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Department of Education

**New Hampshire Department of Education
Elementary and Secondary Education Act
Federal Programmatic Consolidated
Monitoring Plan Toolkit**

Bureau of Instructional Support

Office of ESEA Programs

25 Hall Street

Concord, NH 03301

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Purpose

The purpose of this document is to provide all subrecipients with information regarding the New Hampshire Department of Education (NHED), Office of Elementary and Secondary Education Act (ESEA) Programs Federal programmatic consolidated monitoring process for applicable Federal grant programs.

Monitoring Overview

NHED, as the State Educational Agency (SEA), must comply with applicable laws and regulations regarding all Federal awards. Likewise, all local educational agency (LEA) subrecipients receiving Federal awards must participate in a monitoring review process as an accountability component of the 1965 ESEA, as reauthorized in 2015 by the Every Student Succeeds Act (ESSA) [[ESSA § 9204 \(2015\)](#)]. A consolidated Federal grant monitoring program enables NHED to work collaboratively with LEAs by providing them with quality technical assistance for programmatic planning and implementation of all services, while allowing the LEAs to spend more time focused on the students, parents, teachers, and other school leaders. NHED staff in the Office of ESEA Programs provides technical assistance regarding laws, regulations, and guidance throughout the monitoring process. This assistance serves the purpose of supporting the LEAs in reaching and/or maintaining programmatic compliance. Fiscal compliance monitoring is addressed by the Bureau of Federal Compliance (BFC) at NHED.

A subrecipient is responsible for the day-to-day management of grant and subgrant supported activities to assure compliance. It is the LEA's responsibility to ensure that Federal funds are spent according to all Federal requirements. Additionally, all LEAs must grant access to documents related to the administration of the Federal grant and related activities for the SEA to review [[2 CFR § 200.337](#)].

NHED has established a comprehensive programmatic consolidated monitoring plan for subrecipients of Federal funds. The LEA subrecipients must submit for consideration and substantial approval a budget broken out by grant in the Grants Management System (GMS) before funds are reimbursed. NHED staff reviews the activities and associated budget submitted by the LEA to determine if funds are budgeted appropriately and the activity meets the requirements of the award (allowable, reasonable, necessary). Approved assurances (programmatic and general), equitable services affirmation (if applicable), and grant applications, properly certified by the LEA superintendent/board under the provisions of ESEA and ESSA, constitute an agreement between NHED and the LEA.

The Office of ESEA Programs consolidated programmatic monitoring review plan includes the following Federal grant programs:

- Title I, Part A, Improving the Academic Achievement of the Disadvantaged,
- Title I, Part D, Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk,
- Title II, Part A, Preparing, Training, and Recruiting High-Quality Teachers, Principals, and Other School Leaders,
- Title III, Part A, Language Instruction for English Learners and Immigrant Students,
- Title IV, Part A, Student Support and Academic Enrichment,
- Title IV, Part B, Nita M. Lowey 21st Century Community Learning Centers (21st CCLC),
- Title V, Part B, Subpart 1, Rural Education Initiative, Subpart 2, Rural and Low-Income School Program (RLIS), and
- Title IX, Part A, Education for the Homeless and Other Laws (McKinney Vento).

Subrecipient Risk Analysis Tool (RAT) Factors

[Title II of the Code of Federal Regulations, Part § 200.332](#) states that a pass-through entity must “evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring ...” Although the regulation does not dictate how the risk evaluation must be completed, it states that the risk evaluation may include consideration of such factors as the subrecipient's prior experience with the same or similar subawards, the results of previous audits, whether the district has new personnel or systems, and the results of Federal audits.

To comply with this requirement, NHED conducts a risk assessment of districts and charter schools receiving ESEA funds on a fiscal year basis. LEAs are categorized as either high-risk, moderate-risk, or low-risk. Based on the outcome of the risk assessment, at a minimum, high-risk LEAs are monitored. NHED strives to monitor all LEAs at least once every four years. The results of the risk assessment as well as the methodology can be found on the NHED website here: [ESEA Consolidated Monitoring Program | Department of Education \(nh.gov\)](#).

