



# DEVELOPING SYSTEMS FOR LEA MONITORING

## BRIEF

The goal of this brief is to help State education agencies (SEAs) prepare local education agencies (LEAs) for the state-level monitoring required as part of the Student Support and Academic Enrichment, Title IV, Part A (Title IV-A) grant. The monitoring process can be stressful for LEAs so it is important that SEAs help LEAs understand that the monitoring process is not a “gotcha,” but, instead, it is an opportunity for LEAs to grow and learn how to improve their processes, which will ultimately improve their programs and student outcomes.

The primary way that SEAs can alleviate the stress of LEA monitoring is to take the fear out of the monitoring process. SEAs can do this in the following ways:

- Being fully transparent;
- Reducing the burden of data collection and documentation; and
- Providing clear guidance, instruction, and tools.

The more information SEAs can provide about the monitoring process, the fewer anxieties LEAs will feel about it; thus, SEAs can foster better engagement and collaboration throughout the monitoring process.

Therefore, the purpose of this brief is to provide SEAs with guidance on how they can better support their LEAs by creating processes for monitoring, including how to organize, structure, implement, and maintain these processes. It is important to note that this brief is not intended to provide formal guidance on the Federal monitoring process. State coordinators (SCs) should consult their assigned Federal Program Officer from the U.S. Department of Education (ED) with any questions about the Federal requirements. Rather, the intent of this brief is to provide an example of what SEA monitoring of LEAs could look like in practice.

## Overview of the Monitoring Process

This section provides an overview of various aspects of the monitoring process that are critical for SEAs to understand in order to best support LEAs’ processes for organizing, preparing for, and implementing monitoring. Although this brief explains the ways SEAs can support LEAs on monitoring, it is important to understand the broader context. SEAs are also subject to monitoring by the Federal government, and this is commonly referred to as Federal monitoring. Therefore, this overview includes topics related to the Federal requirements, risk assessment, monitoring timelines, and types of monitoring.



### Federal Monitoring Requirements

To better understand the monitoring process, it is important to provide context and understanding of the Federal monitoring requirements for SEAs. According to the ED, Office of Safe and Supportive Schools (OSSS), Title IV-A Fiscal Year 2022 Monitoring Plan, “monitoring is the regular and systematic examination of a State’s administration and implementation of a Federal education grant, contract, or cooperative agreement” (p. 5). Section 4104(b)(1) of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act, states that SEAs shall provide “monitoring of, and training, technical assistance, and capacity building” to LEAs receiving a Title IV-A funding allotment (p. 5).

Though there are notable differences in the Federal monitoring for SEAs versus how SEAs monitor LEAs, SEAs can extend this definition to LEA monitoring because it is favorable to align with the Federal requirements. Because SEAs are accountable to ED for the proper administration of Federal funds from programs such as




Title IV-A, LEAs receiving these funds must also properly administer the Federal funds. To that end, SEAs are responsible for helping LEAs correct any issues identified through the monitoring process.

Federal monitoring for SEAs consists of three categories and eight indicators, identified in Table 1. It is important for SEAs to consider these indicators when developing monitoring expectations for LEAs as the requirements will likely be similar, although the SEA may wish to customize the LEAs’ indicators to best address state and local needs.

### Entity Risk Assessment

In addition to the Title IV-A statute, other regulations, such as the Code of Federal Regulations, Uniform Guidance, impact what states should do when administering Federal awards. To read the regulations in full, please see ED’s [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#). Essentially, SEAs are responsible for monitoring LEAs that receive a Title IV-A award, and the SEA’s monitoring plans should be informed by an evaluation of

**Table 1: Categories and Indicators of Federal Monitoring for SEAs**

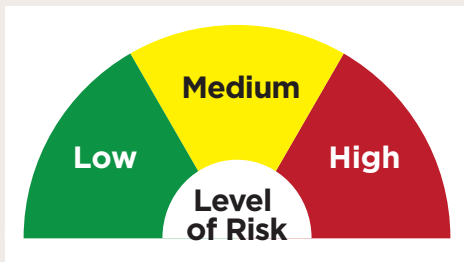
Overarching Categories	Indicators
 <b>Performance Management</b>	Indicator 1 – Monitoring Indicator 2 – Technical Assistance Indicator 3 – Performance Reporting and Evaluation
 <b>Subgrant Oversight</b>	Indicator 4 – LEA Applications Indicator 5 – SEA Subgranting Indicator 6 – General Provisions
 <b>Fiscal Oversight</b>	Indicator 7 – SEA Use of Funds Indicator 8 – LEA Use of Funds

NOTE: Table adapted from ED’s Title IV-A Fiscal Year 2022 Monitoring Plan.

subrecipients' risk regarding the acceptance of Federal funds. This evaluation is known as the entity risk assessment (ERA), and each SEA's ERA may look different depending on the indicators the state chooses to include as part of the assessment. Common risk factors include

- Funding amount awarded;
- Grantee spending habits;
- Staff turnover;
- Performance reporting;
- Program implementation; and
- Other issues related to timely communication and meeting deadlines.

