Compliance 101



FUTURE FORWARD OHIO

OAASFEP Fall 2023

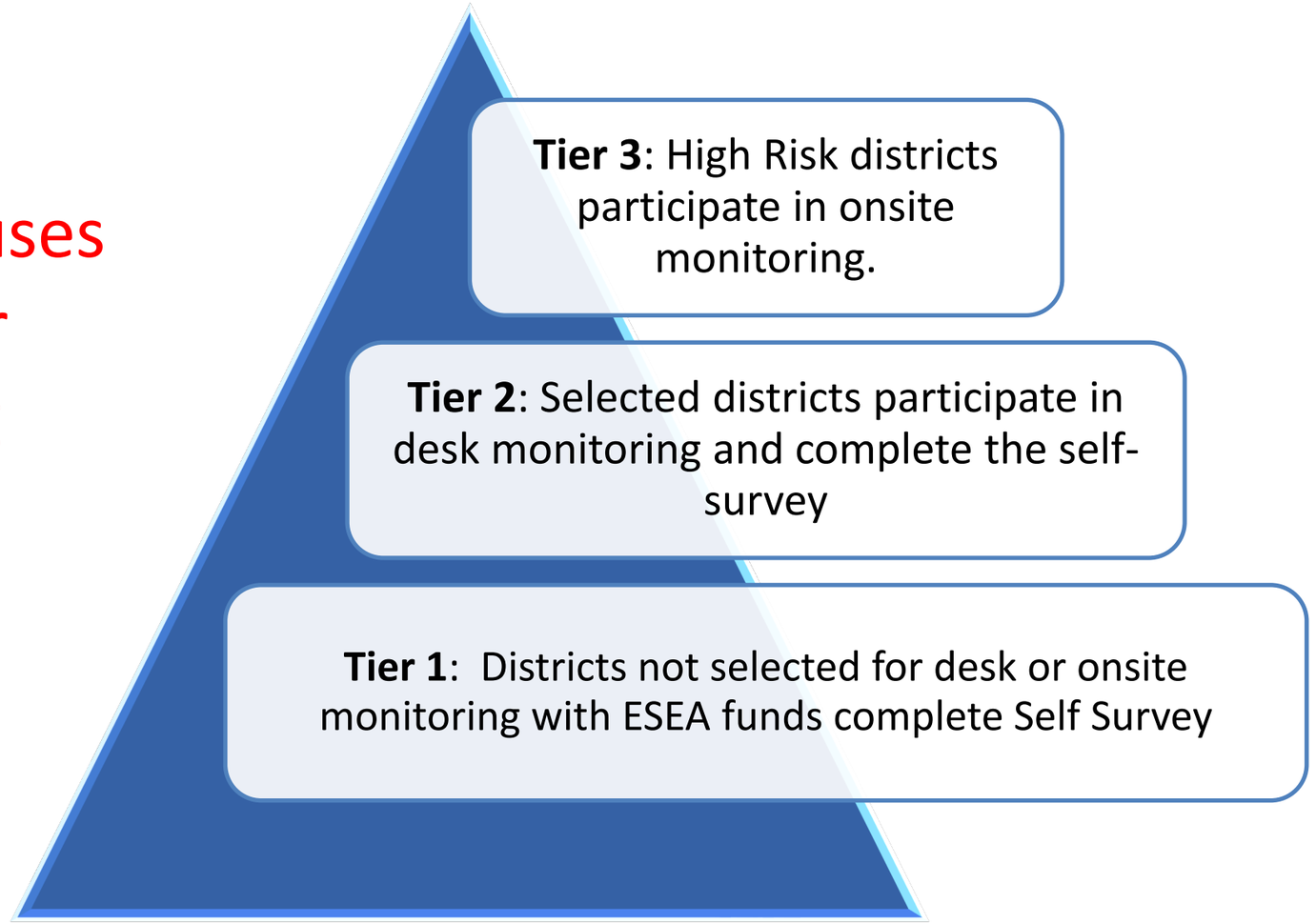
Ohio Department of Education

Todays Agenda

- ✓ Monitoring Levels and Risk Factors
- ✓ Timelines for Monitoring
- ✓ Updates for FY24
- ✓ Preparing for Monitoring

Compliance Background

Federal Programs uses a three-tier monitoring system



Additional Reviews

- Follow-Up Desk Reviews
- Progressive Enforcements
- Formal Complaints – Not included in monitoring process.

What are Follow-Up Desk Reviews?

