



Maryland State Department of Education
Title IV, Part A: Student Support and Academic Enrichment Grants
Monitoring and Guidance Protocol

Part 1 – Monitoring Guidance

The Maryland State Department of Education (MSDE) is federally required to monitor the Title IV, Part A Student Support and Academic Enrichment Grant under §4104(b)(1) of the Elementary and Secondary Education Act (ESEA) of 1965 as reauthorized by the Every Student Succeeds Act of 2015 and §200.331 of the Code of Federal Regulations (CFR). Under §200.331 of the CFR, the MSDE is responsible for monitoring the activities of each local school system (LSS) as necessary to ensure that the provided sub-award is used for authorized purposes in compliance with Federal statutes, regulations, and the terms and conditions of the sub-award, and that sub-award performance goals are achieved. The MSDE monitoring of the LSS *must* include:

- ✓ Reviewing financial and programmatic reports required by the MSDE.
- ✓ Following-up and ensuring that the LSS takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the LSS by the MSDE detected through audits, on-site reviews, and other means.
- ✓ Issuing a management decision for audit findings pertaining to the Federal award provided to the LSS by the MSDE as required by §200.521 of the CFR - Management decision.

For more information, please visit [2 CFR § 200.331 - Requirements for Pass-Through Entities](https://www.law.cornell.edu/cfr/text/2/200.331) at <https://www.law.cornell.edu/cfr/text/2/200.331>

Additional monitoring requirements from the MSDE *may* include:

- ✓ Verifying that every LSS is audited as required by Subpart F of the CFR – Audit Requirements when it is expected that the LSS Federal award expended during the respective fiscal year equaled or exceeded the threshold of \$750,000 set forth in §200.501 Audit requirements.
- ✓ Considering whether the results of the LSS audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to MSDE’s own records.
- ✓ Considering taking enforcement action against a non-compliant LSS as described in §200.338 of the CFR - Remedies for non-compliance of this part and in program regulations.

For more information, please visit [2 CFR § 200.331 - Requirements for Pass-Through Entities](https://www.law.cornell.edu/cfr/text/2/200.331) at <https://www.law.cornell.edu/cfr/text/2/200.331>

Depending upon the MSDE’s assessment of risk posed by the LSS, the following monitoring tools *may* be utilized by the MSDE to ensure proper accountability and compliance with program requirements and achievement of performance goals:

- ✓ Providing the LSS with training and technical assistance on program-related matters.
- ✓ Performing on-site reviews of the sub-recipient’s program operations.
- ✓ Arranging for agreed-upon procedures and engagements as described in §200.425 of the CFR - Audit services.



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Part 2 – Monitoring Protocol

In alignment with the provided monitoring guidance outlined in Part 1, the following is a step-by-step plan detailing the manner in which the MSDE will provide monitoring services to the LSS.

Step 1 – Notification

- The LSS will be notified in a timely manner regarding an official act of monitoring, e.g., audit, on-site review, and/or other means.
- Notification of monitoring events may occur either electronically, via phone, and/or in writing.

Step 2 – Planning

- Planning and preparation for monitoring events will depend upon the type of monitoring activity selected. *For example, on-site reviews will require more extensive planning and preparation than a desk audit.*
- An initial phone conference will be scheduled for a mutually agreed-upon date and time in order to identify the type of monitoring event, a date and time for the event, an agenda, and any required documents.

Step 3 – Documents

- The MSDE On-Site Monitoring Evaluation Form will be required for any on-site monitoring review. Additional LSS evidence requested on the On-Site Monitoring Evaluation form may be submitted with the form or made available during the visit. These documents must be submitted a week prior to the scheduled visit.

Step 4 – Format

- Monitoring formats consist of but are not limited to on-site visits, field visits to observe a related Title IV-A activity, or a phone/video desk audit.
- The specific format selected for the monitoring event will be discussed and agreed upon prior to the monitoring event.

Step 5 – Reporting

- Following an on-site review, a formal cover letter and updated On-Site Monitoring Evaluation Form detailing an overall grant summary, recommendations, and commendations will be mailed and electronically sent to the LSS within two weeks of the visit.

Step 6 – Findings

- If the On-Site Monitoring Evaluation Form suggests or identifies areas for further attention, follow-up conferences will be scheduled to discuss progress made towards suggestions and overall grant outcomes and objectives. Follow-up will be provided until all recommendations are fulfilled.