

Consolidated Federal Programs Monitoring Procedure



Overview and Authority

The Vermont Agency of Education (SEA) has oversight and monitoring responsibilities to review compliance within the Federal *Elementary and Secondary Education Act* (ESEA) the current authorization of which is the *Every Student Succeeds Act*. Consolidated ESEA programs include: Title I, Part A; Title I, Part D; Title II, Part A; Title III, Part A; Title IV, Part A, and the McKinney Vento Act.

The General Education Provisions Act (GEPA) requires that states “adopt and use proper methods of administering each applicable program, including monitoring of agencies, institutions, and organizations responsible for carrying out each program.” Monitoring procedures must be designed to promote the recipients progress in achieving program goals and objectives; adherence to laws, regulations and assurances governing the program and conformity to the approved application performance reports or other relevant documents. Likewise, Education Department General Administrative Regulations (EDGAR) requires the SEA to monitor grants “to assure compliance with applicable Federal requirements and that performance goals are being achieved.” In short, the VTAOE must monitor for results; compliance with the law; and to protect against waste, fraud and abuse.

Monitoring Process Overview

The Consolidated Federal Program’s (CFP) team at the Vermont Agency of Education is comprised of various Title representatives. The primary Titles that will be monitored within your LEA (SU) on this visit are Title IA, Title IIA, Title IIIA and Title IVA and the McKinney Vento Act.

Monitoring will be conducted each year in selected supervisory unions/supervisory districts (SU/SD). Monitoring visits will be conducted on site and will preceded by a pre-visit request for documents, typically two-four weeks before the scheduled visit. Generally, CFP monitoring teams will be comprised of members from the CFP Work Group. The CFP monitoring process has two goals:

- 1) To maximize use of resources to benefit student learning
- 2) To ensure accountability to the law through a focus on results

Monitoring will cover requirements specific to Title IA, Title IIA, Title IIIA and Title IVA and the McKinney Vento Act. Also, monitoring will cover questions of a more systemic nature, as it is expected that decisions on how Title funds are expended are made within the framework of a greater strategic plan and needs assessment. The process is not intended to be an exhaustive review or to ensure compliance with each and every legal requirement. Rather, it is designed to verify compliance with major items of the law as well as to assist the SU/SD in improving student outcomes using federal dollars.

CFP Monitoring Process

Area	Focus	Action
Pre Visit Desk Audit	Questioning	<ul style="list-style-type: none"> ▪ VTAOE will contact SU/SD to clarify expectations and to set a schedule ▪ SU/SD uploads to SharePoint pre-visit documents to VTAOE two-four weeks before visit ▪ VTAOE completes “desk audit” prior to the visit
Visit	Information Gathering	<ul style="list-style-type: none"> ▪ Visiting team goes to the SU/SD ▪ Meetings, questions, and dialogue occur with supervisory union staff and others ▪ School visits includes questions and conversation with the principal, teachers, and others as needed ▪ Exit Interview with supervisory union / supervisory district staff & others
Post-Visit	Assessment and Action	<ul style="list-style-type: none"> ▪ Additional desk review and interviews as needed ▪ Report generated by team that includes recommendations and findings ▪ SU/SD responds to a draft report ▪ Final report is issued with a cover letter
Follow-Up	Results	<ul style="list-style-type: none"> ▪ Follow-up discussions/meetings continue between SU and monitoring team as needed ▪ SU/SD responds to findings by deadlines ▪ Required actions are completed ▪ Recommendations are implemented as desired ▪ A final letter is sent once all required actions are met.

Pre-Visit and Visit

Throughout the process, the team will seek to gather evidence. Evidence is gathered through written documentation as well as through interviews. Evidence might well include: LEA and school policies, letters to parents, meeting minutes, web-based information, planning documents, emails, reports, and grant applications. Documentation that the visiting team plans to review is listed in the various sections of the monitoring document. With regard to evidence, it is quality of the information related to a monitored area that is important, not quantity.

Before each visit, the team will request a number of documents from the SU/SD. A list of the documents is attached. The SU/SD will be asked to upload the documents to VTAOE's SharePoint site. Instructions on how to accomplish this will be given to the SU/SD CFP team leader. In addition before the visit, the SU/SD is asked to complete a "self-assessment," by responding and commenting on the guiding questions in the monitoring document.

For the on-site visit, the team, in consultation with SU/SD staff will set up a visit schedule and agenda. Typically this includes an entrance interview with supervisory level staff, followed by school visits and interviews with school based staff including principals, teachers, and paraprofessionals. Interviews will follow the Title I/IIA/McKinney Vento monitoring criteria (attached).

At the conclusion of the visit, an exit interview will be conducted with staff to share preliminary responses. This will be the first SU/SD opportunity to correct any misinterpretations or misperceptions that the team may have formed during the visit.

Post Visit and Follow-Up

After the visit, the team will send a draft report within 30 days for the SU/SD to comment on or formally accept. The SU/SD will be given at least one week to respond. This is the second SU/SD opportunity to correct misinterpretations and or misconceptions formed during the team's time on-site. Once finalized, the formal report will include findings and recommendations, with descriptions of any required actions necessary. Findings are corrective actions needed to bring supervisory unions, districts and schools into compliance with the law. Recommendations are not required, but rather suggested action steps for SU/SD consideration.

The SU/SD will be given dates to accomplish the required actions. Once those are done and meet the requirements of the law, the visiting team will send a final letter informing the SU/SD that all compliance issues have been resolved satisfactorily.