Follow-Up Desk Reviews:

- Districts that had an issue in previous year's monitoring.
- Only for Desk Review or On-Sites
- To demonstrate that the correction has been carried over into district practice the following year.
- Often Districts cannot provide evidence until the following year.

Progressive Enforcement

- Second Year of Same Issue begins progressive enforcement progress.
- Work with agency to develop processes needed to address “why issue continues”
- Progressive Enforcement Steps Included
- District submits evidence when system opens.
- One month to respond with evidence.

Risk Factors



Comprehensive

Balanced Typology

Annually Completed

The Risk Factors

- Every year, the Department identifies a set of risk factors and scores

- May be subject to change as federal requirements/expectations change

- FY2024: 17 factors

Consolidated ESEA Monitoring Risk Factors

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Office of Federal Programs
Compliance Risk Factors and Scores (FY24)

1. New federal program coordinator at the district level, or the listed Federal Programs Coordinator is also listed as the Superintendent or Treasurer.

10	Less than 1 year or contact information not provided on CCIP Consolidated Application - Contacts page
5	1 to 3 years, or Federal Programs Coordinator is also listed as Superintendent or Treasurer.
0	4 to 5 years
-5	6+ years

1. Noncompliance in ESEA programs for the preceding year and action plan not implemented. (Applied only to the previously monitored districts, based on number of monitoring issues).

15	Above 9
10	4-9
5	1-3
-5	No findings

FY 24 Monitoring Risk Factors

FY 24 Consolidated ESEA Breakdown

- 32 On-Sites
- 60 Desk Reviews with Self Survey
- 46 Follow-Up Desk Reviews with Self Survey
- 805 Self-Survey Only

Timelines



Available in December

Season Runs Jan. - April

Completed by June

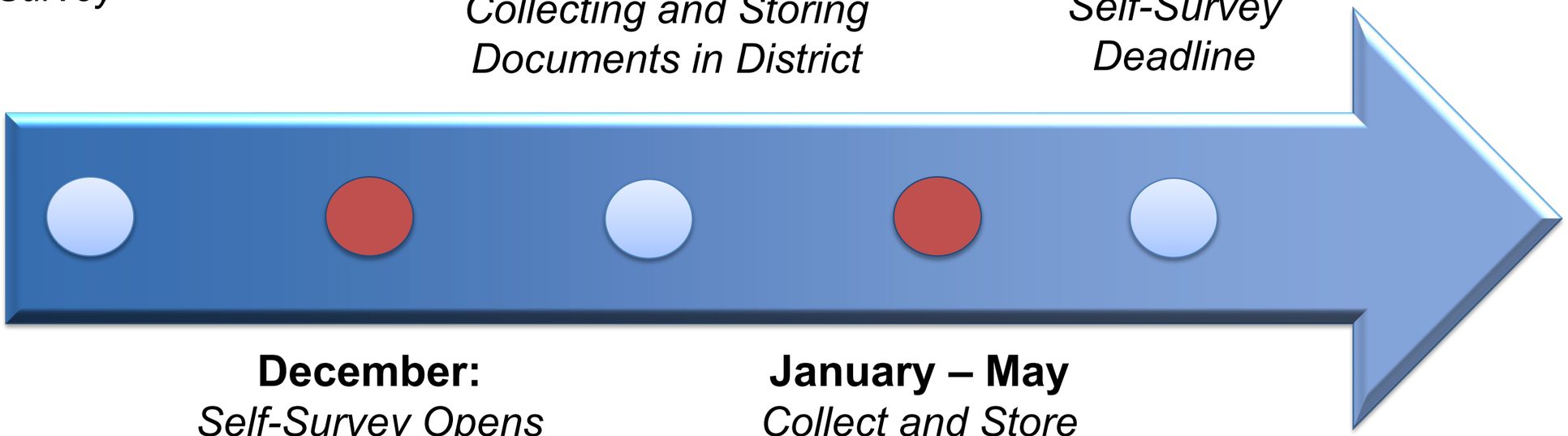
Self-Survey Timeline

District Completes and Checks Items

November
Districts Notified of Monitoring Survey

December - January
Determine System for Collecting and Storing Documents in District

