Coordinated Review Monitoring Webinar 10/7/22 FAQ

Which grants are included in this monitoring process?

This monitoring process will cover ESSER I / CARES, GEER I, CRRSA/ ESSER II, GEER II, ARP ESSER 3, and the ARP State Level Reserves.

*This monitoring process **will not** include the ARP HCY I, ARP HCY II, 611, or 619 funding. Please be advised 611 and 619 are being managed through the IDEA office.*

When will LEAs see the monitoring survey published in the Business Portal?

Due to the large number of LEAs that will be monitored between September 2022 and September 2024, LEAs will be separated into review groups to facilitate scheduling and the review process. The survey for your assigned review group will be published on the Survey Publish Date.

This timeline can be found here: [Education Stimulus Fund Monitoring](#)

Does NYSED expect to revise the survey over time, or will every LEA get the same survey?

NYSED does not anticipate revising the survey unless we receive corrective action from auditors.

Can LEAs utilize digital files to show evidence?

Yes, digital files are appropriate to provide evidence.

Will LEAs be required to provide payroll attestations?

The time and effort certification requirements apply to all Education Stabilization funding. Please see the guidance below for further information:

The Uniform Guidance requirements related to documenting personnel expenses at 2 CFR § 200.430(i) apply. Except as described in the paragraph below, this would mean that an LEA maintains the records it generally maintains for salaries and wages, including for employees in leave status, as long as payments to employees in leave status are made consistent with grantee policies and procedures that apply to all employees, whether they are paid with Federal or other funds. (For more information on paying employees in leave status, see the Department Fact Sheet at: https://www2.ed.gov/documents/coronavirus/factsheet-fiscal- questions.pdf.) An LEA must maintain time distribution records (sometimes called "time and effort" reporting) only if an individual employee is splitting his or her time between activities that may be funded under ESSER or GEER and activities that are not allowable under the applicable program. However, it is likely there will be very few situations in which an employee of an LEA would perform multiple activities where some are not allowable under ESSER and GEER, and thus would be required to maintain time distribution records,

given that an LEA is authorized to use funds on "activities that are necessary to maintain the operation of and continuity of services in [an LEA] and continuing to employ existing staff of the [LEA]" in order to "prevent, prepare for, and respond to" the COVID-19 pandemic.

https://oese.ed.gov/files/2021/05/ESSER.GEER_.FAQs_5.26.21_745AM_FINALb0cd6833f6f46e03ba2d97d30aff953260028045f9ef3b18ea602db4b32b1d99.pdf

Where can LEAs find the document that includes an explanation of the indicators?

The ESF Coordinated Monitoring Indicators and Evidence can be found on our monitoring webpage: Education Stimulus Fund Monitoring

A direct link to the indicators can also be found here as a link below: http://www.nysed.gov/common/nysed/files/programs/federal-education-covid-response-funding/education-stabilization-fund-coordinated-monitoring-indicators-and-evidence.pdf

If the indicators do not apply should the response be "Not Applicable?"

Yes.

Can LEAs use the indicators document to begin reviewing our records?

Yes. The survey in the Business Portal is being built to align directly with the indicators.

What level of detail should LEAs start with for expenditure reporting? Does NYSED want expenditure reports from the financial system or are they looking for payroll records, invoice copies, purchase orders, etc.?

LEAs should look at the level of detail where they can confidently justify the expenditures being made. For example, an LEA primarily paying staff salaries would look at payroll records. An LEA with third-party contracts for goods and services would be looking at those contracts and purchase orders.

Will NYSED require all the purchase orders and contracts, or can the reviewer request a sample?

This sometimes depends on the size of the district. LEAs that have 10 or more Title I schools can provide a sample. The sample size would need to represent at least 25% of their allocation.

Regarding Section I Sustainability, what is meant by activity/program? Would every staff position supported by these grants need to be listed in this chart?

This section is requesting information about what activities and programs the LEA will continue to fund. For example, the LEA could list Summer Learning under this section instead of each specific position associated with Summer Learning.

What is the evidence required for Indicator 3 under Return to In-Person Instruction since there

are no longer any CDC revisions required to the in-person instruction plan?

Consistent with section 2001(i)(2) of the ARP Act, LEAs are required to seek public input on whether to revise its plan and on any revisions to its plan no less frequently than every six months. Evidence should indicate the LEA discussed CDC requirements as appropriate.

Regarding stakeholder engagement, do indicators 4 and 5 only apply to the ARP ESSER State Reserve Funds?

Indicator 4 would apply to ARP ESSER and the ARP ESSER State Reserve Funds. Indicator 5 is regarding the comprehensive needs assessment that only applied to the ARP State Level Reserve funds.

Where can LEAs find definitions of the different evidence tiers?

Definitions of the different evidence tiers can be found in the document library of the ARP ESSER State Reserve application.

http://www.nysed.gov/accountability/evidence-based-interventions

If an LEA used one of the evidenced-based interventions suggested by the State in the application (high dosage tutoring, summer learning, etc.) what should the response be in the chart under evidence?

The monitoring review survey will include a drop-down menu and have evidence tiers 1-4 listed. LEAs could list tier 1 for this example provided. LEAs should note that they only have to upload their evidence base if NYSED requests it.

What is required to satisfy the results in the charts for ARP ESSER State Level Reserves?

Results could be based on the method of evaluation that the LEA stated they were completing for the 20% within the ARP ESSER 3 or for the chart within the ARP ESSER State Level Reserves.

Could this include trends in student performance?

This could include the LEA reporting the results of a summer program to their school board, testing results, attendance results, behavioral results, etc. LEAs could share those types of materials and the results of an internal review if one was conducted.

In the chart does the term "investment" refer to the amount allocated, or the amount spent?

