



Monitoring Overview

Monitoring the use of funds is a **grant requirement** and benefit to awardees. Monitoring Self-Assessment form will **open September 15, 2023 and close November 30, 2023**. Cash Requests and Amendments will not be processed if the Self-Assessment is incomplete or late until the LEA meets submission requirements. OPI is committed to collaborating with Local Educational Agencies (LEAs) to use the monitoring process as an opportunity to move beyond compliance and focus on what matters most – demonstrating outcomes for students through implementation of effective practices resulting from use of funds (ESSER I, II, III).

Monitoring is a process whereby operational, technical, and fiscal management performance aspects of a grant are reviewed by collecting and analyzing information from reports, firsthand observation, surveys, and other resources. The Office of Public Instruction's **goal** in monitoring is to help build the capacity of school districts so that they are **aware of federal funding requirements**, have the **ability to self-assess** against the requirements of the grants, and **understand how they can utilize** funding under the grants to improve services and secure resources. Monitoring begins during the application review process and provides an opportunity to support, collect and evaluate information provided by LEAs. Ongoing E-Grants amendment and cash request processing provides a second point of monitoring. The self-assessment provides an additional monitoring which allows the LEA to identify challenges in meeting compliances. Throughout the life cycle the ARP Plan (Use of Funds) and Safe Return Plan have provided an additional method for monitoring and documenting ESSER fiscal and program efforts.

The [Department of Education](#) requires all federal grants/funding streams be monitored. How that monitoring is undertaken is guided by several standard auditing and fiscal management principals, practices, guidelines and laws including but not limited to [OMB Office of Federal Financial Management](#). Many of these side boxes replicate the requirements; however, some are unique to that section only.

Recommended Participants: ESSER LEA Program Director(s), LEA Program Attorney(s), LEA Program Accountant(s) or Other Subrecipient).

SEA: [Description](#): Congress funded the Elementary and Secondary School Emergency Relief Fund through the Coronavirus Aid, Relief, and Economic Security Act (ESSER I), the Coronavirus Response and Relief Supplemental Appropriations Act (ESSER II), and the American Rescue Plan (ARP ESSER). The **Department awarded grants to State educational agencies (SEAs)** for the purpose of providing local educational agencies (LEAs), including charter schools that are LEAs, with emergency relief funds to address the impact that COVID-19 has had, and continues to have, on elementary and secondary schools across the Nation. Funds must be used for allowable activities to prevent, prepare for, and respond to COVID-19. Under ARP ESSER, **States were required to develop and to submit** to the Department **plans** for how they would **use ARP ESSER funds** to safely reopen schools and provide academic and mental health supports for school communities to address learning loss resulting from the COVID-19 pandemic.

Subrecipient or LEA: [Description](#): A grantee and its subrecipients can only use program funds for **allowable costs**, as defined in the **Uniform Administrative Requirements, Cost Principles, and Audit Requirements (2 C.F.R. Part 200)**, which include, among other things, the **requirement that costs be reasonable and necessary for the accomplishment of program objectives**, which are to prevent, prepare for, and respond to coronavirus. Additionally, with funds not otherwise allocated, a State may reserve a reasonable amount necessary to administer the grant.

Purpose

- **Focus on What Matters** by assisting LEAs in making progress toward increased student achievement and improved quality of instruction for all students through effective implementation of public (Federal and State) and nonpublic resources;
- **Reduce Burden on LEAs** by combining and streamlining monitoring protocols for federally funded programs and key private funded programs;
- **Improve Communication with LEAs** by strengthening their constructive partnerships with OPI through continuous feedback and assessment of the OPI monitoring resources, process, and systems;
- **Differentiate and Customize Support for LEAs** by using the monitoring system to identify assistance to support LEA needs and provide mechanism for improving OPI overall System of Support; and
- **Ensure Basic Requirements Are Met** by reviewing program and fiscal requirements, to safeguard public and nonpublic education funds from waste, fraud, and abuse.