June 30th:
Self-Survey Deadline



December:
Self-Survey Opens

January – May
Collect and Store Documents, Check Off Items in System

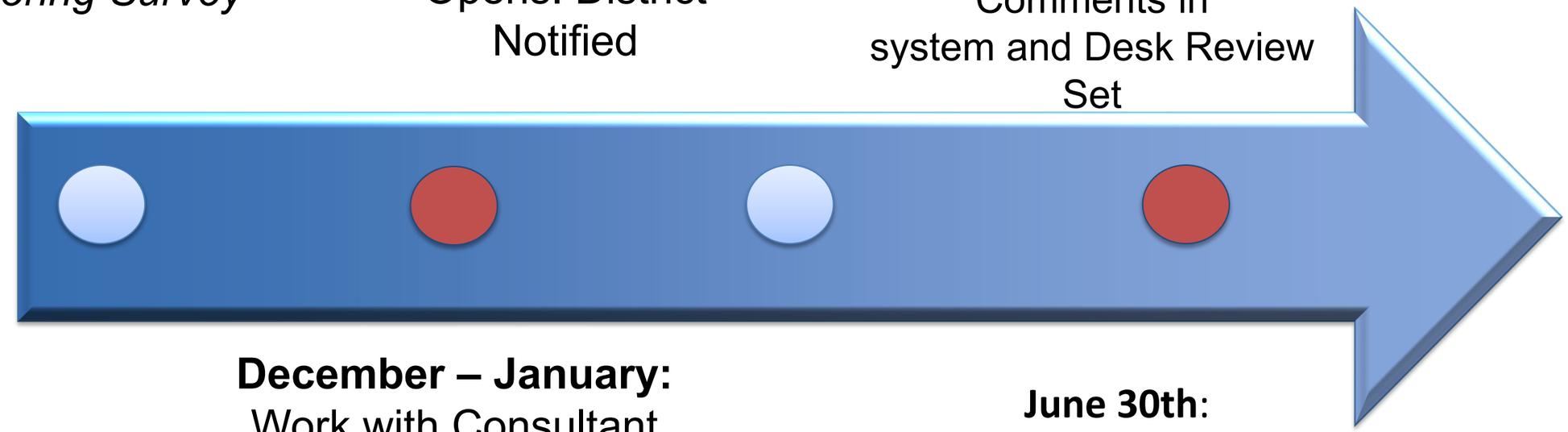
Desk Review Timeline

Consultant Directed

November:
Districts Notified of Monitoring Survey

December:
Compliance System Opens. District Notified

December - March:
Date for Upload of Documents and Comments in system and Desk Review Set



December – January:
Work with Consultant to Complete Desk Review

June 30th:
Self-Surveys due.