One way SEAs may wish to organize information from a review of ERA data is to develop a ranking system with categories for low-, medium-, or high-risk LEAs. For a softer approach, the SEA could use a color-coded ranking system, like green, yellow, and red according to the area of risk. Once the elements of risk are determined, LEAs are ranked according to their level of risk, and SEAs can use these rankings to develop a list of LEAs to monitor. The type of monitoring visit an LEA would receive would be based on where the LEA is placed on the ranking list.



SEAs can clearly identify the risk factors used for their monitoring process and communicate the expectations to LEAs. LEAs may want to know more about why they received a particular rank designation, and the SEA should be prepared to articulate the selected risk factors and the reason for their selection. Transparency of the process and tools used throughout the monitoring cycle may help to relieve LEAs' stress around the visit.

SEAs can also provide training and technical assistance on the ERA and how it informs the state's annual monitoring plan. Communicating clear procedures helps alleviate the stress that comes with monitoring and helps prepare LEAs for a successful visit that can help improve the Title IV-A programs. Again, it is ideal to remind LEAs that monitoring is not an attempt to catch them doing something wrong; instead, it is the LEAs' opportunity to share their Title IV-A story and collaboratively make program improvements. Communicating the procedures that the SEA used in developing the risk assessment process helps LEAs understand that the monitoring process is fair and based on an objective set of indicators, which is ideal for the purposes of transparency.

## Monitoring Timeline

Monitoring is not a one-time event, but, instead, should be done on an ongoing basis throughout the year. One way to accomplish this is for SEAs to develop monitoring tools and resources for LEAs to use as an annual self-assessment. Then when LEAs are selected for an official monitoring visit, they are more sufficiently prepared for it.

### *Types of Monitoring*

Monitoring activities can be time-intensive, and a monumental effort would be required to thoroughly monitor every LEA each year. Therefore, it is important for SEAs to consider the types of monitoring and how to best utilize each one to maximize efforts and align with staff capacity. The three common types of monitoring are desk reviews, virtual, and on-site. SEAs should use information gleaned from the ERA to determine which type is most appropriate for their selected LEAs.

**Desk Review.** The first type of monitoring review is a desk review. This type of monitoring could be a random sample of LEAs regardless of risk level, could be done according to risk level, or could be done ahead of a virtual or on-site monitoring visit. A desk review consists of the LEA submitting documents to the SEA for review and is usually done on a smaller scale, with a narrower scope

and targeted documentation requirements. A desk review may or may not include an official call with the LEA and may only require the LEA to submit documentation and correspondence over email or another digital platform prescribed by the SEA.

The desk review can act as a stand-alone review, or it could be an initial requirement of a virtual or on-site visit. For example, the SEA may request that the LEA submit the following in a desk review:

- A self-assessment;
- Vendor contracts;
- Up-to-date budget and expenditure documentation;
- Policies and procedures;
- Time and effort records;
- Evaluation plans; or
- Other types of performance data in preparation for the virtual or on-site review.

**Virtual or On-Site Reviews.** SEAs can conduct more formalized monitoring visits either virtually or on-site. These types of monitoring visits may include a desk review ahead of the scheduled review, as stated above, and are typically accompanied by more formal documentation requirements, a structured protocol, and official meetings with LEA leadership. These types of monitoring reviews are based on the SEA risk assessment or part of an official monitoring plan, and they usually require more formal interviews with several LEA staff members, such as fiscal management staff, data management staff, and leadership.



## KEY TAKEAWAYS FROM UTAH

The State coordinator from Utah encouraged participants to be transparent and open with all parts of the process, to ask questions, and to ask for feedback with early documentation submissions to identify gaps before the official monitoring visit. She said, “admitting weaknesses was much more efficient than trying to claim they weren’t there.”

Virtual or on-site reviews typically include the following elements:

- A structured agenda;
- A review of the formal documentation submitted and its alignment with the protocol;
- Entrance and exit conferences; and
- A review of activities, equipment, or other items purchased with Title IV-A funds.