ESSER Program and Fiscal Requirements

The responsibility for monitoring ESSER funding resides with OPI to oversee ESSER I (CARES), ESSER II (CRRSA), and ESSER III (ARP) grants under the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards grants. The program requirements can be divided into three main categories: **application, spending, and reporting**. These main categories strive to build accountability and transparency of federal ESSER dollars.

OPI will use the results of this self-assessment to identify training, support, or guidance needed by LEAs to improve implementation of ESSER and other grant programs. For example, if the LEA has undergone significant administrative staffing challenges during Covid, an identified support could be OPI assistance in recruiting, transitioning, and training new staff. If challenges occurred in compliances with engaging stakeholder input, an identified support could be OPI assistance in developing guidance sessions on how to engage the public.

Directions:

To complete the self-assessment, LEAs should review the grant requirements in the box titled: **Compliances** and reflect on current practices related to their implementation of the requirements. Retrieve the district's [assessment form here](#). The assessment form is in Excel format, similar to the data collection done for the ESSER Annual Report in May 2023. (A copy of the district's data can be obtained in the same folder as the assessment form.) In most sections of the Self-Assessment, there are only **three possible answers: Yes/No or unable to determine at this time**. Additionally, each section will be accompanied by a narrative response giving the opportunity to identify additional support(s) that might be provided or supported by OPI to assist in LEA compliance or noting the reason why the "unable" was selected. **The LEA may use a team approach to filling out the form**; however, only one submission per district is allowed. The submission of the Self-Assessment is required to be uploaded by the district's Authorized Representative.

Compliances:

Description: (page1) Basic Compliance is regulated by:

- [Davis-Bacon and Related Acts](#)
- EDGAR
- [34 C.F.R. 76.50](#)
- [34 C.F.R. 76.51](#)
- [34 C.F.R. 76.300](#)
- [34 CFR 76.600](#)
- [34 CFR 75.600-75.618](#) – link takes to Titles
- [34 C.F.R. 76.789](#)
- [34 C.F.R. 76.792](#) – link takes to 76.301
- [Uniform Guidance 2 C.F.R. 200.331\(a\)](#)
- [2 CFR 3474](#)

A grantee and its subrecipients can only use program funds for allowable costs, as defined in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements (2 C.F.R. Part 200), which include **the requirement that costs be reasonable and necessary for the accomplishment of program objectives**, which are to prevent, prepare for, and respond to coronavirus.

Examples of evidence to demonstrate compliance include:

- Receipts
- File date stamps
- Accounting reports
- Project scopes
- Payroll documentation
- E-Grants records
- Emails and other communication from other government agencies

Application

1. How did the LEA develop ESSER II and ESSER III application (process and who was involved)?
2. Did the LEA submit any additional information to OPI as part of the initial application (ESSER I, II, and/or III)? If yes, give narration to explain.
3. What type(s) of guidance or technical assistance did OPI provide regarding budgeting for ESSER (I-III)?
4. In the initial application, what were three major categories of proposed uses of ESSER I funding?
5. In the initial application, what were three major categories of proposed uses of ESSER II funding?
6. In the initial application, what were three major categories of proposed uses of ESSER III funding?
7. Was there additional guidance from OPI for construction, capital expenditure, large projects? If Yes, describe the guidance and the general date of the guidance provided.
8. Was there a change in the way the LEA identified needs and set budget priorities from ESSER I, II and III? If Yes, give narration.
9. Did the LEA submit their **Final Expenditure Report** for ESSER I by September 2022?
10. Will the LEA be able to submit their ESSER Consolidated (ESSER II) **Final Expenditure Report** for by October 2023? If no, give narration.
11. Does the LEA see any reason they **cannot** submit their **Final Expenditure Report** for ESSER III Consolidated by October 2024? If no, give narration.

