

CFP Annual Program Review Process

The Consolidated Federal Programs (CFP) team follows a multi-tiered monitoring process that includes several components, all of which are designed to ensure that Local Educational Agencies (LEAs) meet minimum federal requirements and that students receive high-quality instruction.

CFP Application Preparation

A considerable amount of technical assistance and monitoring takes place through the State's efforts to help LEAs prepare effective CFP applications. Because of our small size and long standing relationships, school leaders feel free to call on agency staff for assistance in writing CFP applications and often avoid going down unsound or improper paths as a result of the assistance provided. Technical assistance is provided through regional grant information meetings, phone calls, emails, and on-site visits.

CFP Reviews

Each LEA CFP application undergoes a thorough review by Title program consultants, the CFP Grant Manager, School Effectiveness Coordinators, and the CFP team administrative assistant. A member of the CFP team checks each application to ensure that all required components, signatures, assurances, and such have been submitted properly. Members of the agency finance team complete a fiscal review of the applications against information they have on file about LEA carryover and audit information. Finally, Title program consultants and School Effectiveness Coordinators review the applications holistically noting any compliance issues. Follow-up calls are made to LEA CFP Team leaders, and changes are made as needed to achieve congruence between CFP applications and applicable requirements.

CFP Application Approval

CFP team members spend a considerable amount of time each year reviewing CFP applications. The approval process includes crosswalks between needs and strategies stated in applications and the results of recent and longitudinal State assessments in early reading, English language arts, and mathematics as well as information from the LEA's schools' improvement plans.

Review of Transition Reports

When districts submit reports to draw down state or federal funds, personnel in the finance division monitor spending patterns, carryovers, and field audits, as needed. These analysts Vermont Agency of Education CFP Annual Program Review Process check for discrepancies between CFP applications and actual expenditures. Discrepancies are then discussed with

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business managers, program managers, and agency consultants. These ongoing conversations often help LEAs and the state to avoid non-compliance issues.

Annual Risk Assessment on Program Management and Delivery

Starting in the FY15 grant period, the CFP team will conduct an annual risk assessment every September that will provide the information needed to target available administrative resources on factors that pose the greatest risk to the integrity of the CFP programs. The CFP team will rate each LEA against multiple risk factors and indicators, record the risk level for each LEA, and rank them from highest to lowest risk.

Risk factors may include:

Risk Factor	Indicator
Fiscal	<ul style="list-style-type: none"> • Amount of award • Past history of high level of carryover
School Improvement	<ul style="list-style-type: none"> • Number of identified schools and level of identification
Grants Management	<ul style="list-style-type: none"> • CFP Team Leader and other key staff turnover • Number of application submissions before approval
Past Monitoring and/or Auditing	<ul style="list-style-type: none"> • Number and nature of past programmatic and fiscal monitoring or audit findings • Date and scope of previous monitoring
Special Circumstances	<ul style="list-style-type: none"> • Number of independent schools • Local N or D sites • McKinney Vento grantee

Formal Program Monitoring

Comprehensive On-Site Program Reviews

The CFP team performs comprehensive on-site program reviews of at least three LEAs per year. The selected LEAs are identified through the annual risk assessment as posing the highest risk of not being in compliance. The process is not intended to be an exhaustive review or to ensure compliance with each and every legal requirement. Rather, it is designed to verify compliance with major items of the law as well as to assist the LEA in improving student outcomes using federal dollars. Areas of the comprehensive program review include, but are not limited to:

- Needs assessment
- LEA administrative responsibilities
- Highly Qualified Teachers and Paraprofessionals
- Services to independent schools
- Services to homeless students
- Requirements for school improvement
- Parental involvement
- Schoolwide schools
- Targeted Assistance schools
- Evaluation of program investments
- Fiduciary requirements

Focused Reviews

The CFP team will review application data, email requests from LEAs, issues identified by the agency’s Federal Fiscal monitoring team, and issues identified from past programmatic reviews to identify key single issues. The CFP team will decide each September what issues will be reviewed and in what manner the review will take place – on-site or desk audit. The team will choose a minimum of two issues each year and a minimum of ten LEAs for focused reviews. Single issues may include:

- Review of schoolwide plans
- Early childhood programs
- Evaluation of effectiveness
- Independent school equitable services
- Services for homeless students
- Professional learning

Single Audit Act Reviews

Private audit firms are contracted by the LEAs to conduct audits in all LEAs and schools that expend more than \$500,000 (and in the future, it will be raised to \$750,000) in state or federal funds, including lunch program commodities. The agency’s audit managers maintain an extensive database of audit information and review the outcomes of these audits. When audit findings are made, the information is forwarded to the appropriate program consultants and coordinators for follow-up.

Annual Technical Assistance Events

The CFP team plans and implements at least two technical assistance events per year:

- The CFP 101 fall training is for new LEA CFP team leaders. It focuses on the basic information they will need to complete the grant application and run a successful program.
- The CFP Annual Spring Conference is for all LEA CFP team leaders. It focuses on topics found to be the most in need of attention through the needs assessment and day-to-day program administration.