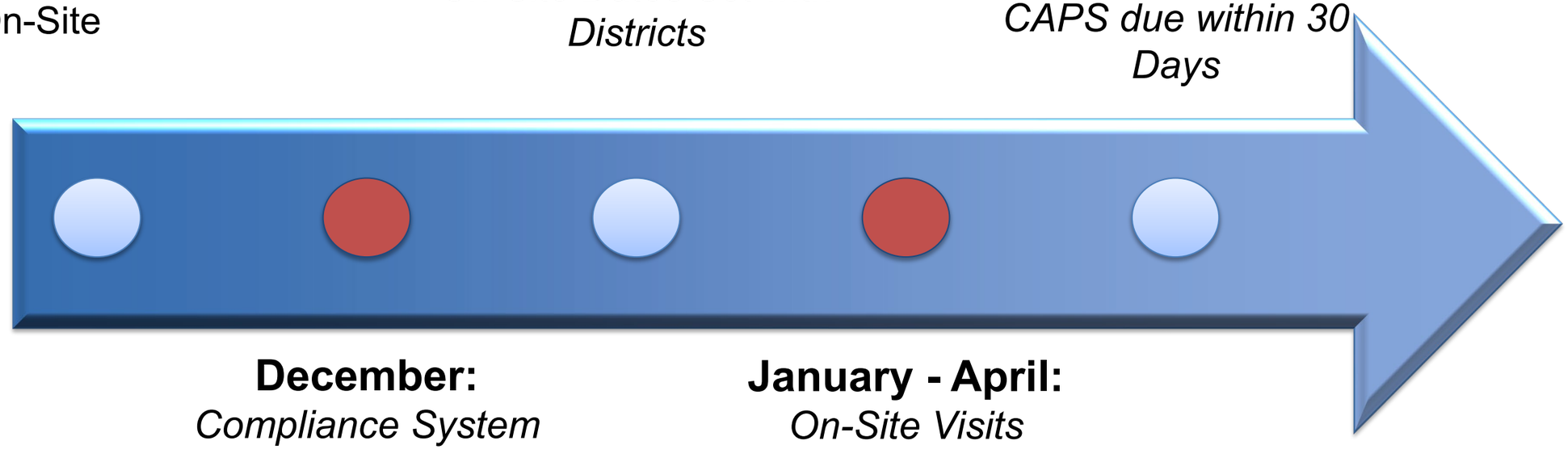
On-Site Timeline

Consultant Directed

November:
District Notified of On-Site

December- January:
On-Site Dates Set with Districts

January - May
Consultants Review Monitoring Outcome – CAPS due within 30 Days



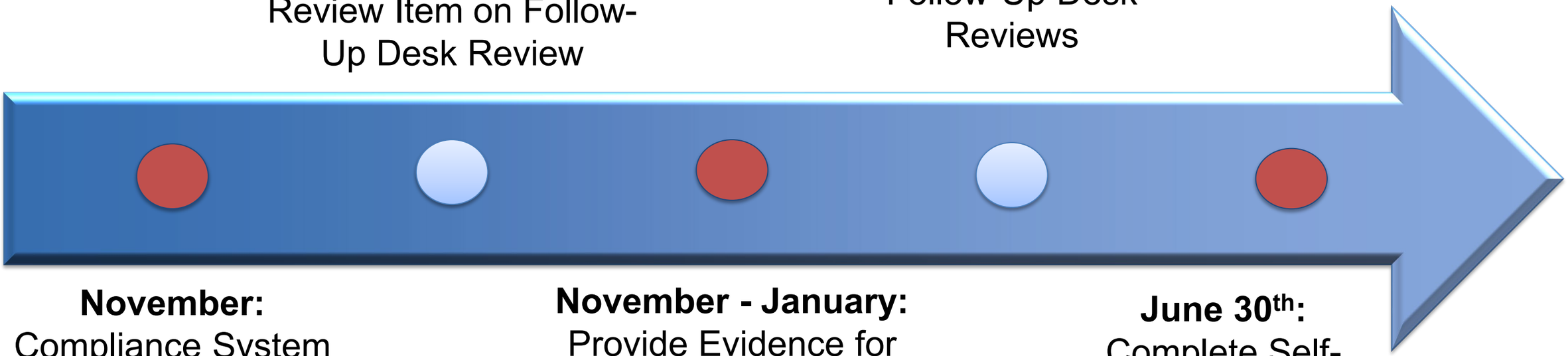
December:
Compliance System Opens, Districts Notified of Cross-Office Monitoring

January - April:
On-Site Visits Conducted

Proposed Follow-Up Desk Review Timeline

November – Beg. Of December:
Work with Consultant to Review Item on Follow-Up Desk Review

January 30th:
Consultant Completes Follow-Up Desk Reviews



November:
Compliance System Opens for Follow-Up Desk Reviews.

November - January:
Provide Evidence for Follow-Up Desk Review by Beginning of January