Assurances were agreed to in the E-Grants initial applications of ESSER I, II, and III under the tab headings of: Common Assurances, ESSER Assurances, GEPA Assurances, and Final Assurances. Additional compliances were agreed to for large and capital expenditure and/or construction projects using ESSER funding as projects were submitted for further individual review.

NOTE these question numbers will not always match with the Excel input document because Yes/No and Text answers are combined.

Please rate how well your LEA has implemented the requirements as described above.

We are not implementing these requirements and would benefit from support.

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We are fully implementing these requirements and do not need additional support.

Processing:

12. Do the ESSER II and III budget pages, including Expenditure Description and Itemization, contain sufficient detail that a member of the public could determine what is being purchased?
13. Do the ESSER II and III budget pages, including Expenditure Description and Itemization, contain sufficient detail that a member of the public could determine how the purchase relates to the grant objectives of **prepare, prevent, respond to covid**?
14. Do the ESSER II and ESSER III Property and Equipment line items match budget page Expenditure Description and Itemization descriptions?
15. Has your district's grant management team read all of the grant compliances noted in the E-Grants application (Assurances Common and Program)?
16. Does your district understand how these compliances relate to ESSER?
17. Does your district have projects that fall under the Davis Bacon guidelines?
18. Have all of the cash requests been approved without being returned for changes?
19. Did the LEA's fiscal plans and procedures demonstrate control of funds and acquired property for ESSER I?
20. Did the LEA's fiscal plans and procedures demonstrate control of funds and acquired property for ESSER II?
21. Did the LEA's fiscal plans and procedures demonstrate control of funds and acquired property for ESSER III?

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LEA Use of Funds Plan

LEAs are required to develop and submit a plan for how the LEA will use ESSER III funds. **The plan must:**

- describe the process for determining student and staff academic, social, emotional and mental health needs;
- describe how the LEA will use the 20% to address the academic impact of lost instructional time through the implementation of evidence-based interventions;
- describe how the LEA will spend its remaining funds;
- describe how the LEA will ensure that interventions will address the academic, social, emotional and mental health needs of students, particularly students from historically underserved populations.

Compliances

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- [34 C.F.R. 76.792](#) – link takes to 76.301
- [Uniform Guidance 2 C.F.R. 200.331\(a\)](#)
- [2 CFR 3474](#)

Assurances were agreed to in the EGrants initial applications of ESSER I, II, and III under the tab headings of: Common Assurances, ESSER Assurances, GEPA Assurances, and Final Assurances. Additional compliances were agreed to for large and capital expenditure and/or construction projects using ESSER funding as projects were submitted for further individual review.

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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We are fully implementing these requirements and do not need additional support.

ESSER Use of Funds

(Additional Expenditure under Fiscal)