Upon completion of a virtual or on-site review, the SEA will provide the LEA a formal report with observations, findings, and follow-up or corrective action required of the LEA, if applicable. Regardless of the type of monitoring visit and the requirements, which can seem overwhelming and daunting to the LEA, SEAs can help alleviate stress by communicating the expectations and offer as much support and technical assistance as possible ahead of the visit.





**Figure 1: The OSSS Seven-Step Comprehensive Program Review Process**



NOTE: Adapted from ED's Title IV-A Fiscal Year 2022 Monitoring Plan.

## Monitoring Components

The typical monitoring process has three major stages: pre-monitoring activities, activities completed during the monitoring review, and follow-up or post-monitoring activities. Within the stages, there are seven steps that typically occur during the monitoring process. Some activities, such as communication, will span across all three stages of the monitoring process. This section of this brief uses the Seven-Step Comprehensive Program Review Process developed by ED as a framework to describe the types of activities that SEAs may consider implementing at each stage (see Figure 1).

### Steps 1-3: Pre-Monitoring Activities

The first set of steps occur before monitoring. Pre-monitoring activities can consist of several steps, including notification, planning, and document and data submission. Within these steps, the following areas may be addressed:

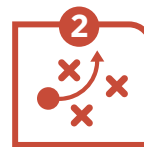
- Notifications;
- Expectations and guidelines;
- Documentation requirements, including LEA self-assessments;
- Submissions procedures;
- Scope of the monitoring visit; and
- Monitoring time frame.

Providing clarity in these initial steps during the pre-monitoring phase will aid the LEA in being prepared to gather and submit the requested documentation to the SEA in a timely manner. These pre-monitoring activities will also help set the expectations for the amount of time it will take

to prepare for the visit, which can certainly help alleviate anxieties about the time commitment for the monitoring visit.



**Step 1: Notify the LEA.** During the pre-monitoring activities, the SEA will conduct the initial outreach and notification to the LEA representatives, such as the superintendent and the Title IV-A coordinator, to discuss how they were selected for monitoring. These early discussions typically include the type of review (e.g., desk, virtual, or on-site), the documentation requested, a sample agenda if the monitoring is virtual or on-site, and the timeline.



**Step 2: Plan for Monitoring.** The SEA will inform the LEA how and where it will submit documentation. The SEA should specify if the documents will be submitted via an online format, such as an SEA Web-based portal or cloud-based sharing system, or if they prefer hard copies assembled in a binder for review. If a portal or system is to be used that may be unfamiliar to the LEA or requires special knowledge, specific instructions on how to use the system should be included.

The SEA may also share logistics of the visit, including how many people from the SEA will participate in the visit and a list of staff members the LEA should have available during the visit. The SEA should explain the initial agenda, who is responsible for drafting the documents, and any other logistics such as travel arrangements, if required.



### Step 3: Submit Required

**Documentation.** One important aspect of the pre-monitoring activities is the submission of supporting

documentation. A variety of tools can be used to ensure that LEAs submit adequate documentation needed for the SEA to conduct a comprehensive review that meets the needs of the monitoring. SEAs can provide self-assessments, documentation review checklists, or the actual monitoring tool with the documents that are needed to support compliance within each indicator for the monitoring assessment.

SEAs can provide LEAs with a self-assessment tool to help prepare them for the monitoring and to give them a sense of what to expect during the virtual or on-site review.

**Self-Assessment.** A self-assessment is a critical tool that SEAs can use as part of their overall monitoring plan. A self-assessment can help both SEAs and LEAs assess their compliance with regulatory statutes and requirements. ED created an SEA self-assessment tool as part of its monitoring process, which can also serve as an example that SEAs can use to create a self-assessment tool for LEAs. As stated throughout this guide, it is important for SEAs to maintain alignment with the processes and instruments that ED requires of them when



## KEY TAKEAWAYS FROM MINNESOTA

The Minnesota Title IV-A Team shared that for their monitoring process “it is important to keep equity at the forefront when monitoring and providing technical assistance of the process to its LEAs. It is important to measure what matters, in many cases, it is about ensuring that funds are properly spent but framing the focus of monitoring on valuing the people and the processes they engage to improve conditions for student learning.”

monitoring LEAs. This alignment helps show the LEA that the state is using similar tools to prepare for their own monitoring visits.

The self-assessment tool, at a minimum, should include a section that is specific to all the Federal statutory requirements that apply to the LEA for the Title IV-A program and indicators for the LEA to notate its degree of compliance. Category types for the indicators could include monitoring, performance reporting, evaluation, and use of funds and would ask prompting or guiding questions for the LEA to determine if it meets the compliance requirements.