June 30th:
Complete Self-Survey

Preparing for Desk and On-Site



System Approach

Team Effort

Timeliness

Purpose of Monitoring



OPPORTUNITIES FOR SUPPORT



IDENTIFY AREAS FOR GROWTH



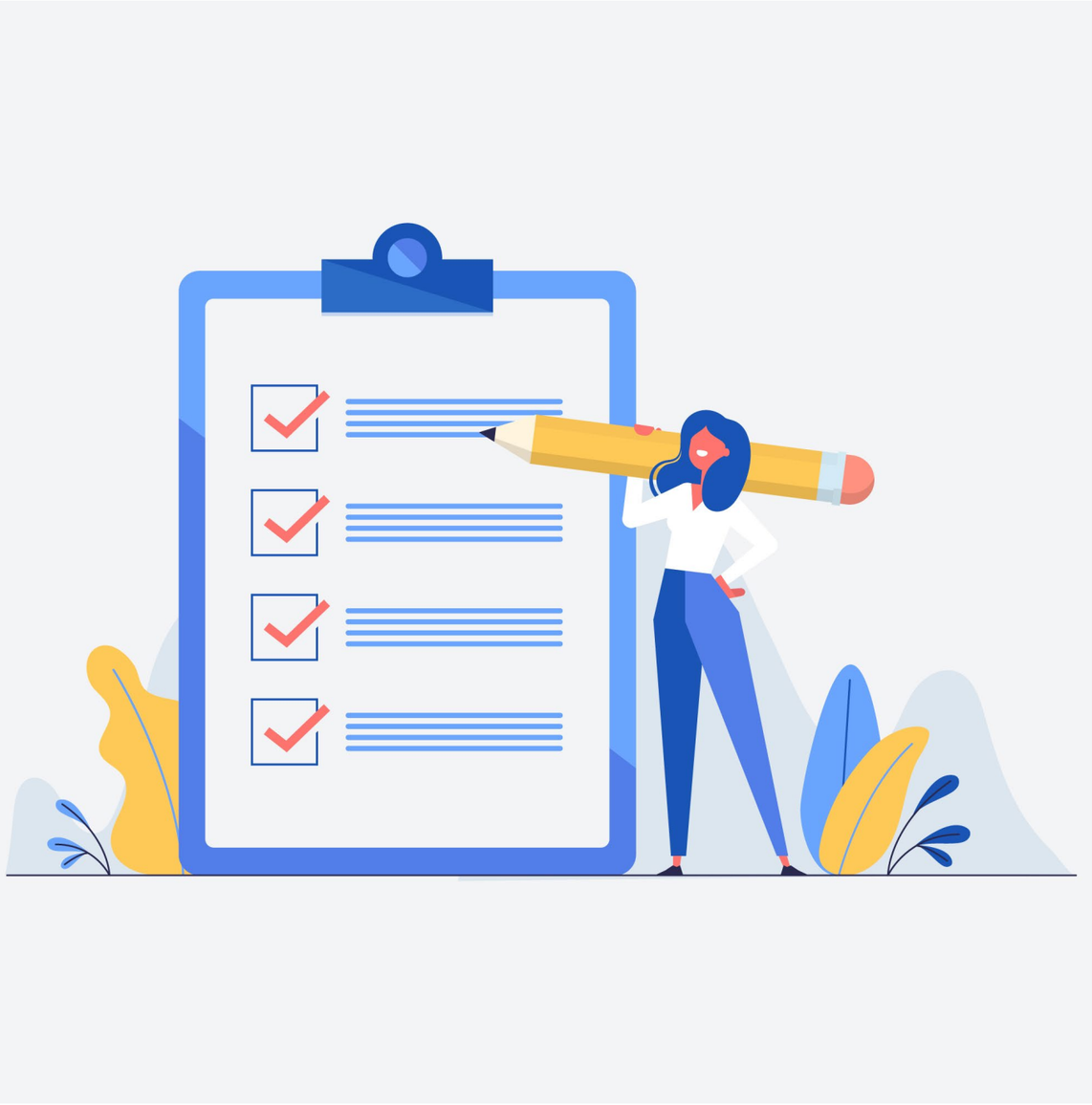
CLARIFIES REQUIREMENTS OF PROGRAMS



PROVIDE CONSISTENCY

Completing a Self-Survey

- A self-survey is completed by the district only. There is no upload of documents or comments added. It is self-monitoring of the district's practices and processes with ESEA programs.
  - Review Questions and Required Evidence for Each Item in Survey
  - Meet with Team to Determine Responsibilities for Collecting Evidence
  - Determine Method of Evidence Collection and Storing of Evidence
  - In Monitoring System, check off items in each section as completed
  - Needs to be Completed by June 30th –



Preparing for a Desk or On-Site

1. Determine Who Needs to be Involved in the On-Site
2. Distribute Questions and Required Evidence List
3. Create a timeline for preparation

Get Organized

Create a system for gathering evidence annually.



–Print Out a PDF of the Questions and Required Evidence



–Will they be electronic or hard copy files



–Organize around funds and requirements

Get Organized



–Utilize forms that can be updated annually



–Maintain records for minimum of 7 years



–Applies to self-survey, desk, and on-site reviews.

What to Expect for Desk Review

- Consultant will schedule a time to have comments and documents completed for review.
- Virtual meeting set to review responses and documents uploaded
- Consultant will review documents and comments after virtual meeting
- Consultant will meet with district to review any issues or technical assistance items identified
- District submits an action plan within 30 days if any issues are identified.