The risk assessment process emphasizes accountability and transparency for using resources wisely and focuses on the results of LEA implementation of applicable laws and regulations. However, variables and their associated weights will fluctuate on a fiscal year basis depending on relevance, available data, and prior year findings. The weight and selection of variables is described further in the ‘Risk Assessment Methodology’ report.

Variables considered in the consolidated programmatic monitoring risk assessment include, but are not limited to:

- LEAs with greater percentages of awarded funds,
- LEAs required to ensure equitable services are delivered,
- LEAs that were monitored in the prior year(s),
- LEAs that had findings in the previous monitoring cycle,
- LEAs that had turnover in key positions the prior year,
- LEAs that have failed to meet Federal reporting requirements,
- LEAs that did not meet Maintenance of Effort (MOE) in at least one category,
- LEAs that are not utilizing funds in a timely manner, and
- LEAs that have experienced issues unique to the administration of Federal programs.

Monitoring Goals

To meet the Federal monitoring requirements, NHED has developed and implemented a consolidated monitoring indicator checklist that is utilized each fiscal year to monitor LEA subrecipients [[2 CFR § 200.329](#)].

Listed below are the major goals included in the consolidated monitoring process:

- To provide oversight and monitoring of Federal grants,
- To ensure compliance with program requirements and uniform guidance,
- To ensure subrecipients are meeting the purpose of the grant,
- To identify and track programmatic compliance,
- To identify technical assistance needs,
- To ensure timely expenditure of grant funding,
- To prevent fraud, waste and abuse, and
- To inform best-practices.

Monitoring Process

NHED's consolidated monitoring process consists of two component variations dependent on the LEA's selection: desktop monitoring or on-site monitoring. A NHED ESEA review team shall collect monitoring documentation during the review process to determine compliance with monitoring indicators. Throughout the review process, NHED staff will continuously communicate with LEA staff if further action needs to be taken to reach compliance. As a method of correcting programmatic findings, NHED will issue a monitoring report outlining findings and LEAs will be required to submit a Corrective Action Plan (CAP) to address and implement action steps to rectify those compliance findings.

As the consolidated monitoring plan is implemented, deadlines established below are subject to change with the possibility of becoming stricter each fiscal year.

These documents can be found on the NHED website here: [ESEA Consolidated Monitoring Program | Department of Education \(nh.gov\)](#).

Desktop Monitoring

LEAs that select desktop monitoring will receive the following documents via email:

- Initial Monitoring Selection Notification Letter
- ESEA Federal Consolidated Monitoring Plan Toolkit
- ESEA Checklist for Federal Programmatic Consolidated Monitoring

Desktop monitoring will consist of one monitoring lead to act as the primary person for providing technical assistance concerning the monitoring process. NHED staff from various ESEA programs will participate in the review of records and the issuance of the draft and final reports. On the day(s) of the review, the LEA is expected to be available to assist NHED. Desktop monitoring reviews include an examination of specific programmatic and occasional fiscal evidence. In preparing for the desktop review, the LEA is required to collect, organize, and submit all documentation according to the established timeline and monitoring indicator checklist of all programs indicated in the monitoring notification email. Instructions on how to utilize the State of New Hampshire shared file system and upload documentation appropriately will be shared via email. The LEA is expected to have all documents uploaded to the State shared drive **prior to the day of monitoring** according to the monitoring indicator checklist for all programs identified in the notification email.

On the scheduled monitoring day, the NHED ESEA review team will review all documents for programmatic compliance purposes. NHED will provide the LEA with a summary report of any outstanding items, further clarification needed, or no action required.

If the NHED ESEA team deems necessary, a second day will be allotted for the NHED ESEA review team to finalize their review of all documents for programmatic compliance purposes. NHED will provide the LEA with a summary report of any outstanding items, further clarification needed, or no action required. A second day will only be used on an as-needed basis.