29. Does the LEA have processes in place to ensure that expenditures using ESSER funds match the activities approved by OPI through their ESSER application(s)?
30. Does the LEA have processes in place to ensure that funded and implemented activities comply with federal statutes, regulations, and terms and conditions of the grant program, including those outlined in the application, assurances, and grant award letters?
31. Does the LEA have processes in place to ensure ESSER-funded activities were obligated within the performance period (on or after March 13, 2020) and prior to September 30, 2022 for ESSER I, prior to September 30, 2023 for ESSER II, and prior to September 30, 2024 for ARP ESSER III?
32. Does the LEA have processes in place to ensure funded and implemented activities are reasonable, necessary, and allowable, in order for the LEA to respond to, prepare for, or prevent the spread of COVID-19?
33. Did the LEA use ESSER I, II, or II for Employee compensation/payroll (including salaries, wages, bonuses, stipends, incentives, and benefits)? Object codes: 1XX, 2XX series
34. Did the LEA use ESSER I, II, or II for Capital Expenditure, large projects, construction? Object codes: 7XX
Object code: series depends on type of purchases for construction
35. Did the LEA use ESSER I, II, or II for Purchased services? Object codes: 3XX, 4XX, 5XX series
36. Did the LEA use ESSER I, II, or II for Supplies? Object code: 6XX
37. Did the LEA use ESSER I, II, or II for Travel and related expenditures? Object code: 5XX, 8XX or Indirect costs
38. Does the LEA have a school budget transition plan for ESSER funding phase-out?
39. Has the LEA participated in monitoring activities such as local audit, ESSER Team Individual Session Review, independent consultant review for ESSER? If yes, give narration.
40. Apart from Single Audits, has the LEA received any comments or findings from any Federal audit or monitoring in the past three (3) years?
41. Has the LEA had a change in accounting systems, procurement policies or systems, or HR systems in the last three (3) years? If yes, give narration.
42. Does the LEA have a procedure or methodology in place to timely report in writing any noted violations involving fraud, bribery, or gratuity that may potentially affect the Federal award (2 CFR §200.113)? If yes, give narration.
43. Does the LEA have written conflict of interest policies for Federal awards that include a method of disclosure to the Federal awarding agency or pass-through entity of any potential conflicts of interest (2 CFR §200.112)? If yes, give narration.
44. Does the LEA take reasonable measures to safeguard all protected personally identifiable information and/or any other information designated sensitive by the Federal awarding agency, pass-through entity, or the LEA itself (2 CFR §200.303E)? If yes, give narration.
45. Does the LEA manage all federal grant funds (cash) centrally (e.g. - at the district or school/program level)?
46. Has the LEA been made aware of any incidents of theft, misappropriation, or legal claims related to federal funds?

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We are not implementing these requirements and would benefit from support.

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We are fully implementing these requirements and do not need additional support.

Large Projects, Construction, Capital Expenditures

Capital Property and Equipment and Construction

53. Did/Does the LEA use any federal funding for new construction projects?
54. Did the LEA receive written documentation on approval of construction projects prior to beginning project?
55. Does the LEA follow all rules including but not limited to Davis-Bacon, Build America, Buy America Act, and Annual real property reporting?
56. What type of information did the LEA submit to OPI as a part of the additional review process **BEFORE** June 30, 2022?
57. What type of information did the LEA submit to OPI as part of the additional review process **AFTER** July 1, 2022?
58. What guidance did OPI provide to LEAs regarding the requirements under Davis-Bacon and other requirements around construction, renovation, and other applicable projects **BEFORE** June 30, 2022?
59. What guidance did OPI provide to LEAs regarding the requirements under Davis-Bacon and other requirements around construction, renovation, and other applicable projects **AFTER** July 2022?
60. Does the LEA currently have written policies and/or procedures regarding the management/tracking of capital equipment including who, what, when, and how an activity is performed?

Compliances

(2 CFR §200.313, 2 CFR §200.439(b))

(34 CFR §75.600-75.617)

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Note this excludes minor remodeling projects as defined in 34 CFR §77.1 and maintenance

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Resources

1. [Uniform Grant Guidance \(2 CFR Part 200\)](#)
 - a. <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1>
2. [US Department of Education’s Cost Allocation Guide for State and Local Governments, Section VI \(pg26\)](#)
 - a. <https://www2.ed.gov/about/offices/list/ocfo/fipao/costallocationguide92019.pdf>
3. [Construction Guidance Summary \(Colorado Dept of Education\)](#)
 - a. <http://www.cde.state.co.us/esserconstructionguidance>
4. [DOE Slides: Using COVID-Relief Funds for Facility Upgrades, Renovations, and Construction - Sept 2021](#)
5. [ESSER Construction and Capital Expenditures - Oct 2021](#)
6. [DOE ESSER/GEER FAQ Sections B6 and B7 \(pages 28-34\) - Dec 2022](#)
7. [CCSSO Guidance - ESSER Funds for Construction - Dec 2021](#)
8. [SAM.gov Exclusions \(Suspensions and Debarments\)](#)
 - a. <https://sam.gov/content/exclusions>
9. [Policies and Procedures Guidance \(Colorado Dept of Education\)](#)
 - a. <http://www.cde.state.co.us/cdefisgrant/cderefcrepro>

Please rate how well your LEA has implemented the requirements as described above.

