

Enhanced Fiscal Monitoring Analysis:

Title I Parent Involvement in Maryland School Systems

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- Office of the Inspector General (OIG) Findings for Maryland.
- MSDE's Corrective Action Plan to Address Maryland's Findings.
- Program Improvement & Family Support Responsibility: Title I Enhanced Fiscal Monitoring Protocol.
- MSDE's decision to target Title I Parent Involvement in the first year of Enhanced Fiscal Monitoring and embed it in the annual Title I Program Review in all Maryland LEAs.

How?

- Prior to the date of the LEA Program Review, the MSDE
 Title I Point-of-Contact (POC) will ask the LEA to submit
 the Title I Parent Involvement of Expenditures Reports for
 the district and specific Title I schools.
- After a review of the submitted reports, the POC will sample several items the LEA must provide Support/Background Information for each sample item to support expenditure payment.
- The POC will review for all documentation to ensure program and fiscal compliance in the areas of supplement not supplant; reasonable and necessary; and allowable and allocable.

Enhanced Fiscal Monitoring: Title I Parent Involvement Source Documents

- A-133 Compliance Supplement;
- OMB Circular A-87;
- ESEA Reauthorized Act of 2001, Section 1118;
- Title I Parent Involvement Non-Regulatory Guidance.

- Transaction Level Reports of Expenditures;
- Percentage of Funds Spent to Date;
- Approval of Spending Plans/Budgets;
- Supporting/Background Information;
- Programmatic Compliance;
- Supplement not Supplant;
- Reasonable and Necessary;
- Allowable and Allocable;
- Requisitions, Purchase Orders, & Requests for Payments; and
- Internal Controls (checks and balances).

Title I Case Study for Parent Involvement

- Spending Plan/Budget;
- Purchase Orders/Requisitions/Request for Payments; and
- Source Documents.

What did you learn from the Title I Case Study for Parent Involvement?

(A spokesperson from each of the 3 concurrent rooms will share out.)

What did the MSDE Title I Point-of Contacts learn from their Enhanced Fiscal Monitoring for Parent Involvement in their respective LEAs?

Maryland LEAs have their own unique protocols/procedures and internal controls to ensure fiscal and programmatic compliance in their payments of Title I parent involvement expenditures.

Transaction Level Reports of Expenditures

- Are not always reviewed by the Title I Office on a regular basis.
- The amount of the expenditure did not always reflect the approved budget item.
- Some payments to vendors were clearly not reasonable/necessary and not allowable.

Percentage of Funds Spent to Date

- Most schools did not begin spending money until November 2011in its FY 2012 grant.
- As of January 2012, most Title I schools spent 15% or less of their parent involvement funds which is not at a rate expected to ensure all funds are expended by June 30, 2012.
- As of January 2012, the district parent involvement funds, when applicable, spent 15% or less of their parent involvement funds which is not at a rate expected to ensure all funds are expended by June 30, 2012.

Approval of Spending Plans/Budgets

- Some LEAs provided incorrect guidance on the uses of parent involvement funds in its Title I schools.
- Non-allowable items in spending plans were approved by the Title I Office.
- Spending plans lacked detail information about purpose of activity, supplies, and materials.
- Not all Title I schools could demonstrate how parents had input on the use of its parent involvement funds. (One or two parents are not parent input.)

Supporting/Background Information

- Not all school administrators understood the requirements for the use of the Title I school's parent involvement funds.
- Not all sampled expenditures for the schools and/or district had the required supporting/background documentation, such as SANE, to support payment of expenditures.
- Title I schools did not maintain supporting/background information throughout the Title I, Part A grant period.



Programmatic Compliance

- Expenditures did not always support
 BUILDING PARENT CAPACITY.
- Some expenditures in Title I targeted assistance schools were questioned as expenditures for all parents and students in the school.

Supplement not Supplant

• Some parent involvement expenditures were questioned as supplanting, such as printing costs and transportation costs.

Reasonable and Necessary

- Providing refreshments during American Education Week.
- A high percentage of parent involvement funds was spent on food.
- Rental of Facilities, Food (Banquets), Outof-State Conference, Stipends, Gifts, etc.

Allowable and Allocable

- Entertainment (DJ, keyboard rental, amplifiers).
- Stipends (one time payment to an individual for specific duties) were questioned.
- Food.
- Large gifts and rewards.
- Expenditures for a membership driven organizations.
- Certain field trips.

Requisitions, Purchase Orders, and/or Requests for Payment

- Purchase Orders for items did not always align to the approved budget.
- Purchase Orders were approved for payment that were not allowable, reasonable and necessary, and/or supplanting.
- Request for Payment (stipend) did not provide enough details in the support/background documentation.

Internal Controls

- Varies from system to system.
- Not all Title I Coordinators signed-off on spending requests.
- If the Title I Office or another Program Dept. signed off on spending requests, the Finance/Grants Office assumes that expenditures are allowable and meets all federal programmatic and fiscal requirements.
- Not all LEAs implement internal controls to ensure full programmatic and fiscal compliance (checks and balances).

Questions and and Answers

What's Next?

MSDE will select an additional Title I area as part of its 2012-2013
Title I, Part A Program
Review Onsite Monitoring.

Enhanced Fiscal Monitoring: Title I Parent Involvement Final Thought...

Implement and adhere to specific internal controls within your LEA to ensure all expenditures meet federal programmatic and fiscal requirements because one never knows who will be looking and when....