On-Site Monitoring

LEAs that select on-site monitoring will receive the following documents via email:

- Initial Monitoring Selection Notification Letter
- ESEA Federal Consolidated Monitoring Plan Toolkit
- ESEA Checklist for Federal Programmatic Consolidated Monitoring

On-site monitoring will consist of multiple NHED ESEA program personnel visiting the LEA in-person. NHED personnel will consist of various ESEA program specialists and consultants who will review records and participate in the issuance of the draft and final reports. The number of staff assigned to perform the monitoring visit will vary depending on the size of the LEA and Federal programs applicable to the LEA (for example, if the LEA does not receive a Title V grant, a Title V contact will not be part of the review team). In conducting the on-site review, the **LEA is required to collect, organize, and have readily available on the scheduled on-site visit date all programmatic documentation according to the monitoring indicator checklist** for all programs identified in the notification email. If NHED requires additional documents, the LEA shall be readily available to assist in collecting those documents at the time of the visit.

On the scheduled monitoring day, the NHED ESEA review team will review all documents for programmatic compliance purposes. NHED will provide the LEA with a summary report of any outstanding items, further clarification needed, or no action required.

If the NHED ESEA team deems necessary, a second day will be allotted for the NHED ESEA review team to finalize their review of all documents via desktop for programmatic compliance purposes. NHED will provide the LEA with a summary report of any outstanding items, further clarification needed, or no action required. A second day will only be used on an as-needed basis.

Closure of the Monitoring Process

For any outstanding items noted in the summary report, the LEA will have two business days to furnish documents to NHED. If any of the outstanding documents are not provided by the LEA, NHED will proceed with the draft report as-is. NHED will provide the LEA with a draft report within three weeks of the monitoring visit. The LEA will have one week to comment on the draft report. If no comments are received within one week, the final report will be issued. If comments are received, NHED will take them under advisement and reissue the draft within two business days. If no further comments are noted, NHED will issue the final report. Final reports will be sent to the primary LEA Official Contact for the monitoring visit, Business Administrator, Grant Manager (if applicable), and Superintendent.

If applicable, the LEA will have 45 days to provide a Corrective Action Plan (CAP). All CAP items must be corrected within six months, unless otherwise requested by the LEA and approved by NHED.

If an LEA fails to respond to monitoring requests or to furnish documentation, NHED will seek remedies for noncompliance per [2 CFR §200.339](#).

Local Educational Agency Deliverables

Instructions for Document Submission (Desktop Monitoring only)

1. The LEA will gather information and supporting documentation for the applicable areas of the ESEA Consolidated Monitoring Checklist.
2. When saving documents, name each file according to how it is referenced in the ESEA Consolidated Monitoring Checklist (refer to left column, taking into consideration the subsection), for example –
 - PPR 1 a Time and Effort Procedures
 - PPR 1 b Same Time and Effort Records
 - PPR 2 a Record Retention Procedures

Each indicator section will have its own folder for file upload. Subsections will need to be labeled accordingly (reference above) to ensure efficiencies in the review process.

