



MONITORING AND COMPLIANCE *ALIGNING BUDGETS WITH PROGRAM REALITIES*

Overview

Session Description

In this session, participants will discuss the budgeting discrepancies they have found while monitoring. Participants will then work in groups organized by the most common budget misalignment issues (see below) to consider how to identify, address, and prevent the issues in the future. Participants will examine their current monitoring tools and procedures to determine how they might be revised or how to develop new practices, a tool, or template. To close the session, each small group will share the types of revisions or new tools/practices they discussed and consider next steps.

Main Issues NDTAC Has Heard

1. What subgrantees say they will do in their budget/application does not always align with what they are doing in practice or with the Title I, Part D, requirements.
 - a. Subgrantees said they would meet a requirement, but have failed to do so (e.g., meet supplement/not supplant, transition reservation, administration expense limit, fiscal maintenance of effort requirements).
 - b. Subgrantees said they would provide a service, but aren't providing it.
2. SEA monitors do not always know what documents to review, who and what to observe, or what to ask (e.g., how to confirm appropriate usage of purchased equipment).

Session Agenda

- A. Introducing: The importance of effective monitoring tools and practices to assure aligned budgets (5 minutes)
- B. Thinking: Individual State and local facility-specific issues and challenges (10 minutes)
- C. Pairing: Small group discussion and activity by issue type (40 minutes)
- D. Sharing: Report out on small group discussions and activities (15 minutes)

- E. Reflecting: Consider session takeaways and complete session feedback form (5 minutes)

Related NDTAC Resources

- *A Guide to Meeting Compliance Requirements for the Title I, Part D, Program* (http://www.neglected-delinquent.org/nd/docs/monitoring_guide_20091111.pdf)
- *Title I, Part D, Program Administration Planning Toolkit* (<http://www.neglected-delinquent.org/nd/docs/programAdminPlanningToolkit.pdf>)
- Relevant sections of statute: Sec. 1004 (<http://www.ed.gov/policy/elsec/leg/esea02/pg1.html#sec1004>); 1414(c)(7) (<http://www.neglected-delinquent.org/nd/resources/legislate/intro.asp#sec1414>); 1415(b) (<http://www.neglected-delinquent.org/nd/resources/legislate/intro.asp#sec1415>); 1418 (<http://www.neglected-delinquent.org/nd/resources/legislate/intro.asp#sec1418>)
- Relevant sections in ED's *Nonregulatory Guidance*: C-1 thru C-2 (http://www.neglected-delinquent.org/nd/resources/guidance/state.asp#sa_carryover), F-1 (http://www.neglected-delinquent.org/nd/resources/guidance/state.asp#sa_plan), K-1 thru K-5 (http://www.neglected-delinquent.org/nd/resources/guidance/state.asp#sa_transition)
- Relevant sections of *Nonregulatory Guidance on Title I Fiscal Issues* (<http://www.ed.gov/programs/titleiparta/fiscalguid.pdf>): Maintenance of Effort (page 15), Supplement/Not Supplant (page 37), Carry Over (page 42)
- Relevant sections of EDGAR: Part 80, Subpart C (<http://www.ed.gov/policy/fund/reg/edgarReg/edgar.pdf>) (Post-Award Requirements)
- Relevant OMB Circulars: Circular A-87 (http://www.whitehouse.gov/omb/circulars_a087_2004/) (Cost Principles) and Circular A-133 (http://www.whitehouse.gov/omb/circulars_a133/) (Audits)