



Wyoming Department of Education

Special Education Fiscal Monitoring Manual

Table of Contents

Purpose and Authority.....	1
WDE Fiscal Monitoring System	2
Universal Monitoring Activities.....	2
Targeted Cyclical Monitoring	3
Desk Audit.....	3
Interview and Additional Information Request.....	4
Intensive Risk-Based Monitoring	4
Annual Risk Assessment	4
Onsite Monitoring	5
Preparation for Virtual and Onsite Monitoring.....	6
Monitoring Report and Findings of Noncompliance	7
Monitoring Report.....	7
Corrective Action Plan.....	7
Types of Noncompliance.....	8
Resolution and Monitoring Closeout	8
Consequences of Noncompliance and Enforcement Mechanisms	10
Disallowance of Cost and Recovery Process	10
Suspension or Termination of Federal Award	11
WDE Fiscal Monitoring Timeline.....	13
Tools and Templates	15
A: WDE IDEA Fiscal Monitoring Protocols Tool.....	15
B: Fiscal Monitoring Report for BHD Template.....	31
C: Fiscal Monitoring Closeout Letter for BHD Template.....	32
D: Single Audit Finding Letter.....	33

Purpose and Authority

The Wyoming Department of Education (WDE) is the prime recipient of Individuals of Disabilities Education Act (IDEA) Part B Federal grants and is responsible for monitoring the programmatic and financial activities of its local educational agencies (LEAs) receiving IDEA Part B federal grants to ensure proper stewardship of funds received from the United States Department of Education (U.S. ED). As a pass-through entity, the WDE is statutorily required to monitor the activities of subrecipients as necessary to ensure that grants are used for authorized purposes and in compliance with federal statutes, regulations, and the terms and conditions of the subaward.

This manual contains the standards for fiscal monitoring and oversight. These procedures are developed to standardize oversight, evaluation, and monitoring guidelines for LEAs. The following are federal regulatory provisions under which the WDE monitors for fiscal accountability and compliance:

- 34 CFR Parts [75](#), [76](#), and [77](#) — Education Department General Administrative Regulations (EDGAR)
- [2 CFR Part 200 — Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)
- [2 CFR Part 180 — OMB \[Office of Management and Budget\] Guidelines to Agencies on Governmentwide Debarment and Suspension \(Non-procurement\)](#)
- [34 CFR Part 300 — Assistance to States for the Education of Children with Disabilities](#)

This document sets forth the policies and procedures for each component of the WDE plan for fiscal monitoring of its grant recipients for **IDEA Part B funds**.

The OMB's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, commonly known as the Uniform Grant Guidance, and other applicable regulations establish fiscal requirements for nonfederal agencies that are recipients of federal funds.

WDE Fiscal Monitoring System

WDE uses a fiscal monitoring system integrated with the federal program monitoring. Under the current system, WDE uses multi-grant indicators applicable to all programs for both fiscal and programmatic monitoring. The Every Student Succeeds Act (ESSA) grant team supervisor is responsible for all the targeted and intensive monitoring activities.

The special education fiscal monitoring system uses some components of the monitoring activities conducted with other programs as well as program-specific monitoring activities.

WDE has a risk-based fiscal compliance and accountability system to ensure compliant LEA procedures and practices and the allowable use of federal education statutory and discretionary grant funds. The system includes three differentiated levels:

1. Universal monitoring
2. Targeted cyclical monitoring
3. Intensive risk-based monitoring

A fiscal monitoring review is not meant to be considered a Single Audit. Both onsite and desk reviews follow similar procedures, in which WDE assesses the capability, performance, and compliance of the LEA against applicable administrative regulations and grant requirements.