In addition to statutory requirements, the self-assessment tool could have a separate section for state-specific requirements. For example, according to the Title IV-A statute, states must support LEAs in developing measurable objectives and outcomes that align to the purpose of the program, which is to improve

- Student academic achievement by providing students access to a well-rounded education;
- School conditions for student learning; and
- The use of technology and digital literacy.

To ensure that LEAs are making progress toward meeting these objectives and outcomes, a state may add additional requirements for reporting objectives and outcomes that align to the statute but



## KEY TAKEAWAYS FROM NEBRASKA

The State coordinator from Nebraska shared these valuable words regarding lessons learned from the monitoring process, which SEAs can pass along to the LEAs, “Go into the process with an open mind ... if something isn’t being done correctly consider it a learning opportunity to make the process better!”

are specific focus areas for the state. For example, an SEA might have a goal of increasing attendance or graduation rates, which aligns with the purpose of the Title IV-A program but is a specific focus for the state. For clarity, SEAs may want to create a separate section on the self-assessment tool for these state-based requirements.

The final section of the self-assessment tool may include an open response section that allows LEAs to write about their programs and rate themselves on their compliance status. For example, compliance statuses could be “In Compliance,” “Needs Improvement,” or “Not in Compliance” or something as simple as “Yes,” “No,” or “Needs Improvement.” If the self-assessment also serves as a document to request technical assistance, another area rating to include could be “Technical Assistance Needed.” After the LEAs determine their compliance level, they can provide supporting documentation of their compliance or reflection notes about what they need to do to improve, to become compliant, or to identify resources needed for support.

Ideally, LEAs will conduct the self-assessment periodically, preferably at least twice during the year, to assess improvement with any deficiencies. While the LEAs should use the tool to self-assess where they are with compliance-related requirements, the SEA can also use the self-assessment as part of the pre-monitoring activities.

**Documentation Review.** SEAs that monitor using document reviews can provide a documentation review checklist that LEAs can use to ensure that they have submitted in advance all the documentation that the SEA requests. Document reviews may be conducted prior to a virtual or on-site visit. Some SEAs may require LEAs to upload certain documents at specific intervals. The timeliness, accuracy, and completeness of the submission may be a factor in the review and assessment of the monitoring as well as analysis of the content of the documents themselves, as these factors may indicate challenges with internal controls. Documentation review may be a part of the virtual or on-site monitoring activities. To discuss the submission process transparently and accurately as an element of the monitoring, SEAs may want to clearly describe the elements or parameters for compliance within the monitoring tool so that the LEA is clear as to what the SEA is looking for to determine satisfactory compliance.

**Monitoring Tool Dissemination.** Just as ED disseminates the monitoring tool for SEA review and use during its monitoring process, SEAs should consider the dissemination of their monitoring tool to their LEAs to help them guide the preparation for their monitoring. The monitoring tool may have sections such as the ones listed above in the self-assessment tool: requirements and compliance categories. In addition to the requirements, SEAs may add statutory reference(s) to the requirements, a listing of methods to show compliance to the requirements, a section to document any findings, and an opportunity for the subrecipient to respond to the findings. The tool serves as an additional guide to the LEA for the process and gives it a preview of the monitoring activities.

## Step 4: Activities During the Monitoring Review

Once the pre-monitoring activities have been completed, the SEA can engage in the review selected by the SEA: desk review, virtual, or on-site

visit. If the desk review is the sole activity of the monitoring, the SEA may engage in the desk review by using the monitoring tool to assess the LEA's documents for compliance. Some desk reviews encompass the full scope of the monitoring. If that is the case, then the SEA would move to the next step in the process. Sometimes desk reviews illuminate concerns in specific areas of the program and not the whole program. If that is the case, the SEA may choose to engage in a *topic-specific* monitoring where the SEA may use only a section of the monitoring tool to conduct a more specific review of a specific topic area. For example, if the SEA found that all the LEA's timesheets were not signed or certified by a supervisor, the SEA may conduct a monitoring on the specific topic of time and effort.

If the SEA engages in a virtual or on-site visit, the SEA can continue communicating about the process the LEA can expect.