This largely will depend on what review group the LEA is assigned to. The investment could be planned or if the LEA has already spent their funds, it would be the amount spent for any specific program.

What about the allowable costs chart in Fiscal Compliance, is this budgeted or expended?

This will depend on what review group the LEA is assigned to and where their review process falls. If an LEA falls early in the review process, they will look at what they have allocated. If they fall later, they will look at what they have expended.

Could there be findings related to the tier of evidence that was selected?

In the document, there is a section to state the tier of evidence LEAs are selecting. NYSED could ask to see the evidence base that you used when deciding on these or what the LEA collected that shows this program or activity did affect student achievement.

If the LEA has already submitted its final expenditure report and received the funding, what corrective action could be required?

This answer is dependent on the nature of the finding. Depending on what the finding is, NYSED will work with LEAs to find a reasonable resolution that is the least risky. An example of what a resolution could look like would be NYSED having a conversation with the LEA about if they had any allowable expenditures in their general funds that could be allowable under these funding sources and making a note of this.

What is required of districts to ensure non-public schools access their funds beyond email reminders?

LEAs should demonstrate that they have made a good-faith effort to provide equitable services to all participating non-public schools. Good faith effort means meaningful engagement and timely deadlines that occur throughout the life of the grant.

If the non-public schools did not spend all the funds allocated and have agreed they no longer will spend them, can the LEA re-allocate those funds to another line item in their budget?

The LEA must first ask all other eligible non-public schools if they are interested in their appropriate portion of the share being declined. If all those non-public schools provide written declinations, then the LEA may use those funds for services.

What happens if LEAs could not get the participating non-public schools to spend all their money and have attempted to contact them multiple times with no success? Should LEAs submit their final cost reports short of the full amount equal to what the non-public schools did not spend?

The LEA should make good faith efforts to do outreach, including clear deadlines and expectations in writing. At this time, the LEA will submit short of that full amount.

We currently have this question out to USDE and will share if we receive more information before FS-10Fs are submitted.

For non-public schools, if LEAs kept a spreadsheet of the number of times they reached out

regarding equitable funds, would it suffice as evidence?

Yes. A spreadsheet containing that information would be a great piece of evidence as part of the entire picture. Copies of emails and letters would also be a component to support this evidence.

Should LEAs note on their FS-10F which purchases were made for specific non-public schools?

The LEA may want to note this for their own internal processes and tracking, but it is not a requirement for the FS-10F.

Where can LEAs find the guidance that requires them to post these documents publicly?

NYSED designed the ARP application to serve as the LEAs plan and this guidance was written into the statute for ESSER funding. According to the Interim Final Rule, LEAs are required to make their plans publicly available on their website including any revisions made to the plan. The LEAs plan would consist of the application, FS-10, Budget Narrative, FS-10A, and FS-10F.

What documents need to be posted on the LEAs website and available to the public?

The LEA is required to make their plan publicly available and post it which includes the FS-10, Budget Narrative, FS-10A, and FS-10F. *The LEA is not required to post the FS-25.*

If the FS-10A had attachments do those attachments need to be posted as well?

Yes. If the LEA included an attachment on their FS-10A because the number of lines was not sufficient or detailed further information, those should be posted as well.

If in collaboration with stakeholders an LEA decides to use funds within a budget code line in a different way but does not need to move funds within codes, would an FS-10A still need to be submitted?

According to Grants Finance guidance, LEAs should be contacting their assigned reviewer prior to making any changes to their plans. We have been advising LEAs to file what is called an informal amendment for these changes that do not meet the requirements of filing a formal FS-10A.

Do FS-10A's need to be submitted for changes within budget codes that are less than 10%?

This would most likely be an informal amendment. LEAs can contact their assigned reviewer who will advise them if a formal amendment needs to be submitted.

If when the original FS-10 was written for staff salaries they were estimated, but now actual salaries are known such as the FTE rate being .95 instead of the original 1.0, would an amendment be required?

If this change does not exceed the amount budgeted for salaries the LEA may not be required to

submit a formal amendment. LEAs should contact their assigned reviewer who will advise them whether a formal amendment or an informal amendment needs to be submitted.

Where can the form for an informal FS-10A be located?

An informal FS-10A can be filled out on the same FS-10A form and numbered 000. The FS-10A form can be found at the following link.

[NYSED Grants Finance - Forms](#)

Should LEAs submit an FS-10F annually or at the end of the project period?

FS-10Fs should not be submitted until after all encumbrances have been liquidated (bills paid) but no later than 10/30/22 for CARES, 10/30/23 for CRRSA, and 10/30/24 for ARP funding.

Will NYSED apply to USDE for the "late liquidation" of Education Stabilization funds?

At this time NYSED does not have a late liquidation extension and is hoping to have more information available soon.

Are the LEAs able to get the indicators and evidence document as an Excel document so they can cut and paste the language into our planning documents?

Yes. NYSED is currently working on an Excel version for LEAs. This will be uploaded the ESF Monitoring Website.

Should LEAs be using the STE code for all ARP grants?

NYSED is awaiting more information from the State Aid unit regarding this question.

Why has NYSED decided to go the route of auditing every district versus a sampling of districts?

Please be advised this monitoring review is not an audit. This process is designed to ensure we are providing optimal technical assistance and looking at indicators that weren't assessed as part of the application process. Applications that were approved were substantially approvable applications and we are now in the process of going back and looking at evidence to support the work from the implementation of these programs.

Please be advised the Office of Audit Services will be developing a process for auditing.

When will this FAQ be posted and how can LEAs access it?

This FAQ will be posted to the linked website on October 21, 2022.

[Education Stimulus Fund Monitoring](#)