Universal Monitoring Activities

As the prime recipient of IDEA Part B federal grants, WDE is responsible for monitoring the activities of its subrecipients to ensure the subaward is used for authorized purposes and is in compliance with federal and state statutes, regulations, and the terms and conditions of the grant, pursuant to 2 CFR §200.332. Annually, the WDE senior fiscal analyst, in collaboration with other state education agency (SEA) staff, performs a series of activities that are applicable to all LEAs as part of the universal monitoring activities. The following is a list of monitoring activities that are performed annually and serve as the first line of oversight of all grant recipients:

- review of LEA's IDEA Part B Consolidated Grant Application and required assurances under [34 CFR §300.200](#) submitted in the Grants Management System (GMS) demonstrating eligibility for IDEA Part B grant awards
- annual budget review
- quarterly submission of Periodic Expenditure Reports (PERs) for review
- quarterly submission of IDEA reimbursement requests for review
- annual submission (March 30) of IDEA expenditure reports with PER for review
- annual review of 401 expenditure reports with maintenance of effort (MOE) compliance data

- monitoring of excess cost requirements
- monitoring of timely obligation of funds
- annual risk assessment
- review of Single Audit reports
- budget modification process with thresholds requiring WDE's approval
- annual training provided to LEAs on IDEA federal and state fiscal compliance requirements

For more details, see the Allowable Use of Funds, LEA Subgrants Application, Excess Cost, and LEA MOE manuals.

Targeted Cyclical Monitoring

WDE conducts targeted cyclical fiscal monitoring on a 4-year cycle. There are 48 LEAs and one Intermediate Educational Unit (IEU)–Behavior Health Division (BHD) in the state of Wyoming. So, with the current cycle, approximately 12 LEAs are selected annually for targeted cyclical monitoring. Targeted cyclical monitoring ensures that WDE monitors each LEA at least once every 4 years according to a set schedule. The targeted monitoring cycle is conducted in collaboration with the other federal programs. The senior fiscal analyst for special education is responsible for the monitoring of the IDEA-specific requirements using the monitoring protocols for IDEA (see Tools and Templates).

Desk Audit

Targeted monitoring starts with a desk audit. The purpose of a desk audit is to ensure that each LEA has internal controls in place to ensure schools are compliant with federal and state statutes. The desk audit includes a WDE review of files submitted by the LEA, including but not limited to the following:

- budget or expenditure reports
- time and effort documentation
- documentation related to program-specific areas (where applicable)
- written, board-approved fiscal policies and procedures
- additional fiscal data submitted requested by WDE
- grant award letters, contracts, files, documents, and related correspondence
- audit reports (as necessary)

Interview and Additional Information Request

Targeted cyclical monitoring may also include follow-up interviews, onsite visits, or requests for additional information based on the initial review related to any policies, procedures, or practices that are found to be inconsistent with federal regulations.

Cyclical monitoring occurs each year from November through January. Each LEA cohort is notified between May and August of the upcoming desk audit. By June of each year, the ESSA grant team supervisor at WDE holds a training for LEAs selected for targeted cyclical monitoring. Each LEA is required to submit requested documentation to WDE by November for its scheduled desk audit.

For more details about the integrated monitoring with ESSA programs, please refer to the [Federal Programs Guidance](#) and [Consolidated Grant Monitoring Requirements](#) for all programs.

Intensive Risk-Based Monitoring

Annual Risk Assessment

There are 48 districts that are reviewed once every 4 years. In addition to the 4-year cycle, the WDE selects up to five additional LEAs for intensive monitoring based on annual risk factors. This selection occurs every year. Note the following:

- A district may be selected for 2 or more years in a row.
- A district may be identified based on risk during its cycle year.

Therefore, there can be up to 17 LEAs that are monitored annually. The most noticeably frequent risk factors are timely expenditure of funds and unspent funds applicable to all LEAs. One risk factor is IDEA-related. The special education team provides Result Driven Accountability (RDA) determination using compliance- and outcome-based data from the programmatic monitoring to the ESSA monitoring team that completes the risk assessment.

The WDE follows the process outlined below:

1. WDE ESSA grant team supervisor, with the team, completes an annual risk assessment for all LEAs, including subrecipients of IDEA Part B § 611 and § 619 funds, to determine their potential risk of noncompliance in August.
2. Each selected LEA will receive a notification letter in September prior to the review with an overview of the monitoring protocols and request for document submission at least 45 days prior to the monitoring review.
3. LEAs selected for intensive monitoring are informed of their type of review via email and are invited to attend a training in June at the STAR Conference. The training provided is for LEA staff managing grants.
4. WDE reviewers initially conduct a virtual desk audit in December and January to inform the focus of the intensive risk-based monitoring for each LEA.