What is an On-Site Review

- A team comes to the school.
- Documents need to be provided prior to visit
- Team meets with principal, treasurer, Title I staff, parents
- Tour of the building
- Review of personnel files
- Voucher packets pulled for expenditures
- Looking for physical evidence of programming



Preparing for an On-Site

- Provide Documents prior to visit
- Federally Funded Spreadsheet – Complete and Submit
- Evidence-Based Strategies – Complete and Submit
- Payroll Records – ACCRPT Fiscal Document and Fiscal Ledger – Detailed Budled Fiscal Document - Upload
- Building Budgets – Detailed Budsum Fiscal Document - Upload

Preparing for an On-Site

- Prepare Staff Involved with On-Site
- Building Principals – Building Worksheet
- Non-Publics – Non Public Worksheet
  Federal Staff
- Federal Staff
- Homeless Liaison and Parent Liaison

Monitor System



Navigation

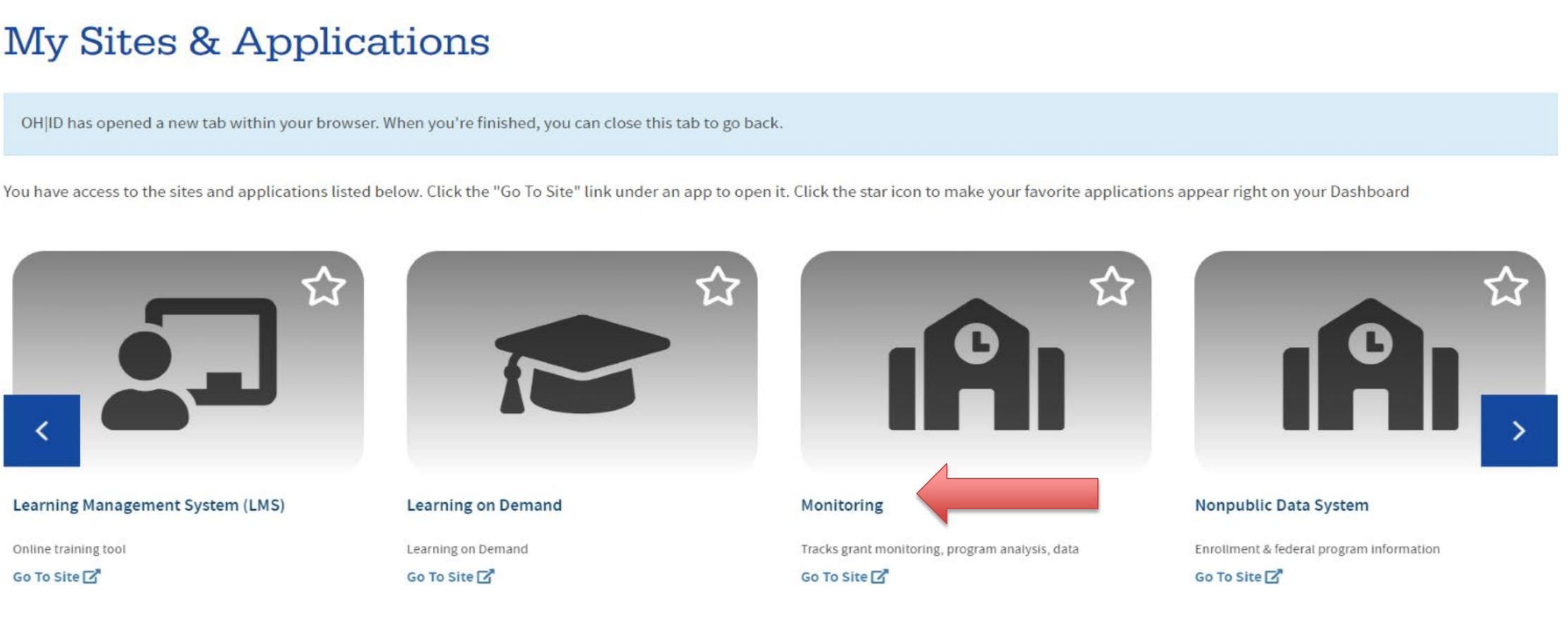
Questions

Issues and Technical Assistance

OEDS Role

- CCIP Authorized Representative
- CCIP Fiscal Representative
- Superintendent
- Treasurer
- Data Entry Planning – CCIP
- Data Entry Funding - CCIP

Access Through OH/ID



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Monitoring Dashboard

Select A Program

050765 - Ohio Department of Education

You are associated to multiple audiences in the organization. Please select an audience and click the program link below.

