

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

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## Funding Overview

### CARES Act

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

Crisis  
Response

### CRRSA Act

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

Resume/  
Sustain  
In-person  
Instruction

### ARP Act

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

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



## Monitoring Basics

- It is required by federal law
- Local Educational Agencies (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 three ways:

1. Fiscal Monitoring
2. Single Audits
3. Davis-Bacon and Related Acts Monitoring



# 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

# Targeted Monitoring

## Davis-Bacon and Related Acts (Davis-Bacon) Targeted Monitoring

- New for FY 2023-24
- LEAs selected for this monitoring if:
  - 75% or more of ESSER III allocation was budgeted on construction or related projects; and/or
  - Over \$1,000,000 of ESSER III allocation budgeted for construction or related project
- Checklist provided to LEAs requested submission of evidence of Davis-Bacon compliance
  - Desk review by DPI

# Davis-Bacon Targeted Monitoring

There are seven requirements, each with required documentation submission:

- 1) Written Procedures
- 2) Bid Documents
- 3) Contractor List
- 4) Wage Determinations
- 5) Contracts
- 6) Davis-Bacon Poster
- 7) Certified Payrolls



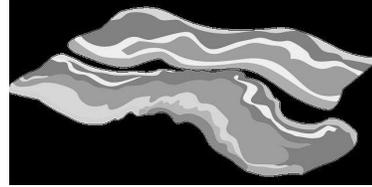
# Davis-Bacon Targeted Monitoring

## Written Procedure Requirement

- Develop and maintain written procurement procedures that ensure contracts using any federal funds to pay for laborers or mechanics (e.g., trades, construction, HVAC, general labor, etc.) that are over \$2,000 comply with Davis-Bacon and Related Acts requirements.
  - Required Documentation: LEA's written procurement procedures, including Davis Bacon Procedures

# Bacon Brain Break

What did bacon say to tomato?



Lettuce get together.



## Davis-Bacon Targeted Monitoring

### Bid Document Requirement

- **Ensure all bid documents reference the contractor and subcontractors requirement to comply with the Davis-Bacon and Related Acts.**
  - For LEAs with more than one ESF funded remodeling or construction project, one sample bid document is sufficient.
  - Required Documentation: One bid document highlighting the Davis-Bacon requirements for contractors and subcontractors

# Davis-Bacon Targeted Monitoring

## Contractor List Requirement

- Ensure no contracts are awarded to ineligible contractors
  - Required Documentation:  
List of all contractors for ESSER III labor projects



# Davis-Bacon Targeted Monitoring

## Wage Determination Requirement

- Identify which prevailing wage rates will be used for all laborers on ESSER III projects
  - Required Documentation: Wage Determination PDF for your county from SAM.gov used to determine the prevailing wage for federally funded project(s). Highlight which classification(s) were used.

# Bacon Brain Break

Got attacked by a bacon tree the other day...

...turned out it was a hambush



## Davis-Bacon Targeted Monitoring

### Contracts Requirement

- **Contracts must include clauses outlining wage determination, Davis-Bacon requirements, and Contract Work Hours and Safety Standards Act requirements**
  - Required Documentation: sample of contracts with specified clauses highlighted
    - sample sizes are outlined in the checklist

# Davis-Bacon Targeted Monitoring

## Davis-Bacon Poster Requirement

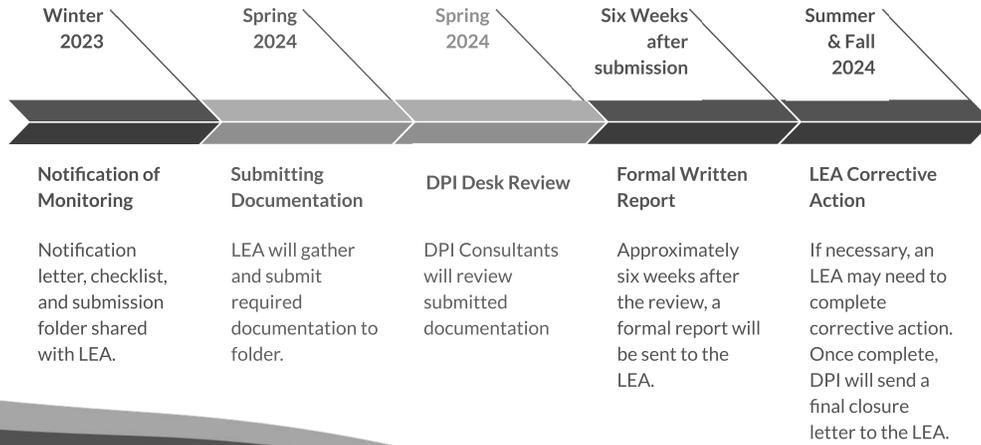
- Ensure the Davis-Bacon poster and wage determination are posted at the work site
  - Required Documentation: Photos of the Davis-Bacon wage determination posted on the job site OR a written attestation from the LEA that the wage determination was posted.
    - sample sizes are outlined in the checklist