We are not implementing these requirements and would benefit from support.

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We are fully implementing these requirements and do not need additional support.

Safe Return and ARP Plans

- 62. What means were used to gain meaningful stakeholder engagement?
- 63. What consultative efforts took place in the development of the LEA plans?

Safe Return and Continuity Plan

- 64. Has the LEA revised (and updated as needed) the Safe Return at least every six months, and posted this revision to their website, with district identification and date last updated?
- 65. Has the LEA provided and documented meaningful stakeholder engagement on the Safe Return Plan during each revision? If yes, give narration.
- 66. Did the LEA record public comments on Safe Return Plan?
- 67. Has the LEA provided and documented meaningful stakeholder engagement on the Safe Return Plan during each revision?
- 68. Did the LEA document feedback on public comment on Safe Return Plan?
- 69. Did the LEA document public comment dates on Safe Return Plan?
- 70. Did the LEA document pre- and post- drafts on website of the Safe Return Plan?
- 71. Did the LEA document information provided to the public on Safe Return Plan?

Each LEA that accepted funds under ARP ESSER III was required to complete a Safe Return Plan and ARP Plan/Use of Funds Plan. Each LEA was required to review (and revise if necessary) these Plans, at least every 6 months. LEAs were further required to make them publicly available by posting on their website and engage the public in meaningful stakeholder input.

The **Safe Return Plan** to In-Person Instruction and Continuity of Services summarized the strategies the LEA used to ensure the safety and health of students and staff as they returned to school.

The **ARP Plan/Use of Funds** Plan includes the LEA's process for identifying the academic, social, emotional, and mental health needs, how the LEA is planning to address the needs through ESSER-funded interventions, and how the LEA will measure the impact of those interventions to ensure that identified needs have been addressed.

ARP Plan

- 72. Has the LEA revised (and updated as needed) the ARP Plan at least every six months and posted this revision to their website?
- 73. Describe the technical support provided by the LEA in the development of the ARP Plan/Use of Funds Plans to select evidence-based interventions to address the disproportionate impact of COVID-19 on certain groups of students as it relates to (1) the impact of lost instructional time, (2) summer learning and enrichment, and (3) comprehensive afterschool interventions. Describe any data used to determine interventions.
- 74. Did the LEA record public comments on ARP Plan?
- 75. Has the LEA provided and documented meaningful stakeholder engagement on the ARP Plan during each revision?
- 76. Did the LEA document feedback on public comment on ARP Plan?
- 77. Did the LEA document pre- and post- drafts on the website of the ARP Plan?
- 78. Did the LEA document information provided to the public on ARP Plan?

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Please rate how well your LEA has implemented the requirements as described above.

We are not implementing these requirements and would benefit from support.

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We are fully implementing these requirements and do not need additional support.

Reporting Annual Program and Fiscal Reports

- 80. Did the LEA submit ESSER I annual report FY2020 on time and accurately?
- 81. Did the LEA feel confident in submitting the report?
- 82. Did the LEA submit ESSER II annual report FY2021 on time and accurately?
- 83. Did the LEA feel confident in submitting the report?
- 84. Did the LEA submit ESSER III annual report FY2022 on time and accurately?
- 85. Did the LEA feel confident in submitting the report? Give narration in support of your answer.
- 86. Please rate how well your LEA has implemented the requirements as described above.

Please rate how well your LEA has implemented the requirements as described above.

We are not implementing these requirements and would benefit from support.	1 2 3 4 5 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	We are fully implementing these requirements and do not need additional support.
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General Education Provisions Act (GEPA)

- 87. Does the LEA have a process for annually reviewing and implementing the steps outlined in the GEPA statement to ensure equitable access to, and participation in, its federally assisted programs for students, teachers, and other program beneficiaries with special needs?
- 88. Can the LEA demonstrate that it is implementing the steps outlined in their GEPA statement(s) to overcome any identified barriers and that each program has been administered in accordance with applicable statutes and regulations?

