

Frank Edelblut  
Commissioner



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Deputy Commissioner

STATE OF NEW HAMPSHIRE  
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October 21, 2022

Robert Malay  
Superintendent, SAU 29  
193 Maple Avenue  
Keene, NH 03431

Dear Superintendent Malay:

This letter is to summarize and report on the July 14, 2022 FY22 ESSER programmatic monitoring of Marlborough School District. I want to thank your team for the cooperation and hard work leading up to the monitoring.

Enclosed is a comprehensive summary of the FY22 ESSER programmatic monitoring at Marlborough School District including findings and necessary corrective actions. Your plan to address each finding must be presented to the NHED in writing. A Corrective Action Plan template and Evidence Submission template are attached to this report, and the LEA will need to complete these documents and attach substantiating evidence per the instructions. LEAs will have up to 90 days from receipt of this report to demonstrate compliance in any areas that were found to be in violation of state or federal requirements. Please send all required corrective action and evidence submissions to the attention of Ellen Podgorski at the Division of Learner Support.

Report Summary				
Requirement	Status	Page Number	Corrective Action Plan Due	Evidence Submission Due
1. Allowability	Met Requirements	2	N/A	N/A
<b>2. Learning Loss</b>	<b>Finding (1)</b>	<b>3</b>	<b>11/22/22</b>	<b>1/24/23</b>
3. Equitable Services	Met Requirements	3	N/A	N/A
4. Continued Payment	Met Requirements	4	N/A	N/A
5. Maintenance of Equity	N/A	4	N/A	N/A
6. Construction	N/A	4	N/A	N/A
Activity Review	Met Requirements	5	N/A	N/A

We consider this process a partnership. Please do not hesitate to seek technical assistance from me or from anyone within the Division of Learner Support. The goal is to make sure that students and staff are receiving the benefits of the COVID-19 Education Programs in accordance with requirements and regulations in an effective response to the challenges of the COVID-19 pandemic.

Sincerely,

*Ellen C. Podgorski*

Ellen C. Podgorski  
Program Specialist, COVID-19 Education Programs

Cc: Jessica Lescarbeau, NHED Administrator of COVID-19 Education Programs  
Marcy Frink, Staff Accountant, SAU 29

**FY22 ESSER Programmatic Monitoring Final Report on Required Evidence of Compliance**

**SAU 29 Marlborough School District (“LEA”)**  
**Monitoring Review Date: 7/14/22**

**Reviewer: Ellen Podgorski (“EP”)**  
**Final Report Date: 10/21/22**

**I. Requirement of Allowable Activities 2.C.F.R.200.403-475**

**Summary and Analysis:**

*Monitoring review staff assessed the LEA’s efforts to demonstrate that the LEA’s ESSER-funded activities are allowable, reasonable, and necessary and undertaken to prevent, prepare for, and respond to COVID-19.*

LEA presented and EP reviewed:

- 12/20/21 School Board meeting minutes, which show that staff presented details for the Board to review regarding ESSER grants. Members present were board members, principal, Superintendent, business manager. 6/22/21 School Board Meeting Minutes show discussion of summer school program, which had high attendance due to ESSER funds that allowed principal to increase academic offerings. Public input noted as “none.”
- 9/27/21 Principal’s Report, which shows focus on improved academic achievement, reading consultant, Edmentum, and summer school. School Board Meeting Minutes note that summer school was well attended and ESSER funds supported bussing, extra staffing, and supplies. Minutes include discussion about reading specialist, math consultant, and interventionist and indicate that math interventionist proposal would be presented at October meeting. Minutes include additional discussion regarding ESSER funds, timeline for spending, and board involvement. Public input noted as “none.” 10/18/21 Principal’s Report shows discussion of working with a reading consultant. 10/18/21 Board Meeting Minutes show discussion of data work, the Edmentum program, contact with a math interventionist, and the information that a reading specialist would begin the next week. Public input by one teacher about meeting location.
- 11/12/21, 12/20/21, and 1/24/22 Principal’s Reports, which includes update on reading consultant and Edmentum progress. 11/15/21 Board Meeting Minutes show that four members of the public were present. Minutes show discussion of math interventionist and program to lessen learning gaps.
- 1/24/22 Board Meeting Minutes, which include discussion of using ESSER funds for paraprofessional positions; math assessments through Edmentum; and recommendation to use paraprofessionals to address intervention needs. 2/28/22 Principal’s Report includes update on reading consultant work and data presentation on Edmentum diagnostics. 3/15/21 Principal’s Report includes attention to literacy and social/emotional wellness and discussion of ESSER II grant priorities: promethean boards, summer school program to address learning loss, math coach, and chrome books. 3/21/22 School Board Minutes note that eight members of the public were present. Minutes indicate update on English and math proficiency and continued use of ESSER funds for work on proficiency and summer school.
- 4/18/22 School Board Minutes show that 10 members of the public were present and that a presentation was made by a reading consultant. Minutes show discussion on use of ESSER funds for PD and enrichment programs and the need for strategic planning for funds. Minutes show discussion of learning loss requirement. 5/16/22 Principal’s Report includes update regarding reading consultant and Edmentum. 5/16/22 School Board Minutes show that five members of the public were present. Minutes show update on ESSER funds.
- ARP ESSER Use of Funds plan, which states that LEA surveyed stakeholders—principals, administrators, school faculty, staff, parents, community members, students, school counselors, social workers—to receive recommendations for use of funds. The survey assessed priorities for instruction, technology, and facilities.
- Narrative explanation to address how the LEA researched items for purchase; LEA stated that the process required administrators to initially research and present to stakeholders the investment and how it would impact one of the three buckets identified in the ESSER Information slide deck.

Findings: None

Evidence of Correction Needed: N/A

Corrective Action Plan Due Date: N/A

**II. Requirement to Address Learning Loss:** *Public Law 117-2 Sec. 2001*

Summary and Analysis:

*Monitoring review staff assessed the LEA's compliance with the use of at least 20% of ARP ESSER funds to address learning loss.*

In addition to the items listed in the Allowability section above, LEA presented and EP reviewed:

- SMART Goals for Reading Improvement for Kindergarten and grades 1-2; fall 2021-winter 2022 Tier Comparison Reports for reading and math for kindergarten through eighth grade; June data for school reading goals for kindergarten, first grade, and second grade; progress made from fall to spring in literacy, reading, numeracy, and math.
- An explanation that the configuration and size of the classrooms permitted all students in the LEA to be in school 100% of the time and that “learning loss due to COVID was not a factor in determining the interventions and resources that would be used to close student deficits.”
- Information regarding Edmentum Exact Path including a statement on research indicating that students can make significant learning gains with the tool.
- A statement that the LEA hired a neurology-based reading specialist to address areas of concern associated with reading, and that the LEA hired staff from within to cover the four weeks of ESY programming for students with an IEP that noted an extended school year opportunity.
- The 2021-2022 and 2022-2023 contracts for the reading specialist.
- A statement that 100% of the students who were expected to attend the four weeks of ESY attended.

Findings:

1. The LEA did not submit participation records such as attendance data for tutoring, after school, extended day, & summer programs.

Evidence of Correction Needed:

1. The LEA must submit participation records such as attendance data for tutoring, after school, extended day, & summer programs.

Corrective Action Plan Due Date: November 22, 2022

Fully Implemented Corrective Action Plan/Evidence of Correction Due Date: January 24, 2023

**III. Requirement to Provide Equitable Services** \*Applies to ESSER I funds only. *Public Law 116-136 Sec. 18005*

Summary and Analysis:

*Monitoring review staff assessed the LEA's compliance with providing equitable services in accordance with federal requirements.*

- The LEA is exempt from this requirement, as there are no non-public schools in the district.

Findings: N/A

Evidence of Correction Needed: N/A

Corrective Action Plan Due Date: N/A



**IV. Requirement for Continued Payment to Employees:** *Public Law 116-136 Sec. 18006; Public Law 116-260 Sec. 315*

Summary and Analysis:

*Monitoring review staff assessed the LEA’s compliance with federal requirements for continued payments to employees and contractors.*

- LEA presented and EP reviewed an attestation by the Business Manager stating that the LEA has continued to pay its employees as required.