If an LEA is selected for intensive risk-based monitoring for 2 or 3 subsequent years, the WDE ESSA grant team supervisor will determine, based on the status of the LEA's previous monitoring, whether additional onsite monitoring is necessary. If it is determined that additional monitoring is not necessary because WDE reviewers did not identify noncompliance during the previous monitoring review, the LEA will be notified of the decision.

All reviews are done electronically; however, an onsite review may be required after program managers assess business needs for technical assistance (TA) and training. The monitoring protocols have indicators from each program with details of the fiscal indicators.

All monitoring protocols are published and available on WDE's website via the following links: [Federal Programs Guidance](#) and [Consolidated Grant Monitoring Requirements](#).

Onsite Monitoring

WDE reviewers initially conduct a virtual desk audit in December and January to inform the focus of the onsite intensive risk-based monitoring for each LEA. Onsite visits may be conducted later. Onsite monitoring consists of, but is not limited to, the following:

- Entrance meeting — the WDE team provides a description of the scope and purpose of the monitoring, requests additional information from the LEA, and verifies that information required to complete the monitoring visit is available at the site.
- Interviews — the senior fiscal analyst interviews staff involved with IDEA Part B grant activity (specifically business managers and special education directors). The interview focuses on unresolved issues or questions that result from the preliminary review of documents submitted.
- Detailed document review — the senior fiscal analyst conducts a detailed review of the following:
 - fiscal records for compliance with IDEA Part B §§ 611 and 619 requirements, generally accepted accounting principles, and internal control best practices
 - pay records (timecards/sheets) and attendance reports to ensure compliance with time and effort requirements
 - staffing levels, operating procedures, and contracts
 - employment contracts/agreements between LEAs and personnel paid with IDEA Part B funds to ensure that services to students with disabilities are being provided and payments are appropriate; contracts shall be reviewed for dates, authorized signatures, amounts paid, and supporting documents to justify payment
 - subrecipient records of IDEA Part B fund expenditures and supporting documents
 - written, board-approved fiscal policies and procedures

- procurement procedures and practices
- financial management procedures and practices
- record-keeping procedures and practices
- property control records
- Verification of practice — the WDE team may visit schools and classrooms to verify purchases and allowable costs, including the review of personnel and verification of time and effort reporting.
- Exit interview — the WDE team holds an exit interview with the appropriate LEA staff when the monitoring visit is completed. Problem areas will be discussed in general terms.

Preparation for Virtual and Onsite Monitoring

Each year in June, WDE holds a monitoring training for LEAs. LEAs selected for cyclical monitoring are strongly encouraged to attend the training to understand the process and expectations. Additionally, the WDE provides each LEA with the intensive monitoring protocol, which includes a list of requested documentation and testing procedures, to prepare for onsite monitoring.

Monitoring Report and Findings of Noncompliance

Monitoring Report

The ESSA grant team supervisor and the team of reviewers complete a monitoring report within 30 days of the completion of the desk or onsite review. The report will state the objectives, scope, and methodology of the monitoring and will clearly state findings, recommendations, and whether and on what timeline corrective action is required. Findings will contain a statement of criteria (e.g., regulation, directive, contract clause), the condition found or reason for the finding of noncompliance and required corrective actions and evidence for verification of correction. Each finding of noncompliance must be corrected in a timely manner and in no case later than 1 year from the date of the monitoring report. Depending on the extent of noncompliance, LEAs may be required to submit a detailed corrective action plan within 45 days of the notification with specific steps to be taken to resolve noncompliance and an associated timeline. If the review of risk reveals material weaknesses in internal controls, an improvement plan will be developed.

Corrective Action Plan

If an LEA receives a report with monitoring findings, the finding of noncompliance must be addressed within 45 days and resolved within 1 year. When the LEA has corrected noncompliance issues, the lead reviewer sends a notification that the noncompliance issues have been successfully remediated. An LEA that successfully remediates a noncompliance issue could be removed from the high- or medium-risk categories resulting from the annual risk assessment. Failure to address the findings within 90 days could lead the WDE to use enforcement mechanisms as outlined in [2 CFR §200.339](#), such as required technical assistance with the recommended corrective action plan, additional restrictions on the grant, the freezing of federal funding, or the withholding of funds in whole or in part.