# Davis-Bacon Targeted Monitoring

## Certified Payrolls Requirement

- Collect certified payroll reports and statements of Davis-Bacon compliance from the contractor weekly. Review payroll reports and related records for accuracy and compliance.
  - Required Documentation: Samples of certified payrolls that demonstrates all types of laborers and mechanics involved in the project were paid a prevailing wage.
    - sample sizes are outlined in the checklist

# Davis-Bacon Targeted Monitoring Timeline



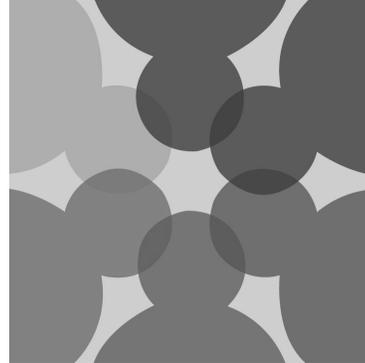
## Bacon Brain Break



# 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.



# Comprehensive Monitoring

## Section 1: Stakeholder Engagement

### 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

# Comprehensive Monitoring

## Section 1: Stakeholder Engagement

### 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 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 (EBIS)

- 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

# Comprehensive Monitoring

## Section 3: Outcomes

### 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
- 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

# Comprehensive Monitoring

## Section 4: Fiscal Requirements

### 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



## Comprehensive Monitoring Section 4: Fiscal Requirements

### 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



## Comprehensive Monitoring Section 4: Fiscal Requirements

### Requirement 4.3: Davis-Bacon & Related Acts (Davis-Bacon)

- Requirements are identical to the requirements of Davis-Bacon Targeted Monitoring
- Only applicable to LEAs who used ESSER II or ESSER III funds for labor projects over \$2,000



# Report of Findings

- **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



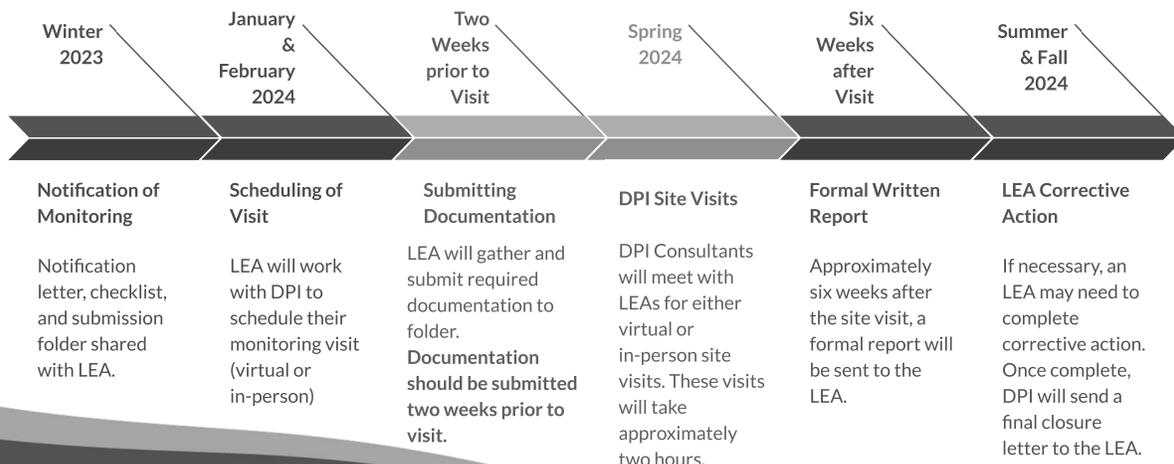
# Report of Findings

## Corrective Action

- **If necessary, LEA will see identified corrective action of 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



## Key Points

- **All LEAs engage in some level of ESF Monitoring**
  - **Upfront or Universal 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](#)
- [Esser Office Hours \(link on DPI Esser III page\)](#)
  - Tuesdays from 9:00-9:50 am
  - Thursdays from 1:00-1:50 pm
- [Submit questions to: essergrants@dpi.wi.gov](#)

# Questions

Please email [essergrants@dpi.wi.gov](mailto:essergrants@dpi.wi.gov) for questions moving forward.

Thank you!

