

Collaborative Federal Programs Tiered Monitoring Process

The tiered monitoring process is implemented to ensure adequate monitoring of all districts with additional opportunities to monitor those districts with high risk characteristics. The tiered process has four components: Desk Audit, Desk-Monitoring, On-Site Monitoring and Telephone Monitoring. Except for the desk audit, all other components are essentially organized around a three-year timeframe. The process requires that all districts and charter schools are placed within one of three permanent cohorts. The cohort structure allows us to equalize the monitoring work across the state and across each of the regions. Charter schools are added to or deleted from a cohort as they come into existence or close.

This process relies on access to a common monitoring tool that is organized to help districts improve the quality of their compliance, better organize their documentation and provide a clear set of documents for other administrators in the district and for successive federal program administrators. This tool also will provide a convenient way for the agency to receive routine documentation without requiring additional letters/e-mails/notifications, etc. Modifications to the Improvement Monitoring Accountability Compliance System (IMACS), a tool developed several years ago by Special Education, will be made to provide the systems capability.

Component 1: **Desk Audit**--Desk audits are accomplished of all districts on an annual basis and include a review of appropriate plans and applications and data reported to DESE. Many of these audits are used to determine federal compliance (for example, Maintenance of Effort, Comparability, Highly Qualified Teacher, Free/Reduced Counts, Supplement not Supplant, etc.). Additional items are added annually as the desk review processes mature.

Component 2: **Desk-Monitoring**—Each district in the selected cohort is expected to complete the self-monitoring report which: organizes the major monitoring items in a way that facilitates understanding and compliance and helps prepares them for the visit. The tool may be organized around the calendar year for some programs to help guide the timely work of the district staff. The tool will allow the Department to identify any district not completing activities/documentation on-time and take immediate action if warranted.

Component 3: **On-site Monitoring**—On-site monitoring validates that districts demonstrate high levels of compliance. Annually 10-15% of the cohort districts will be scheduled for an on-site review. Some districts will be selected based on risk factors but others will be randomly selected to help ensure integrity of the system. Risk factors may include: size of allocations, turnover, IEPs, prior compliance issues, supervisor/director concerns, etc.

Component 4: **Telephone/Document Monitoring**—The bulk of telephone monitoring is conducted based on the cohort model and will use some of the same risk characteristics and/or random selection. Risk characteristics may change from one year to the next based on pressing conditions (for example, ARRA funding). Telephone/document monitoring may include asking for documentation related to an improvement status (improvement plan, parent notifications, etc.), financial management (paid invoices for those on cash basis only), or to other areas consistent with the on-site monitoring check list.

Telephone monitoring could also be flexed as a follow-up to prior year district on-site reviews, or to address some risk districts off-cycle.

Fiscal Crisis: There are infrequent occasions where districts or district personnel are suspected of financial waste, fraud, abuse and/or other issues of similar nature which may put the district in audit danger or financial stress. On those occasions, the department will send in an immediate response team to review the alleged issues and to issue a report of findings and necessary follow-up activities.

Common elements: To reduce duplication of effort, staff will identify those items that are essentially the same regardless of program—the cross-cutting issues. Examples include financial processes, time and effort, inventory, and budgeting. A single review of those cross-cutting items will be conducted and the results applied across the various programs if it is determine the district processes are consistent.

Maturing the process--Over the next several years, DESE will develop a database to compare self-monitoring results with on-site and desk monitoring results. These comparisons will help better identify areas needing further attention for training/technical assistance at the state, regional and local levels. The results will also facilitate identifying districts with potentially greater risk characteristics.

Estimated Implementation Timeline:

Task	2011-12	2012-13	2013-14	2014-15	2015-16
Desk Audit	Cohorts 1,2,3				
Desk Monitoring	Cohort 1	Cohort 2	Cohort 3	Cohort 1	Cohort 2
On-site/telephone		Cohort 1-10%	Cohort 2-10%	Cohort 3-10%	Cohort 1-10%
Clean-up			Cohort 1-10%	Cohort 2-10%	Cohort 3-10%

Note: Programs will begin cohort 1 with paper evaluations if not already in the IMACS