In addition to the desk or onsite fiscal monitoring review, WDE may identify an LEA as noncompliant

- based on findings from an external audit, or
- because of concerns identified through other means.

Once identified, the LEA will receive notification of the requirement to complete a corrective action plan. The corrective action plan describes the following:

- the areas of noncompliance
- the required corrective action(s)
- any enforcement actions

Corrective actions can be imposed by the WDE when subrecipients of federal grants fail to comply with the terms and conditions of federal grant programs. The purpose of the corrective action is to ensure that the subrecipient corrects the finding of noncompliance.

To complete a corrective action, the LEA must demonstrate that it has corrected the issue that caused the noncompliance. The LEA must do so by

- providing specific documentation that supports the completion of the corrective action by the date specified, or
- submitting the required documentation in the GMS system indicated on the corrective action notification.

If there are questions about the corrective action, the LEA may call the WDE phone number indicated on the corrective action notification.

The senior fiscal analyst will use the Consolidated Grant Application monitoring spreadsheet to track the corrective actions and technical assistance for each LEA. The senior fiscal analyst will provide differentiated technical assistance to the LEA to address needs identified during monitoring activities.

Types of Noncompliance

Types of noncompliance may include, but are not limited to, the following:

- expenditure of funds or conducting activities that are not in accordance with the IDEA authorizing statute, regulations, guidelines, or approved application
- failure to account for funds in accordance with the WDE financial management [standards](#) or Administrative [Rules](#)
- findings in a Single Audit conducted by an independent auditor
- failure to comply with
 - programmatic or fiscal reporting requirements;
 - Coordinated Early Intervening Services (CEIS) reporting;
 - parentally-placed private school proportionate share reporting; and/or
 - previous required corrective actions, refund requests, or special conditions

Resolution and Monitoring Closeout

The WDE considers all findings of noncompliance as resolved only after the LEA has provided sufficient evidence that the corrective action plan is fully implemented. If all other non-IDEA-related findings are resolved, at this point, a closeout letter is issued by the ESSA grant team

supervisor to the LEA within 30 days of the submission of the final satisfactory evidence indicating that all required actions have been resolved.

Consequences of Noncompliance and Enforcement Mechanisms

The WDE may take enforcement actions as part of a corrective action or for noncompliance with a previous corrective action. The Uniform Grant Guidance, [2 CFR § 200.339](#), authorizes the WDE to use enforcement mechanisms that may include but are not limited to the following:

- temporarily withhold cash payments pending correction of the deficiency or more severe enforcement action
- disallow all or part of the cost of the activity or action not in compliance
- wholly or partly suspend or terminate the federal award
- initiate suspension or debarment proceedings
- withhold further federal awards for the grant
- take other remedies that may be legally available

WDE may deny a grant application for federal funding as an enforcement action.

Disallowance of Cost and Recovery Process

A cost that has been disallowed as a result of fiscal monitoring or a Single Audit may be subject to recovery. Under General Education Provisions Act (GEPA) regulations, [34 CFR § 81.30](#), the WDE may require an LEA to return funds that have been disallowed to the WDE if

- the LEA made an unallowable expenditure of IDEA funds; or
- the LEA otherwise failed to discharge its obligation to account properly for its IDEA Part B federal grant.

This decision may be based on an audit report, an investigative report, a monitoring report, or any other evidence.

Under GEPA regulations, [34 CFR § 81.32](#), an LEA that made an unallowable expenditure or otherwise failed to account properly for funds shall return an amount that is proportional to the extent of the harm its violation caused to an identifiable federal interest associated with the program. The regulations' definition of an identifiable federal interest includes, but is not limited to, the following criteria:

- serving only eligible beneficiaries
- providing only authorized services or benefits

- complying with expenditure requirements and conditions, such as set-aside, excess cost, maintenance of effort, comparability, supplement-not-supplant, and matching requirements
- preserving the integrity of planning, application, record-keeping, and reporting requirements
- maintaining accountability for the use of funds

The WDE process of recovery of funds must include the following:

- notice of disallowance through a monitoring report with a finding of noncompliance
- a WDE determination letter based on audit findings per [34 CFR § 81.34](#)
- an application for review of a disallowance per [34 CFR § 81.37](#)
- a final decision per [34 CFR § 81.44](#)
- collection of disallowed cost per [34 CFR § 81.45](#)

The WDE's attorney from the Attorney General's Office may be called in for counsel depending on issues detected during the review of noncompliance prior to enforcement action being imposed. The LEA can make adjustments within the financial management system for costs that have been determined to be unallowable as a result of the review or audit. The LEA must send a check to the WDE for the amount that was determined unallowable for a grant period that has closed.