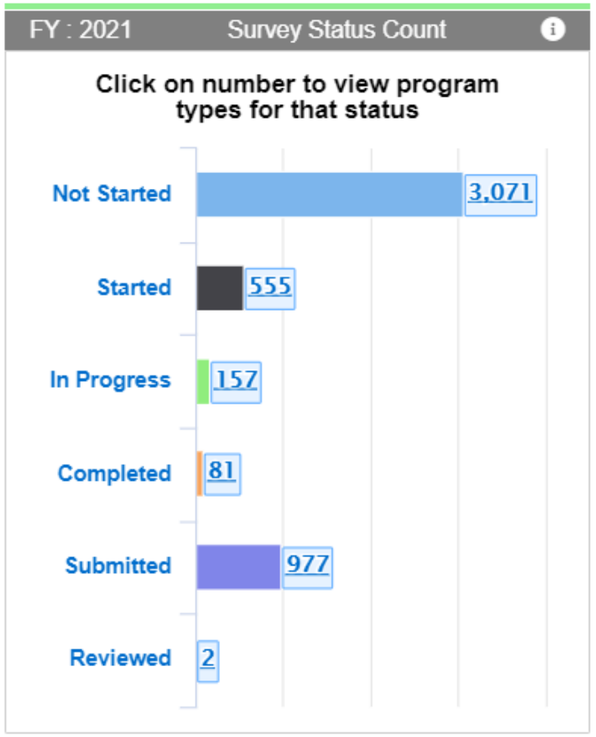
View As

Admin

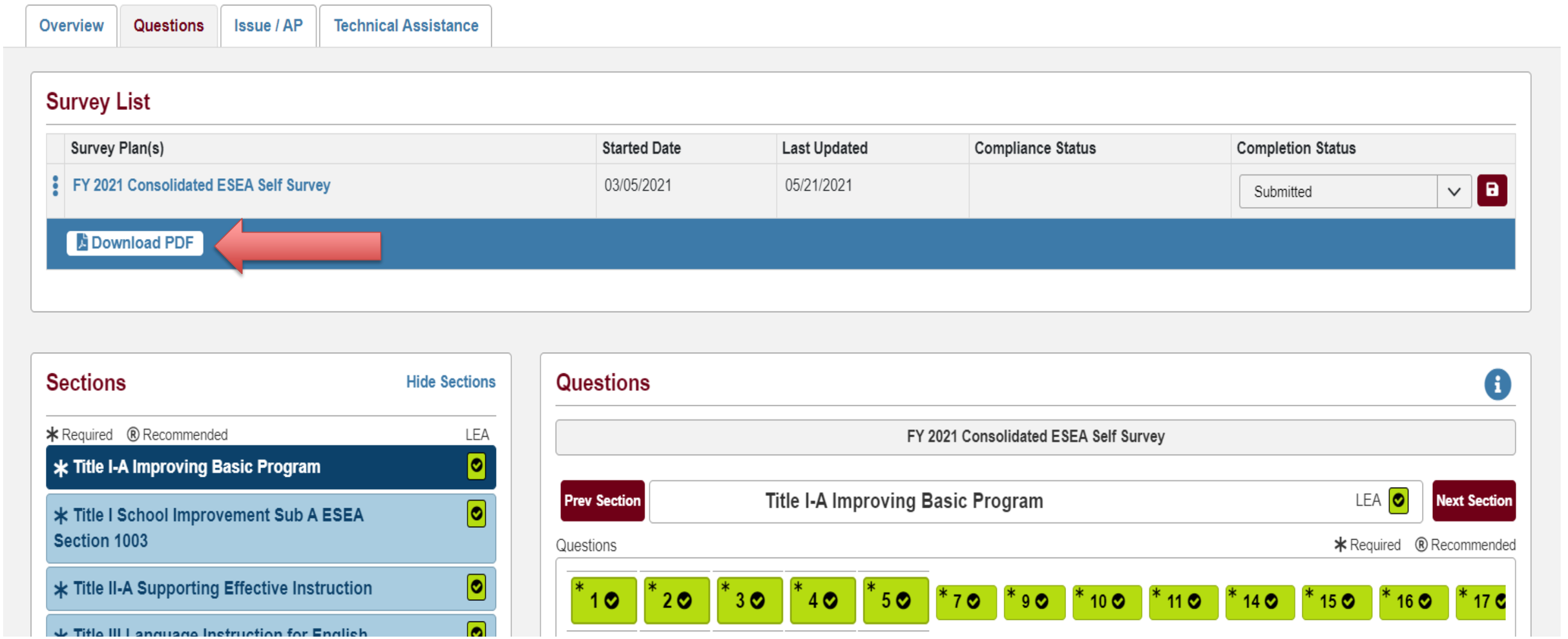
Program Associated To

Consolidated ESEA Grants

Support Schools



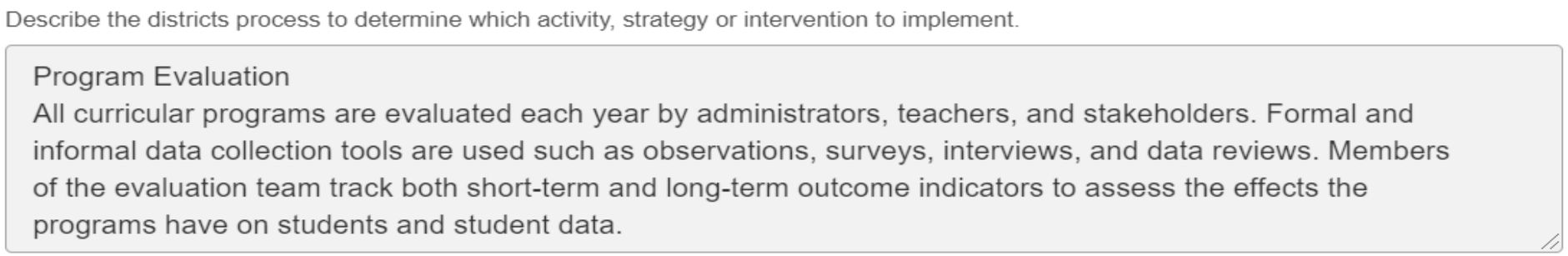
Questions Tab



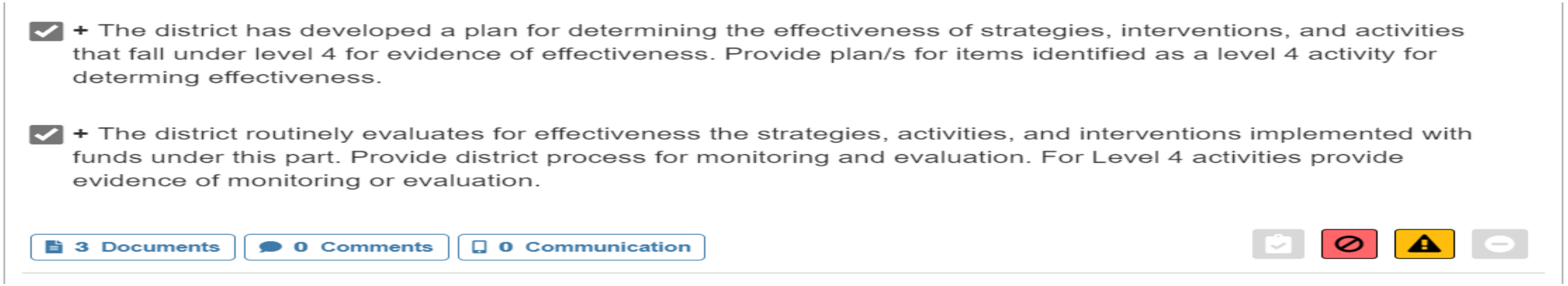
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Responding to Questions

- Describe or Explain: Add response to textbox provided



- Provide or upload: Upload documents to the question



Responding to Questions

- Self-Survey: No documents or questions are responded to in the system. District maintains records

- Desk or On-Site Review: All questions need to either have a comment or document upload. N/A if item does not apply, but rare.

- System triggers questions based on district information.

Technical Assistance vs Issue

Description	Technical Assistance	Issue
Determination	Minor concern. District usually has evidence, but missing an item in evidence	Concern that requires an action. No evidence, not an allowable activity, missing major elements in evidence
Support	Consultation is provided	Consultation is Provided
District Action	Discuss changes that need to be made with consultant and how best to achieve. Documented in system with technical assistance note.	Consultant makes recommendations in system. District must provide a corrective action plan in the system within 30 days.
New Evidence Required	No further actions needed	Must upload evidence demonstrating compliance end date
Next Year's Survey Consequence	No effect on next year's survey list	Automatically has a follow-up desk review on item identified.

Hot Issues

- The Winner Is!
  - –Non-Public Equitable Services
    - Consultation
    - Spending the Funds
    - Service Delivery
- Licensure/Qualifications of Federally Funded Staff
- Parent Engagement Activities
- Title III – EL Evaluation



What to Tell Districts?

- Do your Self-Survey
- Spend your Money
- Provide your Nonpublic Equitable Services

- A district may ask what they “did wrong” to get monitored
  - Nothing, monitoring is a part of the process
  - Not punitive, here to help

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