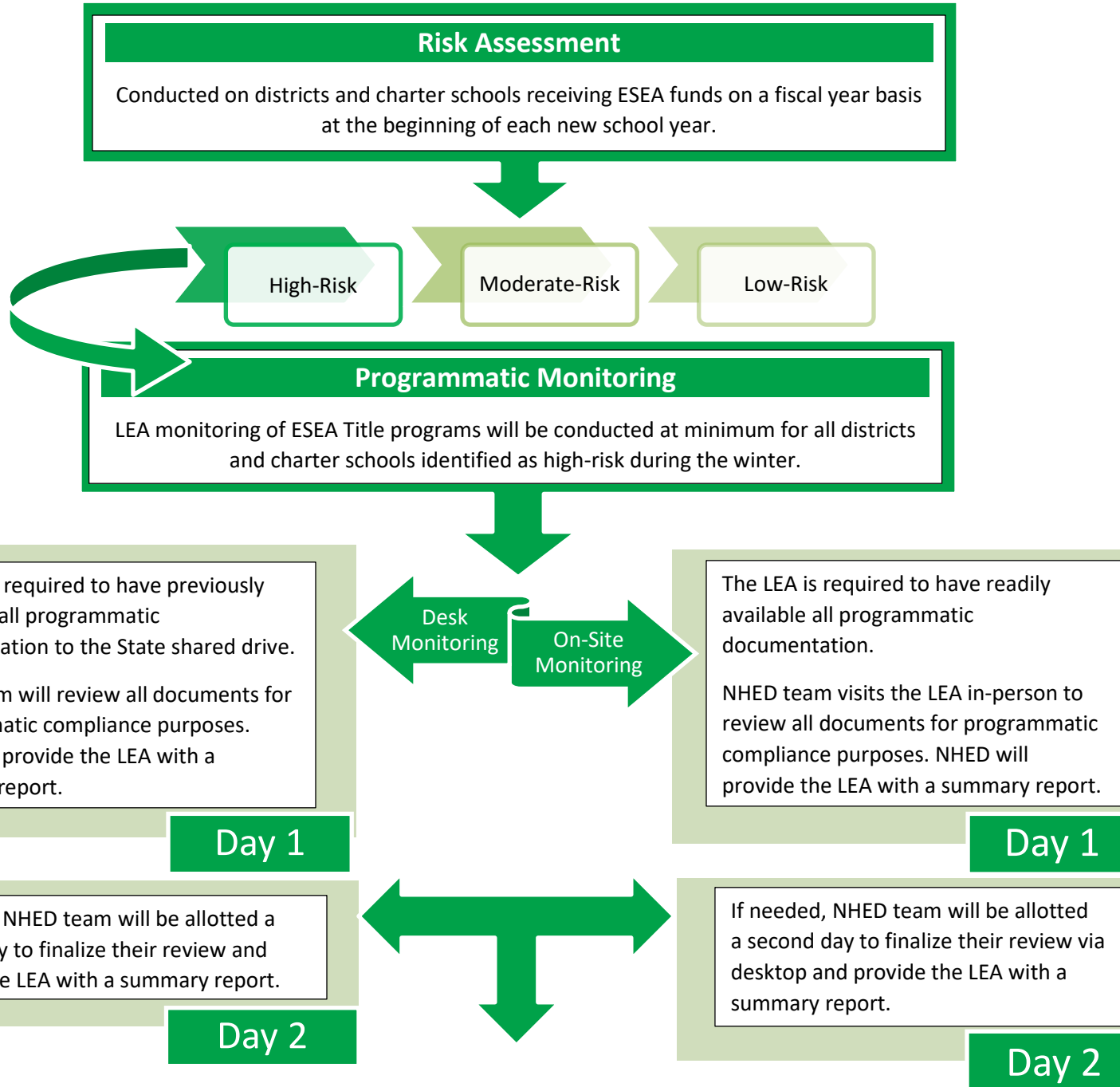
3. Utilizing the State of New Hampshire shared file system (login and upload information sent separately), the LEA will upload all required supporting documents referenced in the checklist. Placing documents in the appropriate folder is of the utmost importance to ensure all documents are reviewed and cross-referenced under the appropriate indicator. If the document is needed under multiple indicators, please ensure it is placed in each folder.
4. If there are indicators for which documentation will not be submitted, the LEA must provide a list of the indicators along with a brief statement explaining why each indicator is not applicable. The list of indicators and the statement must be on the LEA letterhead and signed by the Superintendent. The list must be uploaded in the shared system to the file folder labeled “Indicator Exceptions.”
5. If the NHED ESEA review team finds the documentation provided to be insufficient, a summary report will be provided at the end of the review to indicate which additional documents are required. At that time, the LEA will have two business days to furnish the requested documentation. If no further documentation is provided, the draft report will be generated as-is.

