



New Hampshire

**Department of Education**

Federal Fiscal Monitoring Final Report  
Stoddard School District  
School Year 2019-2020

Provided by the NHDOE, Bureau of Federal Compliance

September 17, 2021

**Frank Edelblut**  
Commissioner



**Christine M. Brennan**  
Deputy Commissioner

**STATE OF NEW HAMPSHIRE  
DEPARTMENT OF EDUCATION  
101 Pleasant Street  
Concord, NH 03301-3860  
TEL. (603) 271-3494  
FAX (603) 271-1953**

September 17, 2021

Dr. Jacqueline Coe, Superintendent SAU 24  
Alfrieda Englund, School Board Chair  
258 Western Avenue  
Henniker, NH 03242

Superintendent Coe and School Board Chair Englund:

Thank you for assisting the New Hampshire Department of Education, Bureau of Federal Compliance (NHDOE, BFC) in the Federal funds onsite monitoring procedure for Stoddard School District/SAU 24, conducted on May 14, 2021 by Jessica Lescarbeau.

The attached report summarizes the information gathered during our visit and identifies our concerns relative to Federal grant fiscal compliance. Required corrective actions and associated timelines to rectify compliance issues are also included in the report. Also attached is the Corrective Action Plan (CAP). The CAP is for you to respond to the findings within the monitoring report. The CAP needs to be completed and sent back to the BFC no later than 30 calendar days after receiving the initial report via email.

If you have any questions or comments about the monitoring process and/or the resulting report, you are encouraged to contact Lindsey Labonville at [Lindsey.L.Labonville@doe.nh.gov](mailto:Lindsey.L.Labonville@doe.nh.gov) or 603.271.3837, or Jessica Lescarbeau at [Jessica.L.Lescarbeau@doe.nh.gov](mailto:Jessica.L.Lescarbeau@doe.nh.gov) or 603.271.3808.

Sincerely,

A handwritten signature in cursive script that reads "Jessica Lescarbeau".

Jessica Lescarbeau

cc:  
Caitlin Davis, Director, NHDOE Division of Education Analytics and Resources (via email only)

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Christopher Roy, Business Manager, SAU 24 (via email only)  
Lisa Davenport, School Board Vice-Chair, SAU 24 (via email only)  
Pamela Dionne, School District Treasurer, SAU 24 (via email only)  
Daniel Eaton, School District Moderator, SAU 24 (via email only)  
Christine Haase, School District Clerk and Secretary, SAU 24 (via email only)  
Cynthia Lake, School Board Member, SAU 24 (via email only)

## Federally Required Policies

<b>Policy</b>	<b>In Accordance With</b>	<b>Compliant</b>	<b>Comments</b>
<b>Drug-Free Workplace Policy</b>	34 CFR 84.200 and the Drug-Free Workplace Act of 1988	Yes	None
<b>Procurement Policy</b>	2 CFR 200.318-327	Yes	None
<b>Conflict of Interest/Standard of Conduct Policy</b>	2 CFR 318(c)(1)	Yes	None
<b>Inventory Management Policy</b>	2 CFR 200.313(d)	Yes	None
<b>District Travel Policy</b>	2 CFR 200.474(b)	Yes	None
<b>Subrecipient Monitoring Policy/Procedure (if applicable)</b>	2 CFR 200.331(d)	N/A	District does not have subrecipients therefore this policy is not applicable.
<b>Time and Effort Policy/Procedure</b>	2 CFR 200.430	Yes	None
<b>Records Retention Policy/Procedure</b>	2 CFR 200.333	Yes	None
<b>Prohibiting the Aiding and Abetting of Sexual Abuse Policy</b>	ESEA 8546	Yes	None
<b>Allowable Cost Determination Policy/Procedure</b>	2 CFR 200.302(b)(7)	Yes	None
<b>Gun Free School Act</b>	Gun Free School Act of 1994	Yes	None

**NHDOE’s review of the above policy/procedure documents is not intended to be all-inclusive. As such, there may be other federally non-compliance policies/procedures not addressed above. Ultimately, it is the District’s/SAU’s sole responsibility to meet any and all Federal compliance requirements as a recipient of Federal funds.**

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## District GMS Reimbursement Requests

In addition to reviewing District/SAU policies required by Federal law and rule, five (5) reimbursement requests for grant activities from the NHDOE Grants Management System (GMS) were selected for review. The selected activities were from the 2019-2020 school year and included the following Federal programs;