Suspension or Termination of Federal Award

IDEA Part B federal awards may be terminated in whole or in part, by the WDE, as follows, per [2 CFR § 200.340](#):

- if an LEA fails to comply with the terms and conditions of a federal award
- if an award no longer effectuates the program goals or agency priorities
- with consent of the LEA
- by the LEA upon sending written notification including reasons for termination
- pursuant to termination provisions included in the federal award

The WDE should clearly specify termination provisions applicable to IDEA Part B federal grants. When terminating a federal award prior to the end of the period of performance due to material failure to comply with the federal award terms and conditions, the WDE must report the termination to the OMB-designated integrity and performance system accessible through [SAM.gov \(currently FAPIIS.gov\)](#). The termination of a federal award should not be reported into the designated integrity and performance system until the LEA entity either

- has exhausted its opportunities to object or challenge the decision, see [2 CFR § 200.342](#); or
- has not, within 30 calendar days after being notified of the termination, informed the WDE that it intends to appeal the decision to terminate.

After entering information into the designated integrity and performance system about a termination,

- if the WDE subsequently learns that any of that information is erroneous, the WDE must correct the information in the system within three business days; and
- if the WDE subsequently obtains an update to that information that could be helpful to other federal awarding agencies, the WDE should amend the information in the system to incorporate the update in a timely way.

When posting or reposting any information that will be made publicly available, the WDE must act in accordance with the Freedom of Information Act. When a federal award is terminated or partially terminated, both the federal awarding agency or pass-through entity and the nonfederal entity remain responsible for compliance with the closeout requirements in 2 CFR [§ 200.344](#) and [§ 200.345](#).

WDE Fiscal Monitoring Timeline

There are six milestones in the monitoring process:

- LEA uses compliance protocol
- LEA selected for monitoring
- LEA training
- LEA submits evidence/documents
- SEA reviews documents
- LEA findings/corrective actions
- SEA closure of cycle

The timelines of different activities are as follows:

Table 1. Timeline of Activities

Activity	Date	Responsible Staff
Notification of LEA selection for monitoring	September	ESSA grant team supervisor
Annual Risk Assessment	September	ESSA grant team supervisor
LEA Monitoring Training	June	ESSA grant team supervisor
Submission of documents for reviews	November 1	LEA staff
WDE desk reviews	December and January	ESSA grant team supervisor / WDE senior fiscal analyst
Monitoring report with findings and recommendations	February	ESSA grant team supervisor / WDE senior fiscal analyst
Submission of corrective action plan (via GMS monitoring tool)	45 business days after notification of finding	LEA staff

WDE Special Education Fiscal Monitoring Manual

Activity	Date	Responsible Staff
Corrective action plan implementation	Within 1 year of notification of finding	LEA staff
Closeout letter	Within 30 days of LEA submission of final evidence	ESSA grant team supervisor / WDE senior fiscal analyst

Tools and Templates

A: WDE IDEA Fiscal Monitoring Protocols Tool

WDE Special Education Fiscal Monitoring Protocols

LEA:	LEA Contact:
Date(s) of Monitoring Visit:	WDE Reviewer(s):

PURPOSE

As a requirement of the Office of Management and Budget's Uniform Grant Guidance and other federal law and regulations, fiscal monitoring is conducted by the Wyoming Department of Education (WDE) to ensure that local educational agencies (LEAs) that are recipients of Individuals with Disabilities Education Act (IDEA) Part B federal grants comply with federal, state, and local laws and regulations.

Monitoring activities include

- assessing and measuring LEA compliance with grant rules and regulations,
- ensuring grant funds are used for authorized purposes in compliance with laws and regulations,
- assessing organization internal controls to ensure reliable financial reporting and accountability, and

- identifying areas of noncompliance and recommended areas of improvement to improve administrative efficiencies and programmatic effectiveness.

