by the OSDE monitoring staff in written form, accompanied with a reasonable timeline for submitting the correction. Districts should perform the required corrective action in the time established for completion. Failure to perform follow-through for the correction action requirement could lead to more serious findings, keeping in mind that both the subrecipient, LEA, and the pass-through entity, OSDE, are liable for maintaining compliance requirements. (*OMB Circular A-133 Compliance Supplement*)

OSDE's monitoring staff maintains files for each subrecipient that contain copies of the various forms of documentation requested for the monitoring process. Such documents must align with the monitoring document checklist that has been provided for the LEAs in the initial monitoring packet. The file may also contain such information as notes collected or follow-up letters sent in response to on-site visits or desk monitoring. Files may contain communication logs and perhaps e-mail communications initiated by the OSDE staff member and district personnel. Thus, a paper trail is created and maintained during the monitoring process.

The Office of Standards and Curriculum, Titles I, Part A/D, Title II, Part A, Title VI - REAP and RLIS and Title X, at the Oklahoma State Department of Education, has implemented a consolidated Federal program monitoring plan that includes the following grants:

- 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 B, Subpart 3, William F. Goodling Even Start Family Literacy Programs
- Title II, Part A, Improving Teacher and Principal Quality
- Title VI, Rural Education Achievement Program (REAP) and Rural Low-Income Program (RLIS)
- Title X, Part C, McKinney-Vento Homeless Education Assistance Act of 2001

Oklahoma's 531 school districts participate in the required monitoring process over a five-year monitoring cycle during which **all** districts participate in either a site or desk monitoring.

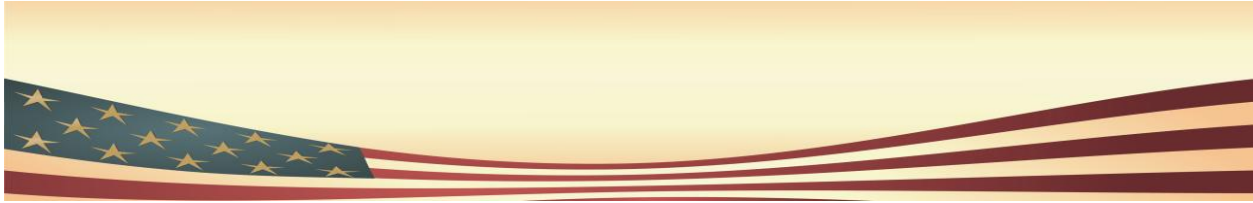
Risk Analysis Factors and the Monitoring Process:

The monitoring system is a vital internal control that ensures the integrity of federal funds. A highly important and effective component regarding monitoring is the inclusion of processes that align with what is described as the *Risk Management Factor*. This factor ensures that high priority monitoring is conducted on an annual basis, and is required for those grant subrecipients included within the high-risk category. The following factors are included when considering risk management:

- Districts for which the OSDE has received a written complaint
- Districts that experience recurring problems unique to the program
- Districts with greater percentages of awarded funds
- Districts with schools identified for improvement, corrective action or restructuring
- Districts identified for improvement, corrective action, or restructuring
- Districts that experience program-specific problems that may require change
- Districts that have submitted claims reflecting unallowable expenditures
- Districts with history of past audit findings on specific indicators
- **All** Districts are monitored on a five-year cycle

The risk analysis process emphasizes accountability and transparency for using resources wisely and focuses on the results of district implementation of the *No Child Left Behind Act of 2001* (NCLB) requirements.

Definition, Goals, Process



Section B

Monitoring Defined:

Monitoring is the examination of a district's administration and implementation of a federal education grant to: 1) assure compliance with applicable federal requirements; and 2) that district performance goals are being achieved as stated in Education Department General Administrative Regulations. (*EDGAR Section 80.40.*)

Monitoring supports the alignment of state and local efforts with the principles of NCLB. Monitoring provides the data necessary to make educational improvements and holds districts accountable for ensuring that all students reach proficiency or above in reading and math by 2014. OSDE's monitoring efforts are designed to focus districts' efforts when implementing the critical requirements of NCLB.

Monitoring Goals:

There are a variety of methods primary grantees can utilize when overseeing the subrecipients' compliance and performance requirements. OSDE has developed and implemented monitoring tools that are utilized each year that effectively monitor subawards. OSDE determines which tools will work best for each program monitored. OSDE staff members are provided training on how to perform effective monitoring. Listed below are the major goals included in OSDE's monitoring process:

- To provide on-going oversight and monitoring of federal grants.
- To develop a grant monitoring program that will meet the specifics of *G.S. 143-6.2* and *OMB Circular A-133* and document compliance with program requirements.
- To assure the achievement of the intended purposes of the various grants for which the department is responsible.
- To identify and track grant results.
- To identify the technical assistance needs of staff and grantees.
- To ensure timely expenditure of grant funds.
- To prevent fraud and abuse.
- To identify innovative tools and techniques for the achievement of grant objectives.

Monitoring Process:

OSDE's monitoring process consists of two major components that assist districts in their efforts in building capacity for improved student achievement and ensure program compliance:

- The desk monitoring, and
- The on-site monitoring.

OSDE program specialist(s) collect data during the desk and on-site monitoring to determine *compliance* with the monitoring indicators listed in the monitoring notification letter and the monitoring checklist. Monitoring outside of the scheduled cycle may be required if a district has serious or chronic compliance problems or has unresolved issues identified during the monitoring process.

