

**NEW HAMPSHIRE PUBLIC SCHOOLS  
SCHOOL ADMINISTRATIVE UNIT #1**

**CONTOOCCOOK VALLEY SCHOOL DISTRICT  
OFFICE OF THE SUPERINTENDENT OF SCHOOLS  
106 Hancock Road, Peterborough, NH, 03458-1197**

Kimberly Rizzo Saunders, CAGS  
Superintendent of Schools  
[ksaunders@conval.edu](mailto:ksaunders@conval.edu)

Ann Forrest, Ed.D.  
Assistant Superintendent of Schools  
[afortrest@conval.edu](mailto:afortrest@conval.edu)

November 4, 2021

Jessica Lescarbeau  
State of New Hampshire  
Department of Education  
101 Pleasant St.  
Concord, NH 03301-3860

Jessica,

It was a pleasure working with you and Lindsey as we are always appreciative of guidance and suggestions for improvement. We have initiated corrective action and anticipate being within compliance prior to the March deadline. I'm including evidence documentation with the enclosed corrective action plans.

Will you provide feed back to the initial response or do you wait for the corrective action to be complete?

Thank you,



Lori Schmidt  
Business Administrator

Educating the Children of:  
Antrim, Bennington, Dublin, Frankestown, Greenfield, Hancock, Peterborough, Sharon, Temple

Telephone (603) 924-3336 Fax (603) 924-6707  
[www.conval.edu](http://www.conval.edu)

**NHDOE Federal Funds Monitoring  
Corrective Action Plan**

*(Use a separate form for each Corrective Action Item)*

**Subrecipient contact:**        **Lori Schmidt**

**Subrecipient:**                **SAU 1 / Contoocook Valley School District**

**Action Item:**                **Finding #01**

**Description:**                **The non-Federal entity must (a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).**

**Date:**

Please check the box that most appropriately matches the District's status in implementing the Corrective Action Plan (CAP). Please also provide any documentation that supports the District's assertion that the CAP has been fully implemented.

- (1) Partially implemented
- (2) Revised CAP being implemented
- (3) Fully implemented
- (4) No further action required (provide detailed explanation below):

Lori Schmidt

11/4/21

Name of person completing this form

Date

If options (1) or (2) are selected, please explain the implementation status &/or how the CAP was revised as well as the anticipated completion date in the space below:

Board Policy DAF was presented for a first read on November 2, 2021. Administration is in the process of writing process and procedures to ensure appropriate implementation of internal controls for managing grant funds. Policy and Board agenda are attached.

Corrective Action Plan Update or other explanation as necessary, (status date:    /    /    )

If option (3) is selected, please explain how this was implemented in the space below:

***Please return to the Bureau of Federal Compliance within 30 days of receipt.***

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**OFFICE OF THE SUPERINTENDENT OF SCHOOLS**

**106 Hancock Road**

**Peterborough, New Hampshire**

**CONTOOCOOK VALLEY SCHOOL BOARD**

**School Board Meeting**

**Tuesday, November 2, 2021**

**7:00 p.m.**

**Physical Location: SAU #1 Board Room**

**Livestream Link: <https://www.youtube.com/watch?v=tHerLRrX1GU>**

**Agenda**

- 1. Call to Order and Pledge of Allegiance**
- 2. Points of Pride**
- 3. Public Comment**
- 4. Non-Public Session: RSA 91-A:3,II (If Required)**
  - a. Legal**
- 5. Consent Agenda**
  - a. Acceptance of School Board Meeting Minutes**
    - 1) October 19, 2021 (pg. 1-4)
  - b. Personnel**
    - 1) Co-Curricular Notifications (pg. 5-6)
- 6. Superintendent's Report and Presentation of Business**
  - a. Reopening Update**
  - b. Learning Recovery Presentation**
  - c. Monthly Events Calendar (pg. 7-8)**
  - d. November 1<sup>st</sup> Enrollment Update**
- 7. Reports**
  - a. Teacher Representative – Cheryl Jessie**
  - b. Strategic Plan Committee – Tim Theberge**
  - c. Equity Committee – Rich Cahoon**
  - d. Selectmen's Advisory Committee – Tim Theberge**
  - e. Policy Committee – Katherine Heck**
- 8. Old Business**
  - a. Legislative Update**
  - b. 5<sup>th</sup> Board Goal Discussion**
- 9. New Business**
  - a. Policy - 1<sup>st</sup> Read (pg. 9-13)**
    - IGE: Parental Objections to Specific Course Material
    - DAF: Administration of Federal Grant Funds
    - EEAEA: Mandatory Drug and Alcohol Testing – School Bus Drivers and Contracted Carriers
- 10. Public Comment**
- 11. Approval of Manifests (Board Vote Required)**
- 12. Non-Public Session: RSA 91-A: 3, II (If Required)**
  - a. Negotiations**
  - b. Legal**
  - c. Personnel**

## **DAF -ADMINISTRATION OF FEDERAL GRANT FUNDS**

All funds awarded directly or indirectly through any federal grant or subsidy programs shall be administered in accordance with this policy, and any administrative procedures adopted implementing this policy.

The School Board intends to administer federal grant awards efficiently, effectively and in compliance with all requirements imposed by law, the awarding agency and the New Hampshire Department of Education or other applicable pass-through entity.

