



New Hampshire

**Department of Education**

# Federal Fiscal Monitoring Final Report

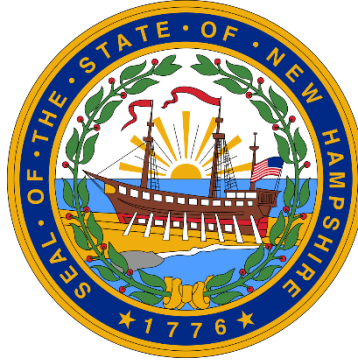
## Unity School District

### School Year 2019-2020

Provided by the NHDOE, Bureau of Federal Compliance

September 29, 2021

**Frank Edelblut**  
Commissioner



**Christine M. Brennan**  
Deputy Commissioner

**STATE OF NEW HAMPSHIRE  
DEPARTMENT OF EDUCATION  
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September 29, 2021

Michael Tempesta, Superintendent SAU 6  
Marjorie Erickson, School Board Chair  
165 Broad Street  
Claremont, NH 03743

Superintendent Tempesta and School Board Chair Erickson:

Thank you for assisting the New Hampshire Department of Education, Bureau of Federal Compliance (NHDOE, BFC) in the Federal funds remote monitoring procedure for Unity School District/SAU 6, conducted on May 10, 2021 by Lindsey Labonville.

The attached report summarizes the information gathered during our visit and identifies our concerns relative to Federal grant fiscal compliance. This report includes one recommendation, but otherwise no instances of noncompliance were identified.

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,

*Lindsey Labonville*  
Lindsey Labonville

cc:  
Caitlin Davis, Director, NHDOE Division of Education Analytics and Resources (via email only)  
Richard Seaman, Finance Operations & Human Resources, SAU 6 (via email only)  
Sharon Mezzack, Accounting & Grant Manager, SAU 6 (via email only)  
Shannon Popescu, School Board Vice-Chair, Unity, SAU 6 (via email only)

Garry Bator, School Board Member, Unity, SAU 6 (via email only)  
John Dempsey, School Board Member, Unity, SAU 6 (via email only)  
Rocco Ruggeri, School Board Member, Unity, SAU 6 (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.**

## District GMS Reimbursement Requests

In addition to reviewing District/SAU policies required by Federal law and rule, two (2) 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	Title I Part A	20200199	Oct-19	80004	\$5,925.85	Salaries and Benefits
2	Title I Part A	20200199	Oct-19	80008	\$134.50	Supplies

During our review, there were no instances of noncompliance documented. However, the NHDOE is making one recommendation:

1. The NHDOE recommends that the Unity School District establish internal controls of review for contracts to ensure it is documented correctly if an employee is Federally funded or not. In the instance of Activity #80004 (Title I October 2019), a contract for Bridget Buchko was supplied for review which indicated she was not federally funded, even though the activity and other supporting documentation stated she was.

**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 two 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**

There were no findings as a result of our monitoring procedure conducted on April 2, 2021.

## **Timeline and Evidence for Findings**

N/A