This checklist is a tool to monitor and evaluate an LEA's implementation of the IDEA Part B programs to ensure compliance and/or effectiveness. This is determined based on evidence gathered by reviewers through the review of documentation and LEA staff interviews. Each section contains several monitoring questions that will be evaluated individually.

The suggested documentation list contains examples of documentation (by question) that may be requested for all open grant periods. Please note that in some cases, all items may not be required.

Section A: EDGAR and Uniform Grant Guidance Requirements

Compliance Requirement	Evidence (Suggested Documentation)	Compliance Rating: C = Compliant NC = Noncompliant N/A = Not Applicable	Comments/Preliminary Finding — If Applicable
Section A-I. Written Fiscal Policies and Procedures			
1. Does the LEA have written policies and procedures in compliance with the Uniform Grant Guidance? <ul style="list-style-type: none"> Cost principles, 2 CFR §200, Subpart E <u>Testing:</u> Verify written procedures to determine allowability of costs. Procurement, 2 CFR § 200.318 <u>Testing:</u> Verify written procedures for micro, small, and large purchase processes. Look for competitive 	Written fiscal policies and procedures		

<p>bidding processes and suspension and debarment verification processes.</p> <ul style="list-style-type: none"> Time and effort, 2 CFR §§ 200.430, 403(a) Testing: Verify written procedures for personnel activity reports (PARs) and semiannual certifications. Inventory management, 2 CFR §200.313 Testing: Verify written procedures to track inventory at least biannually. Cash management 2 CFR §200.305 Testing: Verify written procedures for liquidation of obligated expenditures and a process for requesting reimbursement. Conflict-of-interest policy, 2 CFR §§ 200.319(c), 200.318 Testing: Verify written policy on conflicts of interest addressing actions to be taken when there is an appearance of or actual conflict of interest. Fiscal records must be retained for a period of 3 years from the date of submission of the final expenditure report Testing: Verify written policy for minimum records retention of at least 3 years after grant end date. Separation of duties, 2 CFR § 200.303 			
---	--	--	--

<p><u>Testing:</u> Verify written procedures for separation of duties, especially for expenditure approval and cash management, and inventory management.</p>			
Section A-II. Allowability of Costs			
<p>1. Did the LEA submit a detailed expenditure report showing the total amount expended for IDEA Part B §§ 611 and 619 subgrants?</p> <p><u>Testing:</u></p> <ul style="list-style-type: none"> Review the detailed expenditure report of IDEA Part B §§ 611 and 619 grants to ensure that the LEA submitted a report that includes all the expenditures charged to each applicable subgrant. Compare the total amount shown in the detailed expenditures to the year-to-date and grant-to-year expenditure amounts reported to the WDE, including carryover. <p><i>2 CFR § 200.403</i></p>	<p>General ledger report — to include detailed expenditure transactions: funding source, description of expense, vendor name, payment date, invoice number, and amount paid</p>		

<p>2. Are expenditures adequately documented, reasonable, necessary, and allocable to the grant?</p> <p>Testing: Analyze supporting documents, invoices submitted (up to 50) to determine if</p> <ul style="list-style-type: none"> the information included on the invoice and other supporting documentation matches the information recorded in the detailed expenditure report, the price of the item or service purchased is acceptable, the cost can be attributed to the special education program, and the payment was aligned with the IDEA Part B §§ 611 and 619 approved budget. <p>Select up to 25 additional transactions and request supporting documentation, if necessary.</p> <p><i>2 CFR § 200.403</i></p>	<p>General ledger report — to include detailed expenditure transactions: funding source, description of expense, vendor name, payment date, invoice number, and amount paid</p> <p>Up to 25 invoices, purchase orders (POs), and other supporting documentation</p> <p>Program and fiscal staff interviews</p>		
<p>Section A-III. Allowability of Salaries and Benefits (Time and Effort)</p>			