<i>Request #</i>	<i>Program</i>	<i>Project #</i>	<i>Month &amp; Year of Project</i>	<i>Activity #</i>	<i>Activity Cost</i>	<i>Activity Description</i>
1	CARES-ESSER	20204952	Nov-20	98167	\$976.99	Salaries and Benefits
2	Title I Part A	20200141	Oct-19	79971	\$363.32	Salaries and Benefits
3	Title I Part A	20200141	Oct-19	79970	\$874.44	Salary
4	Title II Part A	20200170	Jun-20	80074	\$877.32	Salaries and Benefits
5	Title II Part A	20200170	Dec-20	80073	\$1,727.15	Professional Services

During our review, multiple instances of non-compliance were identified. These findings include non-compliance caused by the District's/SAU's lack of federally compliant policies and procedures and non-compliance surrounding procurement methods. The details of our findings are listed below.

**Please note that our review of the District's/SAU's management of its Federally funded grant activities was limited to our analysis of the five GMS selections and was not designed to identify all potential deficiencies in Federal compliance that might exist. As such, other instances of non-compliance may exist that was not identified during the review process.**

## Findings

### *Finding #01*

**Criteria or specific requirements:** As a recipient of Federal funds certification of effort to document salary expenses charged directly or indirectly again Federally-sponsored projects is required. Time and effort reports shall; be supported by a system of internal controls which provide reasonable assurance that the charges are accurate, allowable, and properly allocated, be incorporated into the official records of the District, reasonable reflect the total activity for which the employee is compensated by the District, not exceeding 100% of the compensated activities, encompass both Federally assisted and other activities compensated by the District on an integrated basis, comply with the District's established accounting policies and practices, and support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award, a Federal award and non-Federal award, an indirect cost activity and a direct cost activity, two or more indirect activities which are allocated using different allocation bases, or an unallowable activity and a direct or indirect cost activity.

**Condition:** During our monitoring visit conducted on May 14, 2021, a review of multiple programs (as indicated in the table above) was conducted. During this review multiple instances of noncompliance surrounding time and effort documentation was found.

**Questioned Costs:** Questioned costs are listed by Program, Activity, and Month/Year below:

#### **Title I Part A**

Activity #79971 October 2019- \$363.32

Activity #79970 October 2019- \$874.44

#### **Title II Part A**

Activity #80074 June 2020- \$877.32

**Total Questioned Cost: \$2,115.08**

**Context:** The timesheets provided to show the time spent relative to the Programs and Grants in question does not meet all of the Federal requirements for such documentation. The documentation should include the following information; Grant, employee name, period of performance, signatures of the employee and supervisor, signatures dated after the period of performance, and a certifying statement. Additionally, time and effort documents weren't kept for all activities.

**Effect:** Any request(s) for reimbursement of personnel expenses must meet the requirements of 2 CFR 200.430.

**Cause:** A lack of controls surrounding the time and effort policy has led to this compliance concern and questioned cost.

**Requirement(s):** The NHDOE is requiring that the Stoddard School District update their time and effort documentation to ensure compliance. Additionally, we require that the Stoddard School District implement a time and effort procedure in accordance with 2 CFR Part 200.

## **Timeline and Evidence for Findings**

As the requirements of 2 CFR 200 went into effect approximately five years ago, it is imperative the District/SAU come into compliance with these regulations by April 1, 2022. As the pass-through entity for the Federal grant funds, it is the NHDOE's responsibility to assure compliance of its subrecipients. As such, the NHDOE is requiring the District/SAU to complete the above action as soon as possible.

### ***Finding #01***

Required Completion Date: April 1, 2022. The CAP is required to be returned to the NHDOE within 30 calendar days of the date of this report. Failure to meet this deadline may result in the NHDOE taking enforcement actions allowed under 2 CFR 200.

### ***Evidence of Completion***

Provide the NHDOE with a copy of the time and effort procedure, the newly created compliant document, and the District must retroactively come into compliance by ensuring the employees paid within the activities in question in 'Finding #01' sign the newly created document. A copy of these documents must be sent to the NHDOE via email.

**-END OF DOCUMENT-**

**NHDOE Federal Funds Monitoring  
Corrective Action Plan**

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

**Subrecipient contact:**

**Subrecipient:**

**Action Item:**

**Description:**

**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):

\_\_\_\_\_  
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:

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

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