Instructions for Document Collection/Review (On-Site Monitoring only)

1. The LEA will gather information and supporting documentation for the applicable areas of the ESEA Consolidated Monitoring Checklist.
2. When organizing the documents for review, please do so by labeling each document(s) according to how it is referenced in the ESEA Consolidated Monitoring Checklist (refer to the left column, taking into consideration the subsection) ensuring they are separated, for example –
 - PPR 1 a Time and Effort Procedures
 - PPR 1 b Time and Effort Records
 - PPR 2 a Record Retention Procedures
3. If there are indicators for which documentation will not be presented, the LEA must provide a list of the indicators along with a brief statement explaining why each indicator is not applicable. The list of indicators and the statement must be on the LEA letterhead and signed by the Superintendent.
4. If the NHED ESEA review team finds the documentation provided to be insufficient, a summary report will be provided at the end of the review to indicate which additional documents are required. The LEA will have two business days to furnish the additional documentation but will make every effort while NHED is on site to provide the additional documents. If no further documentation is provided, the draft report will be generated as-is.

NHED will not retain documentation, unless necessary.

ESEA Federal Consolidated Monitoring Timeframe Overview



Closure of the Monitoring Process

1. The LEA will have two business days to furnish outstanding documents to NHED.
2. NHED will provide the LEA with a draft report within three weeks of the monitoring visit.
3. The LEA will have one week to comment on the draft report.
4. If comments are received, NHED will take them under advisement and reissue the draft within two business days.
5. NHED will issue a final report.
6. If applicable, the LEA will have 45 days to provide a Corrective Action Plan (CAP). All CAP items must be corrected within six months, unless otherwise requested by the LEA and approved by NHED.



ESEA Programmatic Monitoring Contact List

For general inquiries regarding process, procedure, timeline and/or scheduling, please contact:

Ryanne Dennis, Administrator I
603-731-6314
ESEA@doe.nh.gov

Specific requirement and/or programmatic questions, please refer to the below contact list:

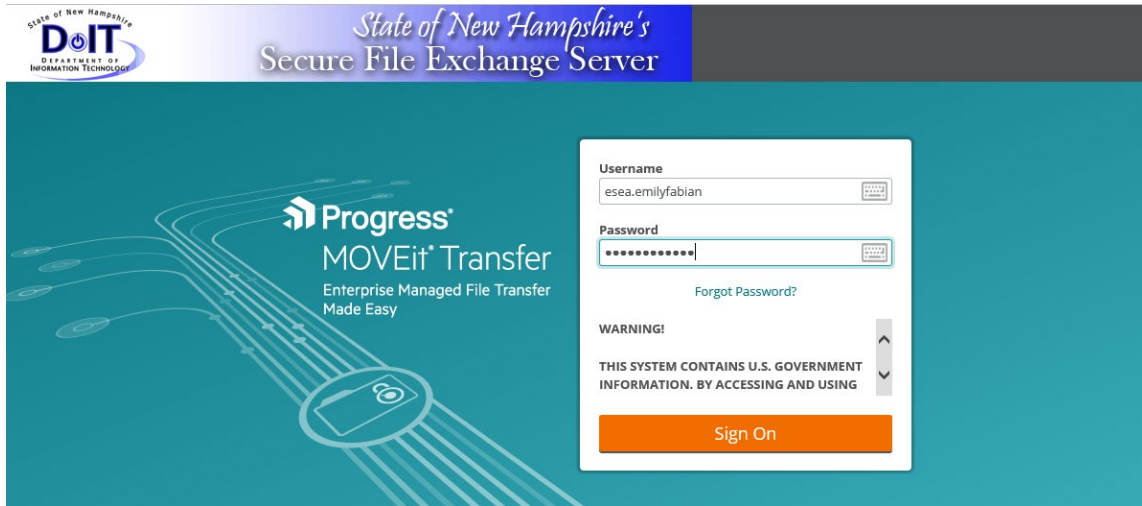
1. Transparent Accountability	Ryanne Dennis
2. Equitable Services (ES) to Non-Public Schools	
3. Transferability	
4. Specific ESEA Title Program Indicators	
Title I, Part A	Christina Dotson 603-271-3840 Christina.L.Dotson@doe.nh.gov
	Melinda Pfaff 603-271-3610 Melinda.M.Pfaff@doe.nh.gov
Title I, Part D	Melinda Pfaff 603-271-3610 Melinda.M.Pfaff@doe.nh.gov
Title II, Part A	Kristine Braman 603-271-6055 Kristine.M.Braman@doe.nh.gov
Title III, Part A	Janna Jobel 603-568-8813 Janna.M.Jobel@doe.nh.gov
Title IV, Part A	Stan Freeda 603-271-5132 Stanley.J.Freeda@doe.nh.gov
Title IV, Part B	Whitney McVeigh 603-520-6263 Whitney.R.McVeigh@doe.nh.gov
Title V, Part B	Jonathan Lacy 603-931-9893 Jonathan.T.Lacy@doe.nh.gov
Title IX, Part A	Christina Dotson 603-271-3840 Christina.L.Dotson@doe.nh.gov