Process Number One: The Desk Monitoring

Each district chosen for desk monitoring receives the following items:

- Initial monitoring notification letter
- Monitoring checklist of required forms of documentation
- Monitoring timeline

Each district is assigned to a program specialist who functions as the district contact, and is primarily responsible for providing technical assistance concerning all monitoring processes. One of the most important functions of the program specialist is organizing the desk monitoring process and performing the appropriate follow-through for each assigned district. Desk monitoring include an examination of specific program information. In conducting the desk monitoring, the district must complete the following and submit to the appropriate program specialist:

- The local school district should collect and organize all required forms of documentation. They may observe that as they perform this process that all required documents are in place. District personnel should proceed by performing a review and analysis of those documents for the purpose of determining the degree of quality and clarity demonstrated for reaching compliance standards before submitting to OSDE.
- When the district determines the required documents are found to meet compliance standards, they are then prepared to submit the documentation to OSDE.
- In some cases, local school districts may find one or more documents are missing or incomplete; therefore, they should determine how to effectively create or revise the document in a timely manner. At this point, they should determine the process for revision and correction before documents are submitted to OSDE.

Performing the Monitoring of District Information:

OSDE performs the monitoring of district information in the following manner:

- OSDE staff reviews all forms of the required district documentation submitted for the desk monitoring.
- OSDE's review aligns with indicators included within USDE's Student Achievement and School Accountability (SASA) documents for specific federal program review requirements. This document highly influences the results of the monitoring, and is the model for accountability and transparency.
- OSDE's reviews are detailed, addressing each critical area of the law required.
- As the review is performed, OSDE staff look for a demonstration of appropriate NCLB processes included within each document submitted; for example, every

schoolwide plan should contain **all** of the specific components of a schoolwide plan before the plan can be considered to meet compliance standards.

- Each document reviewed either meets standards, needing no revision, or does not meet standards, and requires some form of corrective action; for example, a school district may distribute the NCLB Report Card to parents by utilizing one method; however, as required by NCLB, they failed to address **multiple** ways of distributing this information.
- OSDE staff provides information about changes in policies and guidance in the form of technical assistance, and identifies potential or existing problem areas.
- OSDE staff performs follow-up after the desk monitoring has been completed.

After the desk monitoring has been performed, the program specialists may offer technical assistance via fax, e-mail, and phone conversations to assist the district in achieving compliance status.

Process Number Two: The On-Site Monitoring

Each district selected for an on-site monitoring receives the following items:

- Initial monitoring notification letter with date of site visit
- Monitoring checklist for required forms of documentation to be monitored
- Monitoring timeline

When conducting the on-site monitoring, the districts need to complete the following processes and have the items prepared and organized for the monitoring:

- Gather and organize all program specific documentation requested in the monitoring notification letter.
- Ensure that the district superintendent or authorized representative be available during the monitoring visit.

A team of two or more OSDE program specialists are assigned to conduct on-site monitoring. The size of the team assigned to perform the site visit will vary depending on the size of the district, issues identified, and programs applicable to the district. On-site monitoring will take anywhere from a few hours to multiple days as needed to properly monitor district records in regard to meeting all applicable program requirements.

During the on-site visit, OSDE program specialists monitor all appropriate documentation including information requested in the monitoring notification letter, and will interview district staff, principals, teachers, parents, and other stakeholders, both individually and in groups, as appropriate. This multilevel interview strategy allows the program specialist(s) 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 district and school level.

At the conclusion of the site monitoring the OSDE staff discusses preliminary results. After the on-site visit, the program specialists will offer technical assistance via fax, e-mail, and phone conversations to assist the district in achieving compliance status. Program specialists provide a formal monitoring report to the district in a timely manner and provide appropriate follow-up for all corrective action requirements.

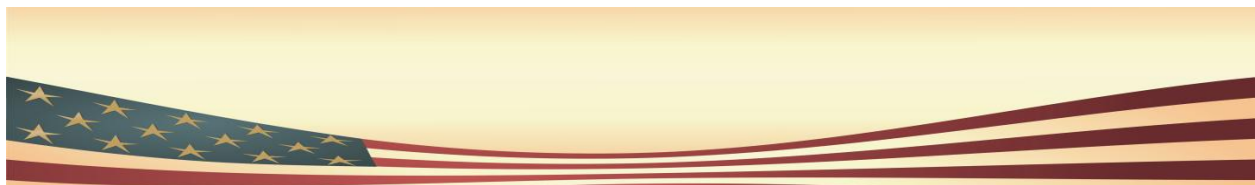
District Response to Monitoring Recommendations:

Upon receipt of the monitoring report, the district should respond to any *findings* (items not meeting requirements) by the established timeline. Districts are held accountable for submitting all corrective action responses by the assigned due date. Corrective action responses are then carefully reviewed by OSDE staff to ensure that all compliance issues identified in the monitoring report have been thoroughly addressed.

OSDE's Response to Corrective Action Requirements:

When necessary, the team leader schedules a follow-up visit or communicates with the district for the purpose of discussing the corrective action requirement for the purpose of verifying the implementation of required corrective actions and to provide technical assistance as necessary.

Closure Statements



OSDE has consistently developed and performed subrecipient monitoring requirements as set forth by the USDE. OSDE administers the monitoring process on an annual basis according to a specific 5-year monitoring schedule. OSDE has worked hard in its efforts to provide effective and efficient monitoring processes that demonstrate accountability and transparency for the purpose of maintaining integrity for all federally funded programs.

EDGAR, Section 80.40, requires grantees to monitor their subgrantees to ensure compliance with applicable federal requirements, and that performance goals are achieved. Grantees are ultimately responsible for managing the day-to-day operations of all federally funded activities. All LEAs must ensure that all expenditures and activities are indeed allowable, and all findings are addressed and applied.