Overview of DPI's Education Stabilization Funds (ESF) Monitoring Protocols

Erick Blasing, School Administration Consultant

Josie Smith, School Administration Consultant

WI Federal Funding Conference

February 2023

WISCONSIN DEPARTMENT OF
Public Instruction
Jill K. Underly, PhD, State Superintendent

Funding Overview

CARES Act
ESSER I, GEER
3/13/2020 - 9/30/2022

CRRSA Act
ESSER II
3/13/2020 - 9/30/2023

ARP Act
ESSER III
3/13/2020 - 9/30/2024

Crisis Response

Resume/ Sustain In-person Instruction

Recovery - Address Learning Loss

Funds must be used to prepare for, respond to, or prevent COVID-19

Performance Period of ESF Grants

Grant	Available through	WISEgrants Fiscal Year
ESSER I	September 2022	2020-2021
GEER	September 2022	2020-2021
ESSER II	September 2023	2021-2022
ESSER III	September 2024	2021-2022

WISEgrants
Wisconsin Information System for Education

Monitoring Basics

- **It is required by federal law**

- **LEAs are selected based on a risk assessment**

- **It is NOT a punishment nor does it mean the LEA did anything wrong**

- **Monitoring is a chance for DPI to provide support to LEAs as they implement programs using ESF funding**

- **It is also an opportunity to see the great things that LEAs are doing with their ESF funding**

ESF Monitoring Process

The DPI has oversight and monitoring responsibilities to review compliance of ESF grant programs. DPI takes a three pronged approach to monitoring.

1. **Universal monitoring** - helping all LEAs understand the basic rules and ensuring technical requirements are met.

2. **Targeted monitoring -** providing additional support to a targeted group of LEAs based on risk assessment factors.

3. **Comprehensive monitoring -** collaborating with or coaching selected LEAs to ensure full implementation of requirements.

Universal Monitoring

Universal monitoring is in place for all LEAs receiving ESF funds

Examples of Universal Monitoring:

- Applications, Budgets, and Claims
- Ensuring Equitable Access Affirmation for GEPA Compliance
- Requirements Specific to ESSER III including:
    - Stakeholder Engagement
    - Safe Return to Schools Plan
    - LEA Plan
- ESF Reporting
- WISEgrants

Targeted Monitoring

For ESF, targeted monitoring only includes a desk review.

DPI conducts targeted monitoring in two ways:

1. Fiscal Monitoring
2. Single Audits

Targeted Monitoring

Fiscal Monitoring

- DPI performs a fiscal risk assessment annually to determine an LEA's level of financial risk based on several factors.

- Subrecipients are rated as low, medium, or high risk.

- Subrecipients with a medium or high risk assessment will receive terms and conditions for the upcoming fiscal year's federal grant programs.

Targeted Monitoring

Single Audit

- Subrecipients must complete single audit reports for federal grant programs

- Determine subrecipients' compliance with financial and programmatic requirements for federal funding

- Identify areas in which additional support and guidance is warranted related to the subrecipient's fiscal management procedures

- All findings are reviewed by DPI

Comprehensive Monitoring

Comprehensive Monitoring includes a greater level of support to a small group of LEAs

- DPI staff conduct a desk review and on-site visit with these selected LEAs to provide more intensive guidance and support

Comprehensive Monitoring Selection

LEAs are selected for Comprehensive Monitoring using a risk assessment

Risk assessment factors include:

- student assessment and graduation data
- inequitable distribution of teachers
- combined allocations for all stimulus grants
- history of past single audit findings
- history of late application and report submissions

Comprehensive Monitoring Rubric

There is a rubric for each requirement that DPI staff will use to determine an LEA's level of compliance with the law.

- Beginning
- Developing
- Accomplished
- Exemplar

Comprehensive Monitoring Required Documentation

LEAs demonstrate compliance by uploading artifacts as requested during the monitoring process

- LEAs must observe all requirements of the Family Educational Rights and Privacy Act (FERPA) when submitting documents to DPI

- LEAs will have sufficient time to submit the documentation and DPI staff will review the documents prior to the visit

Comprehensive Monitoring Guiding Questions

The purpose of the monitoring visit is to gather additional information related to each of the requirements

Guiding questions are provided prior to the visit to guide the conversation

- LEAs are not required to provide written responses to the guiding questions

- It is important that LEA staff who implement the ESSER programs participate in gathering and uploading the required documentation as well as participate in the visit

Comprehensive Monitoring Report/Results

Preliminary findings will be presented to the LEA at the end of the visit

A formal written report will be sent to the LEA six weeks after the visit

- The formal report will identify strengths, weaknesses, any necessary corrective action, and will provide technical assistance if needed.