Findings: None

Evidence of Correction Needed: N/A

Corrective Action Plan Due Date: N/A

**V. Requirement for Maintenance of Equity:** *Public Law 117-2 Sec. 2004*

Summary and Analysis:

*Monitoring review staff assessed the LEA’s compliance with Maintenance of Equity requirements.*

- The LEA is exempt from this requirement.

Findings: N/A

Evidence of Correction Needed: N/A

Corrective Action Plan Due Date: N/A

**VI. Construction Requirements:** *2 C.F.R.200, 34 C.F.R. 75.600-617, Davis-Bacon Act*

Summary and Analysis:

*Monitoring review staff assessed the LEA’s compliance with ESSER construction requirements.*

- The LEA has not undertaken any ESSER-funded construction projects.

Findings: N/A

Evidence of Correction Needed: N/A

Corrective Action Plan Due Date: N/A



**Activities Selected for Further Programmatic Review**

Summary and Analysis:

*Monitoring review staff selected ESSER-funded activities for which the LEA requested reimbursement for further review.*

CRRSA-ESSER Activity 112342 Reimbursement Requested November 2021: The LEA requested a reimbursement amount of \$665 for an activity including materials for working with a consultant to increase reading achievement. LEA presented and EP reviewed:

- Invoice and check paid for \$665 to David Kilpatrick Inc. dba Casey & Kirsch Publishers for Equipped for Reading Success (phonemic awareness program) and Essentials of Assessing, Preventing, and Overcoming Reading Difficulties (evidence-based reading interventions). The amount paid equals the reimbursement request amount of \$665.

CRRSA-ESSER Activity 101413 Reimbursement Requested November 2021: The LEA requested a reimbursement amount of \$130,777 for an activity including 22 updated interactive boards to be used in all instructional classrooms. LEA presented and EP reviewed:

- An invoice and check paid for \$130,777 to CCS Presentation System. The invoice includes the purchase of 21 SMART boards, warranty extension, learning suite extension, HDMI, USB, and installation.

ARP-ESSER Activity 113477 Reimbursement Requested April 2022: The LEA requested a reimbursement amount of \$12,500 for a contract with a reading consultant. LEA presented and EP reviewed:

- Invoices and check paid to CSS Consulting LLC for \$12,500; 2021-2022 contract with reading consultant; and 2022-2023 contract with reading consultant. Purchase order 24100261 includes a description of data and classroom support for two dates for the amount of \$5,000. Purchase order 24100261 includes a description of classroom support for three dates for total of \$7,500. Total amount of invoices equals the reimbursement request amount of \$12,500.

Findings: None

Evidence of Correction Needed: N/A

Corrective Action Plan Due Date: N/A

**NHED ESSER Programmatic Monitoring  
Corrective Action Plan**

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

**LEA Name:**

\_\_\_\_\_  
Name of person completing this form

\_\_\_\_\_  
Date

**Finding Number:**

**Description of Finding:**

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

- (1) Partially implemented
- (2) Fully implemented
- (3) No further action required (provide detailed explanation below)

If option (1) is selected, please explain the implementation status as well as the anticipated completion date in the space below:

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**Anticipated Completion Date:**

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If option (2) or (3) is selected, please explain how the plan was implemented or why no further action is required in the space below:

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***Please return to [Ellen.C.Podgorski@doe.nh.gov](mailto:Ellen.C.Podgorski@doe.nh.gov) at the Division of Learner Support***



**Evidence Submission  
FY22 ESSER Programmatic Monitoring**

Evidentiary requirement of the Corrective Action Plan submitted to NHED on: \_\_\_\_\_

Use the template below to describe the evidence the LEA is providing in response to each FY22 ESSER Programmatic Monitoring LEA Report finding and Corrective Action Plan. Attach sufficient evidence to substantiate each corrective action taken. Please return your signed Evidence Submission to the NHED Division of Learner Support no later than January 24, 2023.

**Learning Loss Finding 1:**

The LEA did not submit participation records such as attendance data for tutoring, after school, extended day, & summer programs.

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**Learning Loss Corrective Action 1:**

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**Learning Loss Evidence 1:**

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Evidence Submission presented by

\_\_\_\_\_  
Superintendent

\_\_\_\_\_  
Date