



Perkins V Monitoring Process



2020-2025

Wyoming Department of Education

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INTRODUCTION

The Wyoming Department of Education (WDE) is required to monitor subrecipients of federal funds for the purposes of compliance with ESEA and the Carl D. Perkins V: Strengthening Career and Technical Education for the 21st Century Act, program improvement and financial review under 2 CFR Part 200, the Education Department General Administrative Regulations (EDGAR), and other applicable grant regulations. This document describes the monitoring process for Wyoming subrecipients of the Consolidated Grant and Perkins Grant.

SELECTION OF SUBRECIPIENTS TO BE MONITORED

Subrecipients are required to complete a Programmatic and Fiscal Desk Audit for their Consolidated Grant (CG) and Perkins V funds on a four-year rotating cycle. In addition to the four-year rotation, the WDE is required to “evaluate each subrecipient’s risk of noncompliance with Federal statutes, regulations and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring (EDGAR 2 CFR Part 200.331(a)(6)(b)(1-4)).” In a given year, up to 17 and no less than 12 Districts may be monitored for the previous year’s grants. No less than two Community Colleges may be monitored. The selection of subrecipients to be monitored will be based on a combination of the four-year rotating cycle and the results of the risk evaluation process conducted by WDE federal program staff. For more information on the risk evaluation process, Districts may reference the Consolidated Grant Risk Assessment Tool ([Attachment A](#)), and Community Colleges may reference the Perkins V Post-Secondary Risk Assessment Tool ([Attachment B](#)).

DESK AUDIT TIMELINE AND PROCESS

The WDE Monitoring Timeline Monitoring Timeline provides more detail on timeframes for document submission, review, WDE response, and on-site monitoring, and can be referenced in [Attachment C](#). In general, subrecipients will be notified of their selection for Desk Audits in the spring of the year preceding the monitoring year. For example, if the subrecipient is scheduled for monitoring in the 22–23 program year, they will be notified in the spring of 2022. The initial documentation subrecipients are required to submit in response to the Desk Audit (see WDE CG/Perkins Desk Audit Review Form, and WDE Post-secondary Audit Review Form [Attachment D](#)) will be submitted to the WDE. Subrecipients are expected to provide documentation, in electronic format, for all highlighted sections in the Desk Audit Review Form, which is provided to subrecipients upon initial notification of monitoring. The documentation submitted is then reviewed by each WDE Perkins V Program Manager to determine risk, turnover in staff, and additional indicators that relate to each specific program. Perkins V Program Managers will then record the compliance status for each indicator on the Desk Audit Review Form.

If clarification or further documentation is needed, the subrecipient will be notified by the Perkins V Program Manager and will have an opportunity to provide additional documentation. This process will be ongoing until the completion of the desk audit (see WDE Monitoring Flow Chart, [Attachment E](#)). Notes are made by Perkins V Program Managers throughout the monitoring process, saved electronically for process.

FOLLOW UP TO INITIAL DESK AUDIT

Following the desk audit review, all WDE Program Managers associated with the Consolidated Grant and Perkins V meet as a group to discuss the documentation that was submitted. As a group, a determination is made as to which subrecipients should be scheduled for an on-site follow-up visit for a more in depth review of Desk Audit indicators. Reasons for an on-site follow-up may include, but are not limited to, missing or incomplete documentation, significant past compliance issues, fiscal or programmatic concerns, reporting errors, failure to submit the CG/Perkins Applications on time, new staff and/or the need for fiscal or programmatic technical assistance, or other fiscal or programmatic issues respective to each Program Manager's notations.

Once the determination is made regarding an on-site visit, the subrecipient is notified of the need for an on-site visit, further actions required, or that the monitoring is closed out.

No On-site Required

See monitoring results section.

ON-SITE VISITS

If the subrecipient is notified of the need for an on-site visit, dates will be discussed and set-up so that both the subrecipient and the WDE can plan for the upcoming on-site follow-up visit. Dates of the visits are set for the spring semester.

Teams of Programs Managers then visit the selected subrecipients and further review subrecipient documentation and programs. The on-site visit will begin with an introductory meeting with all key personnel. Following the initial meeting, program managers will review requested documentation and seek further clarification when needed. Perkins V Managers may request a physical review of CTE facilities and equipment. Finally, an exit interview is conducted with key personnel to discuss initial results of the onsite monitoring.

MONITORING RESULTS

The results of the review are communicated in the following categories:

- Commendations - areas in which the subrecipient demonstrated an outstanding effort, if applicable;
- Further Actions Required - areas in which the subrecipient is required to produce follow-up evidence in order to be in compliance with ESEA/Perkins V;
- Recommendations - areas in which the subrecipient has met the ESEA/Perkins V requirements for compliance, but could be improved.

If no on-site visit is required, the Consolidated Grant Manager (or Perkins V Program Manager for Community Colleges) will send a Monitoring Results Letter by the end of January. If an on-site is required, within thirty (30) business days after the visit is completed, the subrecipient is sent a Monitoring Results Letter. This letter details the findings of the visit and explains what further steps, if any, the subrecipient must take.

If there are further actions required of the subrecipient, the subrecipient must submit a Corrective Action Plan with the actions it will take to bring the indicators into compliance. Upon receipt of the Monitoring Results Letter, the subrecipient has forty-five (45) business days to complete and submit to the WDE Consolidated Grant Manager (or Perkins V Program Manager for Community Colleges) a completed Corrective Action Plan. This plan is reviewed by the WDE Perkins V Program Manager responsible for the program in which the non-compliance issue occurred. That Program Manager contacts the subrecipient regarding the completion of the Corrective Action Plan. When the program manager has documentation that indicates the subrecipient is in compliance, he/she communicates to the Consolidated Grant Manager that the subrecipient has completed its corrective action(s), and the subrecipient then receives a Corrective Action Completion Notification stating that it is no longer in Corrective Action Status.

The WDE will not approve the subrecipient's Consolidated Grant and/or Perkins V application(s) until the subrecipient's Corrective Action Plans are approved. This process will apply annually to all monitored subrecipients for their Consolidated/Perkins V Grant(s). In addition, individual program managers may determine if it is necessary to hold monthly request(s) for funds of a particular federal program based on the subrecipient's Desk Audit, the results of the on-site visits, and progress on the Corrective Action Plan.

All documents and activities for each grant monitoring cycle are stored and tracked electronically in a drive shared by all program managers responsible for the monitored programs. The School Support Division also uses a tracking spreadsheet in order to track completion of each requirement and adherence to the expected timelines.