- If corrective action is necessary, DPI will send the LEA a final closure letter when all corrective actions are complete.

Requirement 1.1: Stakeholder Engagement

- **An LEA receiving ESSER Funds must engage in meaningful conversations with stakeholders**

- **Required documentation includes evidence support the level of engagement identified in the "Stakeholder Engagement for Plan Development" Section of the LEA's ESSER III LEA Plan Report**

Requirement 1.1: Stakeholder Engagement

DPI is looking for:

- **LEA engagement with diverse stakeholders, including those representing historically marginalized and/or currently marginalized students in all parts of the planning process**

- **Example: Stakeholders participated in identifying needs created by the pandemic, developing a plan to meet those needs, and will be involved in the implementation of the plan as well as assessing the outcomes of the plan**

Comprehensive Monitoring
Section 2: Plan

Requirement 2.1: Needs Assessment

- There is no documentation required to upload for this requirement

- DPI understands that a completing a formal needs assessment may have been challenging during the pandemic and is looking to understand how the LEA made decisions

- LEAs will not receive corrective action for this requirement but DPI may provide recommendations for conducting needs assessments in the future

Comprehensive Monitoring
Section 2: Plan

Requirement 2.1: Needs Assessment

DPI is looking for:

- **LEA engagement in a needs assessment through analysis of multiple years of student outcome data**

- **LEA engagement in root cause analysis to identify adult practices that need to change to improve student outcomes**

- **LEA focus on assets and successes in addition to gaps and deficits**

- **LEA summary of needs assessment available and accessible to stakeholders**

Comprehensive Monitoring
Section 2: Plan

Requirement 2.2: Evidence-Based Improvement Strategies

- **The LEA Plan in WISEgrants identifies the EBIS selected, so no additional documentation is required to upload for this requirement**

- **DPI is looking for EBIS that is aligned to the needs assessment and the steps the LEA took to implement the EBIS**

Comprehensive Monitoring Section 2: Plan

Requirement 2.2: Evidence-Based Improvement Strategies

DPI is looking for the following:

- **Action steps supporting implementation of instructional and leadership practices aligned to the EBIS**

- **Ongoing professional learning is reflected during the implementation of the EBIS**

- **LEA has a system for monitoring the implementation of the plan throughout the implementation of the EBIS**

Requirement 3.1 Outcomes

LEA will ensure that the interventions it implements with ESSER funds will respond to the academic, social, emotional, and mental health needs of all students, and particularly those students disproportionately impacted by the COVID-19 pandemic, including:

- students from low-income families
- students of color
- English learners
- children with disabilities
- students experiencing homelessness
- children in foster care
- and migratory students

Comprehensive Monitoring
Section 3: Outcomes

3.1.a. Required Documentation - Educator Practices

- Evidence of supporting the Educator Practices data identified by the LEA in item d of the "Plan for ESSER III" section of the [LEA's ESSER III LEA Plan Report](#).

3.1.b. Required Documentation - Student Outcomes

- Evidence of Student Outcome data identified by the LEA in item "d" of the "Plan for ESSER III" section of the LEA's ESSER III LEA Plan Report.

LEAs must ensure documents do not include any personally identifiable information (PII).

Comprehensive Monitoring
Section 3: Outcomes

Requirement 3.1 Outcomes

DPI is looking for:

- **Evidence that the LEA uses Plan Do Study Act (PDSA) cycles to review educator practices monitoring evidence used to document implementation**

- **LEA use of educator practice data to identify any unintended consequences to equity**

- **Evidence that LEA revises plans and next steps or prepares for scale-up in response to PDSA cycles**

Requirement 4.1: Time and Effort

- **Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed**

- **Required documentation includes written procedures and time and effort supporting documentation**

Requirement 4.2: Property Management

- **Procedures for managing equipment are required until disposition takes place**

- **Required documentation includes policy, property records, reconciliation, and written procedures**

Report of Findings

- **Preliminary findings will be presented to LEA at the conclusion of the visit.**

- **Formal written report will be sent to LEA approximately six weeks after the visit. Report will include:**