FTP Server Access and Upload Instructions (*Desktop Only*)



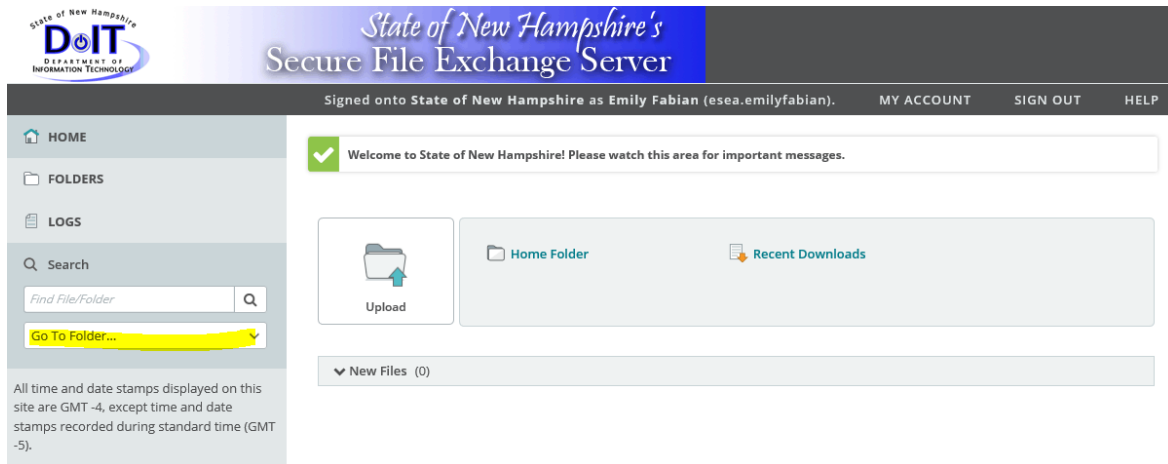
FTP Server Access

1. LEAs that select desktop monitoring will receive a username and temporary password to the State of NH Secure File Exchange Server (FTP Server).
2. Use this link to log in and update your password: [State of New Hampshire \(nh.gov\)](https://www.nh.gov)



Upload Instructions

1. Once logged into the FTP Server, you will need to choose the 'Go To Folder...' and choose your file path 'Distribution/ESEA Consolidated Monitoring/2022-2023/EXAMPLE DISTRICT' –



2. Within your district's file path, you will see all of the required components of the ESEA Monitoring Program's Checklist –



3. Within each component is a subfolder for each indicator applicable to the specific component –



4. Select the indicator you desire to upload supporting documents or resources to; you are given the option within the subfolder to either drag and drop your files or manually upload. Be sure to label files as described within the 'ESEA Federal Programs Consolidated Monitoring Plan' –



5. Repeat #2-#4 until all your indicators have the required supporting documents and resources.