**Step 4: Monitoring Visit.** The agenda that was prepared ahead of the monitoring visit will guide visit procedures.

Activities the LEA can expect during a virtual or on-site monitoring visit may include, but are not limited to, the following:

- Entrance conference with LEA staff designed to confirm the agenda and set expectations of the visit;
- Overview of documents prepared or uploaded for the visit with the opportunity to answer any questions from the SEA;
- Clarification about the documents submitted and questions that arose during the submission process;
- Interviews with key LEA staff, students, or other stakeholders who are connected to the Title IV-A program; and
- Exit conference to review promising practices, opportunities for technical assistance, and any preliminary findings.

Before the SEA concludes the monitoring visit, it would ideally share any promising practices observed during its visit and review of documentation, request additional information as needed, and be sure to discuss any potential findings or opportunities for improvement observed during the visit so that the LEA is not surprised when it receives the draft report. Some SEAs may give LEAs an opportunity to correct some findings on-site, dependent upon the severity of the finding. Some findings may not be severe enough to be documented within the report but may be able to be corrected with feedback from the SEA staff members and their expertise. Other issues may arise to the point of documented findings and may be included within the final report. Maintaining open and honest communication throughout this stage and after will help reduce LEA stress, manage expectations, and increase the likelihood that any corrective actions are carried out both accurately and timely.

## Steps 5-7: Post-Monitoring Activities

Once the virtual or on-site monitoring visit is completed, the SEA should continue communicating and providing support to the LEA during the post-monitoring activities, whether they include the distribution of a formal report, closeout of the monitoring activities, or follow-up for corrective action. During this process, the SEA should clearly communicate the time frame or next steps for when it expects to provide information to the LEA or when it expects to receive follow-up materials from the LEA. As part of this follow-up communication, the SEA should detail the types of corrections it will accept during the process.



**Step 5: Draft Initial Report.** Following the virtual or on-site monitoring visit, the SEA will continue reviewing all documentation and information learned from the monitoring visit and begin to prepare the draft report. The report should include a list of attendees, dates of the monitoring activities, and any key issues found during the visit. Some SEAs



may choose to include a statement of compliance and the citation before identifying any area of noncompliance. The draft report should include the corrections the LEA needs to make to come into compliance and provide a time frame by which the LEA must respond to the report and initial findings. Some SEAs may choose to allow LEAs to respond to the draft report findings before the final report is issued. There may be several iterations of this process until a draft report is ready to move forward as the final version. In addition to providing an explanation of the issues that need resolution, an SEA may also choose to include highlights and positive aspects of the LEA's Title IV-A program.



**Step 6: Send Final Report.** The

SEA and LEA will continue to communicate throughout the draft report process until it is finalized. Many

SEAs require that monitoring reports be reviewed by senior leadership of the agency and be signed by the Chief State School Officer. Others may allow reports to be distributed at the Title IV-A office level or require a communications or legal review. Each SEA will follow its established process prior to distributing the final report. If there are no findings

that require corrective action, the SEA will send the final report to the LEA staff, and the monitoring process will conclude. If the monitoring activities are concluding, an SEA may document within the final report or in a letter to the LEA that the monitoring activity has concluded for the monitoring period.



**Step 7: Planning for Corrective Action.**

If the LEA has findings that require a corrective action plan, to help the LEA through this process, the SEA may provide a template for the corrective action plan for the LEA to complete and suggest documentation to submit as evidence that it has addressed the concerns. As with previous steps, the SEA should provide a timeline and continue to offer guidance and technical assistance for the LEA to complete the monitoring process. Once the SEA closes out the corrective action, a letter should be sent to the LEA indicating that the monitoring activity has concluded for that monitoring period. If the LEA does not complete the corrective action, the SEA may consider adding an element to its ERA for outstanding corrective actions. By doing this, the SEA provides itself a mechanism for following up on outstanding corrective actions so that they do not carry over from year to year.



## Conclusion

The goal for this brief was to help SEAs prepare LEAs for the state-level monitoring that the SEA is required to conduct as part of the LEAs' participation in the Federal Title IV-A grant. The brief provided an overview of the monitoring processes, including the risk assessment development and monitoring timeline. Additionally, this brief provided an overview of the various monitoring components, such as the different stages and expectations during pre-monitoring activities, activities completed during monitoring, and post-monitoring activities.

The monitoring components section of the brief used the Seven-Step Comprehensive Program Review Process developed by ED as a guiding framework for SEAs to consider mirroring when providing technical assistance and support to LEAs at each stage. It is important to acknowledge how stressful the monitoring process can be for LEAs so this guide emphasized how SEAs can ensure that monitoring is not an attempt to catch LEAs doing wrong, but, instead, to help them see it as opportunity improve their processes and, ultimately, improve their programs and student outcomes.



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