  - Strengths
  - Weaknesses
  - Any necessary corrective action
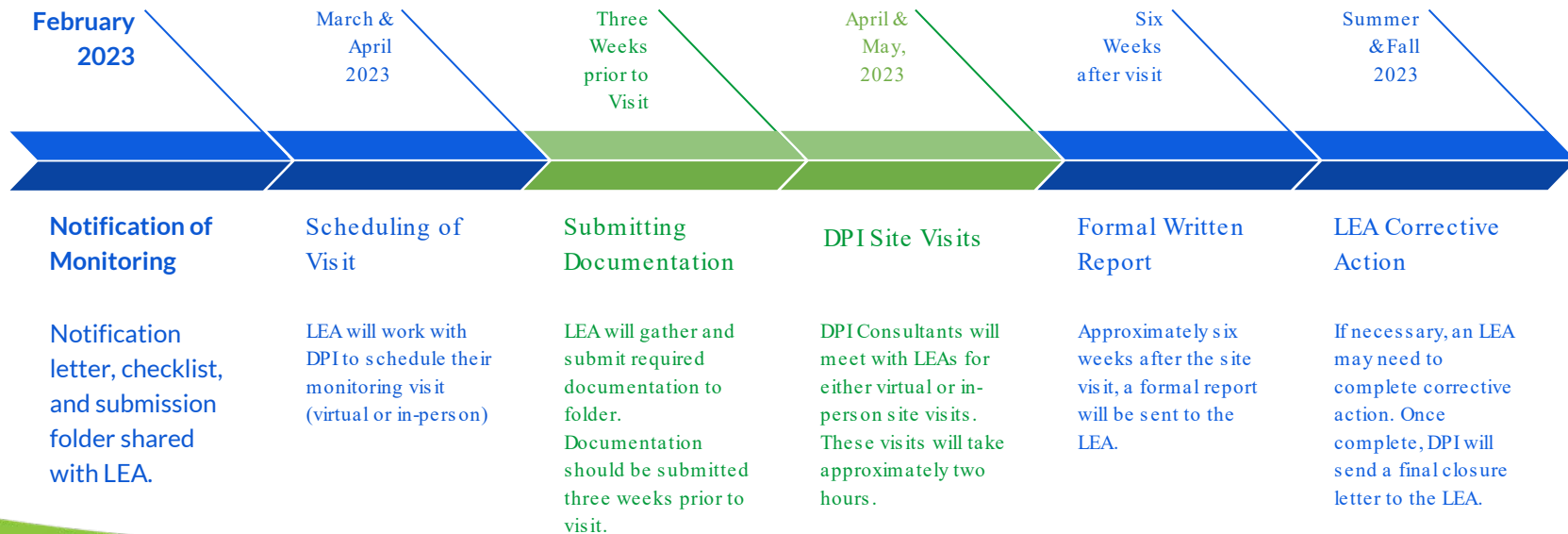 - Technical assistance if needed

Report of Findings

Corrective Action

- **If necessary, LEA will see identified corrective action if the formal report**

- **After corrective actions are addressed by LEA**

  - **DPI will review actions**

  - **DPI will send a final closure letter to LEA, once actions are complete**

Comprehensive Monitoring Timeline

February 2023

March & April 2023

Three Weeks prior to Visit

April & May, 2023

Six Weeks after visit

Summer & Fall 2023

Notification of Monitoring

Scheduling of Visit

Submitting Documentation

DPI Site Visits

Formal Written Report

LEA Corrective Action

Notification letter, checklist, and submission folder shared with LEA.

LEA will work with DPI to schedule their monitoring visit (virtual or in-person)

LEA will gather and submit required documentation to folder. Documentation should be submitted three weeks prior to visit.

DPI Consultants will meet with LEAs for either virtual or in-person site visits. These visits will take approximately two hours.

Approximately six weeks after the site visit, a formal report will be sent to the LEA.

If necessary, an LEA may need to complete corrective action. Once complete, DPI will send a final closure letter to the LEA.

Key Points

- All LEAs engage in some level of ESF Monitoring

- Being selected for comprehensive or targeted monitoring does not mean that the LEA has done anything wrong

- DPI encourages LEAs to view intensive monitoring as an opportunity to seek support and guidance as appropriate

Resources

- **CARES Act ESSER I**

- **CARES Act GEER**

- **CRRSAA ESSER II**

- **ARPA ESSER III**

- **Guidance on Allowable Costs**

- **Construction Technical Assistance Slides** | **Video** | **How to Budget**

- **WISEgrants podcast**

- **EBIS/ESSER III Helpline**

- **ESSER III Reading Initiatives**

- **EBIS Resources**

- **Out-of-School Time Grant Opportunity**

- **Summer School Grant Opportunity**

- **ESF Monitoring Guide**

- Submit questions to: **essergrants@dpi.wi.gov**

Questions

Please email essergrants@dpi.wi.gov for questions moving forward.

Thank you!