Assurances were agreed to in the EGrants initial applications of ESSER I, II, and III under the tab headings of: Common Assurances, ESSER Assurances, GEPA Assurances, and Final Assurances. Additional compliances were agreed to for large and capital expenditure and/or construction projects using ESSER funding as projects were submitted for further individual review.

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Please rate how well your LEA has implemented the requirements as described above.

We are not implementing these requirements and would benefit from support.	1 2 3 4 5 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	We are fully implementing these requirements and do not need additional support.
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ESSER III: Learning Loss Set-Aside

- 89. How did the LEA **initially** propose to use ARP ESSER funds to address learning loss (20%)?
- 90. How does the LEA **currently** propose to use ARP ESSER funds to address learning loss specifically funded from the 20%?
- 91. Were other funding sources applied to the areas where 20% Learning Loss Set Aside was used? If Yes, give narration.

[DOE ESSER/GEER FAQ - Dec 2022](#)

A-4.b. In meeting the ARP ESSER requirement to use at least 20 percent of its ARP ESSER allocation to address the academic impact of lost instructional time and address the disproportionate impact of COVID-19 on underserved populations, may an LEA include the costs associated with implementing an evidence-based strategy that advances this purpose? (New December 7, 2022)

C-3; C-25.. LEAs must reserve at least 20 percent of their ARP ESSER funds to address the academic impact of lost instructional time through the implementation of evidence-based interventions, which may include summer programs, particularly to address the disproportionate impact of the COVID-19 pandemic on underserved student subgroups.

Examples of activities that meet this requirement include:

- [Extended \(day\) and Expanded \(calendar\) Learning Opportunities \(Summer and Afterschool\)](#) ([OPI ELO Summer/Afterschool Website](#))

Evidence-Based Interventions

Activities designated as part of the 20% set aside must meet the requirements for an evidence-based intervention (EBI) as designated by [Every Student Succeeds Act \(ESSA\)](#). The research-base can fall into any of the four categories

Evidence Based Categories:

Strong - Supported by an experimental or randomized control trial (RTC) study.

Moderate - Supported by at least one quasi-experimental study.

Promising - Supported by at least one correlational study with statistical controls for selection basis.

Demonstrates a Rationale - Supported by relevant research or an evaluation which suggestions that the intervention is likely to improve a student outcome or other relevant outcome.

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1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We are fully implementing these requirements and do not need additional support.

Providing Equitable Services ESSER I

93. Does the LEA have nonpublic schools (private and home schools) within their district boundaries?
94. Did the LEA conduct consultations to determine the nonpublic school proportionate share for ESSER I?
95. How did the LEA inform the nonpublic of ESSER Funding availability?
96. Did the LEA ensure that all eligible nonpublic schools were consulted in a timely, meaningful, and ongoing manner with documentation of outreach?
97. Did the LEA document and maintain communication with nonpublic schools regarding ESSER funding?
98. Did the LEA have a process that it followed for determining and distributing the proportionate share of federal funds to provide equitable services to nonpublic schools?
99. Did the LEA have a process that it followed to ensure nonpublic schools' federally funded activities match those described in the approved budget items from the application for funds and for activities that are secular, neutral, and non-ideological?

In the same manner as ESEA Section 1117, LEAs with non-public schools must make services available under ESSER I to eligible students based on consultation with the non-public schools. Through the consultation process, LEAs and non-public schools discuss the amount of funding available and the allowable uses of funds.

Please rate how well your LEA has implemented the requirements as described above.

We are not implementing these requirements and would benefit from support.

1	2	3	4	5

We are fully implementing these requirements and do not need additional support.

Providing Equitable Services:

Please provide any additional information you would like to share with OPI regarding how the LEA provides Equitable Services. This may include self-identified strengths and areas for improvement, a description of processes and procedures, and/or links to documentation that supports the requirements in this section.