This policy establishes the minimum standards regarding internal controls and grants management to be used by the District in the administration of any funds received by the District through federal grants programs as required by applicable New Hampshire and federal laws or regulations including, without limitation, the Uniform Grant Guidance.

The Board directs the Superintendent or designee to develop, monitor and enforce effective administrative procedures and other internal controls over federal awards as necessary in order to provide reasonable assurances that the District is managing the awards in compliance with all requirements for federal grants and awards.

Systems and controls must meet all requirements of federal and/or law and regulation and shall be based on best practices. The Superintendent is directed to assure that all individuals responsible for the administration of a federal grant or award shall be provided training sufficient to carry out their duties in accordance with all applicable requirements for the federal grants or award and this policy.

To the extent not covered by this policy, the administrative procedures and internal controls must provide for:

1. identification of all federal funds received and expended and their program source;
  2. accurate, current and complete disclosure of financial data in accordance with federal requirements;
  3. records sufficient to track the receipt and use of funds;
  4. effective control and accountability over assets to assure they are used only for authorized purposes;
- and
5. comparison of expenditures against budget.

Notwithstanding any other policy of the District, all funds awarded directly or indirectly through any Federal grant or subsidy programs shall be administered in accordance with this Policy and the administrative procedures developed to accompany this policy.

DAF-1-R ALLOWABILITY

DAF-2-R CASH MANAGEMENT AND FUND CONTROL

DAF-3-R PROCUREMENT

DAF-4-R PROCUREMENT – ADDITIONAL PROVISIONS PERTINENT TO FOOD SERVICE PROGRAM

DAF-5-R CONFLICT OF INTEREST AND MANDATORY DISCLOSURES

DAF-6-R INVENTORY MANAGEMENT - EQUIPMENT AND SUPPLIES PURCHASED WITH FEDERAL FUNDS

**NHDOE Federal Funds Monitoring  
Corrective Action Plan**

*(Use a separate form for each Corrective Action Item)*

**Subrecipient contact:**        **Lori Schmidt**

**Subrecipient:**                **SAU 1 / Contoocook Valley School District**

**Action Item:**                **Finding #02**

**Description:** The acquisition of property or services which is higher than the micro-purchase threshold (\$10,000 at the time of the grant in question), but does not exceed the simplified acquisition threshold (\$250,000 established in the Federal Acquisition Regulation) must follow small purchase procedures. Small purchase procedures include price or rate quotations obtained from an adequate number of qualified sources as determined appropriate by the non-Federal entity. Additionally, the current policy, "DJE- Bidding Requirements", as adopted by the ConVal School Board reads that "all contracts for, and purchases of supplies, materials, equipment, and contractual services in the amount of \$15,000 or more, shall be based, when feasible on at least three competitive bids."

**Date:**

Please check the box that most appropriately matches the District's status in implementing the Corrective Action Plan (CAP). Please also provide any documentation that supports the District's assertion that the CAP has been fully implemented.

- (1) Partially implemented
- (2) Revised CAP being implemented
- (3) Fully implemented
- (4) No further action required (provide detailed explanation below):

Lori Schmidt  
Name of person completing this form

11/4/21  
Date

If options (1) or (2) are selected, please explain the implementation status &/or how the CAP was revised as well as the anticipated completion date in the space below:

The District is reviewing and updating financial policies and the procurement policy will comply with Federal acquisition requirements. Beginning with our 2020-21 IDEA grant, we implemented the use of a justification for sole source documents. A sample is attached.

Corrective Action Plan Update or other explanation as necessary, (status date:    /    /    )

If option (3) is selected, please explain how this was implemented in the space below:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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## **2020-2021 Justification for Constellations Services (Sole Source)**

Constellations provides BCBA services for our programs and students by providing unique staffing solutions that meet our needs. We have a model that requires inclusive behavioral support that is a combination of consultation and instructional supports, training, direct services, assessment and intervention services. We have several structures and programs that Constellations staff are trained in and familiar with that has taken multiple years to help build the model and system. This includes support for our Emotional Support Program (ESP) for students with emotional and behavioral needs; students with Autism and Developmental needs; and our BEST Intervention Model and Team.

The BEST Team consists of district special education coordinators and Constellations staff, including a Constellations team lead. This team reviews intervention referrals, plans supports, and performs student and program fidelity checks and progress monitoring. Constellations provides fidelity and inclusion checks and monitoring that align with our programs. We have specific District paraprofessionals that work within the two BCBA Models. There is not another program that can meet these needs locally, and contracting with another program or individual BCBA would not provide the programmatic consistency we need for the growth of our models. While some of the behavioral services with the model are direct consultation and direct services to students, the system they support acts as a mobile response team to provide support to students in need of emotional and behavioral support in alignment with our BEST Model.

A review of other programs indicate that they can provide ABA therapy and evaluation supports, but not integrated, inclusive staffing solutions across our schools and programs.

The model this year is three mobile teams:

### **BEST Team**

#### **BEST Instructional Model**

BCBA - ABA Instructor - BEST Paraeducator (Special Education)

#### **Autism/Developmental Disabilities**

BCBA - ABA Instructor - Autism Paraeducator (Special Education)

#### **BEST General Education Intervention Model**

BCBA Behavior Paraeducator (General Education)