

Financial and Programmatic Monitoring Protocol

ESEA/Act 807

ACSIP



**Arkansas Department of Education
Division of Public School Accountability
Four State Capitol Mall
Little Rock, Arkansas 72201
<http://arkansased.org/>**

The *Elementary and Secondary Education Act* (ESEA) requires that the Arkansas Department of Education (ADE) establish a system to monitor the operation of Federal programs in every participating Local Education Agency (LEA), including charter schools. In addition, Arkansas' Act 807 of 2007 mandated that the monitoring process be expanded by the ADE to include a periodic monitoring review of the LEA's and school's implementation of programs supported by State Categorical funds. Any district or charter school may be monitored at the discretion of the Commissioner of Education.

ADE's monitoring review system is based on a careful review of all Federal and State requirements. The Financial and Programmatic Monitoring of ESEA /Act 807 is conducted via on-site visits to Arkansas school districts. Federal and State Categorical programs are also monitored through the application and financial reporting approval processes. Each district receiving funds from any of the entitlement programs will be monitored at least once every six years with an on-site visit. In addition, the ADE may perform on-site monitoring of districts that have been identified as high risk due to significant accountability and/or compliance issues. These LEAs may be monitored outside of the scheduled cycle if a district has serious or chronic compliance problems, has unresolved issues identified from a previous on-site monitoring, or at the discretion of the Commissioner of Education.

The Monitoring Guide is presented as a checklist that can be used by LEAs to ensure programs are operating in compliance with the law and guidance. Compliance indicator items were selected from among Federal entitlements and State categorical program requirements to ensure that the review covers all major aspects of the law and the monitoring focuses - to the extent feasible - on matters most related to the educational purposes of ESEA. It is not designed to cover all evidence requirements but is designed to include a review of samples of documented evidence of compliance. The LEA is responsible for operating all of the Federal and State funded programs in compliance with all applicable rules and regulations and in accordance with the assurances and terms of each individual grant award.

Monitoring Team:

A team of ADE staff members, together with any necessary program area staff, will conduct a Comprehensive Program Review in the school district or charter school. The size of the team and the number of days in the visit will vary depending on the size of the LEA and the number of programs to be reviewed.

Monitoring Process:

A. Prior to the On-Site Review:

- The Office of Public School Accountability with the superintendent or designee establishes a proposed schedule of activities. Districts are contacted via email or phone approximately six weeks prior to the monitoring visit.
- A follow-up monitoring notification letter, including the process and checklist of items to be monitored, is sent to the district approximately four weeks prior to the visit confirming the dates and schedule.
- The superintendent or designee ensures that documentation is readily available and organized. Some documents **may** be requested prior to the visit. Documentation and samples will become the items listed in the evidence column of the Monitoring Guide completed by the ADE monitors on-site.
- All district and school(s) electronic applications (including budgets) from the **ACSIP Application and Financial Reporting Approval Processes** are reviewed by the ADE monitors to ensure that all components are apparent and appropriate within the plans. State categorical and Federal expenditures are also reviewed in APSCN for compliance.
- A review of the applicable components of the district and school(s) websites is conducted by the ADE and is also used as a resource for gathering information.

B. During On-Site Review:

- **Entrance Conference:** An entrance conference is held with the superintendent and other district personnel that the superintendent may deem appropriate. The meeting acquaints staff with the team and provides an opportunity to familiarize district staff with the purpose and goals of the visit.
- **Review:** Interviews with appropriate program personnel or staff members and a review of additional documentation gathered is conducted on-site. Depending on the programs being reviewed, this may also include interviews with nonpublic school staff, multi-district projects members, parents and representatives of other agencies. All Participants to be involved in the visit will be identified during preliminary planning by the LEA and the Monitoring Team Leader.
- **Exit Conference:** At the end of the on-site visit, the monitoring team will hold an exit conference with the superintendent and other district personnel that the superintendent may deem appropriate. The ADE monitoring team will summarize the monitoring activities, the potential findings, recommendations and the timeline for developing the monitoring report. The monitoring team leader from the ADE should emphasize that the information presented at the exit conference is preliminary and explain that during the development of the monitoring report, the team will continue to review data collected during the on-site visit.

Reports/Responses:

The ADE monitoring team will provide monitoring reports as outlined below.

Within twenty (20) business days of the exit conference, a written draft of the monitoring report consisting of preliminary findings will be issued to the superintendent. The superintendent or designee should review the report for factual accuracy. Where requirements are found to be non-compliant, the district or charter school will be advised of appropriate corrective actions to bring those areas into compliance with the relevant statutes and regulations.

The LEA will have thirty (30) working days to complete and submit the necessary documentation listed in the corrective actions. Documentation/evidence received from the LEA during this time will be reviewed for compliance. If all documentation is deemed complete and compliant, a Final Report will be issued within sixty (60) business days of the exit conference.

In the event all issues are not resolved and non-compliance still exists, an Interim Status Report may be issued, the LEA will be contacted, and an additional meeting may be scheduled to discuss the unresolved issues. During that meeting or subsequent monitoring visit, it may be necessary to create a more formal Corrective Action Plan to assist the district in achieving compliance and to achieve closure to the process. The district will be required to respond to any unresolved issues within 30 days of receipt of the Interim Status Report.

An LEA that does not respond to the report within the established timeline or fails to comply with the corrective action plan will have a condition placed on the program's grant award by ADE, which may include an interruption of funds.

School districts and charter schools must demonstrate effective resolution of noncompliance identified by the ADE as soon as possible, but in no case later than August 15 of the subsequent year in the case of fiduciary findings.