ESSER State Reserve Funds

The ESSER state set-aside competitive grants provide additional emergency relief funds to programs that address issues related to COVID-19, including addressing immediate needs and recovery of learning loss.

Has the LEA has received additional funds through any of the following ESSER State Reserve program(s):

- 21st Century Community Learning Centers (CCLC)
- K-8 Mathematics Curricula & K-3 READ Act Instructional Programming Grant
- Broadband Connectivity Grant
- Education Workforce Program
- Empowering Action for School Improvement (EASI)
- Extended/Expanded Learning Opportunities (ELO) Grant Program
- ESSER Transportation Assistance Grant (ETAG) Program

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Time and Effort

2 CFR §200.430, 431 and ED Cost Allocation Guide

- 101. Does the LEA have written time and effort policies and/or procedures describing who, what, when and how an activity is performed? If yes, give narrative example.
- 102. Does the LEA maintain adequate supporting documentation as part of its time and effort procedures (timesheet, certification, etc.)?
- 103.

Procurement

(2 CFR §200.318, 319, and 320)

- 104. Does the LEA currently have written procurement and/or procedures describing who, what, when and how an activity is performed? If yes, give narration.
- 105. Do the LEA's policies and/or procedures include documented review of the suspension and debarment list at SAM.gov for applicable vendors?
- 106. Do the LEA's policies and/or procedures include a requirement that construction-related contracts follow applicable rules such as Davis-Bacon requirements, real property reporting requirements, etc.?
- 107. Do the LEA's policies and/or procedures include tagging and tracking of noncapital/walkable items (e.g. check in/out list)?
- 108. Does the LEA maintain adequate supporting documentation as part of procurement procedures? If yes, give narration.
- 109.
- 110.

Note the federal guidance defines **equipment** as tangible personal property having a useful life greater than one year and a per unit acquisition cost at or exceeding the capitalization threshold for the entity or \$5K, whichever is less.

The process performed when capital equipment is received (what type of capital equipment is tagged, what position/office performs the tagging, etc.)

Inventory

- 111. Do the LEA's policies and/or procedures include a definition of capital equipment?
- 112. Do the LEA's policies and/or procedures include a process to adjust the inventory records in the event the property is disposed (sold, lost, stolen, decommissioned, cannot be repaired, etc.)?
- 113. Do the LEA's property records include a description and serial number?
- 114. Do the LEA's property records include source of funding for property, including FAIN# (Federal Award Identification Number); and CFDA# (federal assistance number)?
- 115. Do the LEA's property records include the title owner, acquisition date, cost and location of the item?
- 116. Do the LEA's property records include percentage of cost related to Federal participation for the program under which the property was acquired?
- 117. Do the LEA's policies and/or procedures include the date of disposal and sale price?
- 118. Does the LEA perform a physical inventory and reconcile the results with the property records at least once every two years?

NOTE these question numbers will not always match with the Excel input document because Yes/No and Text answers are combined.

Please rate how well your LEA has implemented the requirements as described above.

We are not implementing these requirements and would benefit from support.

1	2	3	4	5
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

We are fully implementing these requirements and do not need additional support.

Certification

This certification must be signed by an Authorizing Official. This page may be printed, signed, and submitted in Google Form or an official digital signature may be used.

I hereby certify that, to the best of my knowledge, the provided information is true and accurate.

Printed Name and Title: _____

Signature and Date: _____

Providing Equitable Services: Our LEA would benefit from the following support(s) to improve our implementation of the requirements in this section: (select all that apply).

- Additional training from OPI (Office Hours, Regional Network Meetings)
- Individualized technical assistance from OPI
- Access to webinars, articles and/or other resources
- Collaboration with another LEA
- No support needed at this time
- Other:

Certification

- I hereby certify that, to the best of my knowledge, the provided information is true and accurate.
- Any supporting documentation the LEA would like to share with OPI has been submitted in Google Form.

Authorized Representative Name and Title

Date