<p>1. Are the charges to federal awards for salaries and wages, including stipends, based on records that accurately reflect the work performed and salary distribution?</p> <p><u>Testing:</u></p> <ul style="list-style-type: none"> • Verify that employees working 100% on one federal grant or cost objective (such as IDEA Part B § 611, Coordinated Early Intervening Services [CEIS]), regardless of the funding source, complete a semiannual certification or a similar certification. • Verify that employees working on two different federal grants or two different cost objectives (e.g., IDEA Part B, CEIS, or Every Student Succeeds Act (ESSA) schoolwide program) complete a PAR or something similar such as a timesheet showing how activities are charged to each grant or cost objectives. • Verify staff employment contracts or job descriptions of up to six staff to ensure that salaries and benefits paid from each grant are allowable. • Select up to six additional employees' supporting documentation, if necessary. 	<p>Documentation of up to six (6) employee activities that worked on IDEA grants and cost objectives: PAR, semiannual certification or a substitute system, job description, and employment contract</p>		
	<p>Gross payroll report to include detailed transactions: funding source, employee name, total year to date salary paid, full-time equivalent (FTE)</p>		

2 CFR §§ 200.430, 200.403(a)			
Section A-IV. Inventory Management			
<p>1. Does the LEA have an Inventory Management System in place for tracking property acquired with IDEA federal funds? Does the inventory list include the description, condition, serial number, deployed location, custodian, acquisition date, acquisition cost, and disposition of equipment?</p> <p><u>Testing:</u></p> <ul style="list-style-type: none"> • Verify that the LEA submitted an inventory list. • Check if the inventory list has all the required information. • During onsite visits, inspect up to 10 inventory items included in the list. <p>2 CFR § 200.313</p>	Inventory list		

<p>2. Has a physical inventory of equipment been conducted within the past 2 years?</p> <p><i>Testing:</i> Review the date of the inventory list to see if completed at least once every 2 years.</p> <p><i>2 CFR § 200.313</i></p>	<p>Proof that physical inventory of property is reconciled with property records at least once every 2 years</p>		
<p>Section A-V. Financial Management System</p>			
<p>1. Does the LEA maintain all fiscal records that fully show all required information in a physical or electronic form?</p> <p><i>Testing:</i> Verify that the LEA submitted an invoice or a Grant Award Notification (GAN) from 6 years prior.</p> <p><i>2 CFR § 200.334</i></p>	<p>GAN from 6 years prior</p>		
	<p>Six (6) copies of invoice paid from 6 years prior</p>		
<p>2. Does the LEA have a financial management system that includes a method to compare actual costs to budgeted costs to ensure that programs are operating within their budgets and in accordance with approved budgets?</p> <p><i>Testing:</i> Verify the existence of a working “budget vs. expenditures” report with accurate allocation and carryover amounts.</p>	<p>Budget vs. expenditures report of the most recent fiscal year for each grant</p>		

WDE Special Education Fiscal Monitoring Manual

Check the budget report of the most current fiscal year. <i>2 CFR § 200.302</i>			
--	--	--	--

Section B: IDEA-Specific Requirements

Compliance Requirement	Evidence (Suggested Documentation)	Compliance Rating: C = Compliant NC = Noncompliant N/A = Not Applicable	Comments/Preliminary Finding — If Applicable
Section B-I. LEA MOE			
1. Did the LEA accurately track and report expenditures for maintenance of effort (MOE)? <u>Testing:</u> Review the MOE detailed expenditure report to ensure that the LEA submitted a report that includes all the expenditures reported to WDE for MOE calculation. <i>34 CFR § 300.203</i>	MOE detailed expenditure reports		
	Up to 25 invoices and POs with other supporting documents of expenditures		
	Provided documentation of exceptions		
2. Are expenditures charged to MOE attributable to the special education program? <u>Testing:</u> <ul style="list-style-type: none"> Analyze supporting documents and invoices submitted (up to 25) to determine if the information included on the invoice 	MOE exception and adjustment supporting documentation		

Compliance Requirement	Evidence (Suggested Documentation)	Compliance Rating: C = Compliant NC = Noncompliant N/A = Not Applicable	Comments/Preliminary Finding — If Applicable
<p>and other supporting documentation matches the information recorded in the detailed expenditure report.</p> <ul style="list-style-type: none"> Determine if the cost can be attributed to the special education program. Select up to 25 additional transactions and request supporting documentation, if necessary. <p><i>34 CFR § 300.203</i></p>	<p>Expenditure report of amount allocated to Elementary and Secondary Education Act (ESEA) activities for MOE adjustment</p>		
<p>3. Did the LEA maintain documentation of MOE exceptions and adjustments?</p> <p><u>Testing:</u></p> <ul style="list-style-type: none"> Verify that the LEA submitted supporting documentation of MOE exceptions and adjustments. Compare the amount from the supporting documentation to the total amount of MOE exceptions. Verify that the expenditure report for ESEA activities was equal to the MOE adjustments. <p><i>34 CFR §§ 300.204 and 205</i></p>	<p>MOE exceptions and adjustments supporting documentation</p> <p>Expenditure report of amount allocated to ESEA activities for MOE adjustments</p>		

Compliance Requirement	Evidence (Suggested Documentation)	Compliance Rating: C = Compliant NC = Noncompliant N/A = Not Applicable	Comments/Preliminary Finding — If Applicable
Section B-II. Voluntary and Comprehensive CEIS			
1. Did the LEA submit a CEIS / Comprehensive CEIS (CCEIS) detailed expenditure report? <u>Testing:</u> Verify that a CEIS/CCEIS detailed expenditure report was submitted. <i>34 CFR § 300.226 and 34 CFR § 300.646</i>	CEIS/CCEIS detailed expenditure reports Up to 15 invoices and POs with other supporting documents of expenditures paid with CEIS/CCEIS funds		
2. Does the total amount from the detailed CEIS/CCEIS expenditure report equal the total amount reported in the CEIS/CCEIS annual report submitted to the WDE? <u>Testing:</u> Compare the total amount reported through the CEIS/CCEIS expenditure report to the total amount from the CEIS/CCEIS detailed expenditure reports submitted. <i>34 CFR § 300.226 and 34 CFR § 300.646</i>			
3. Are the costs from the sample of invoices submitted (up to 15 transactions) aligned			

Compliance Requirement	Evidence (Suggested Documentation)	Compliance Rating: C = Compliant NC = Noncompliant N/A = Not Applicable	Comments/Preliminary Finding — If Applicable
<p>with the CEIS/CCEIS plan and approved budget?</p> <p>Testing:</p> <ul style="list-style-type: none"> Analyze supporting documents (description on the invoices, POs, etc.) of up to 15 invoices submitted to determine allocability to CEIS/CCEIS and alignment with the CEIS/CCEIS budget. Select up to 15 additional transactions and request supporting documentation, if necessary. <p><i>34 CFR § 300.226 and 34 CFR § 300.646</i></p>			
Section B-III. Parentally Placed Private School Proportionate Share			
<p>1. Did the LEA submit a private school proportionate share detailed expenditure report?</p> <p>Testing: Verify that a private school proportionate share detailed expenditure report was submitted.</p> <p><i>34 CFR § 300.133</i></p>	Parentally placed private school proportionate share detailed expenditure reports		

Compliance Requirement	Evidence (Suggested Documentation)	Compliance Rating: C = Compliant NC = Noncompliant N/A = Not Applicable	Comments/Preliminary Finding — If Applicable
<p>2. Did the LEA accurately track and report expenditures related to proportionate share?</p> <p><i>Testing:</i> Compare the total amount reported through the private school expenditure report to the total amount included in the detailed expenditure reports submitted.</p> <p><i>34 CFR § 300.133</i></p>	<p>Parentally placed private school proportionate share detailed expenditure reports</p>		
<p>3. Are the expenditures charged to private school proportionate share attributable to services (or purchase of equipment/supplies) provided to eligible private school students under IDEA?</p> <p><i>Testing:</i></p> <ul style="list-style-type: none"> Analyze supporting documents (description on the invoices, POs, etc.) of up to 15 invoices submitted to determine allocability to parentally placed private 	<p>Parentally placed private school proportionate share detailed expenditure reports</p> <hr/> <p>Up to 15 invoices and POs with other supporting documents of expenditures paid with private school proportionate share funds</p>		

Compliance Requirement	Evidence (Suggested Documentation)	Compliance Rating: C = Compliant NC = Noncompliant N/A = Not Applicable	Comments/Preliminary Finding — If Applicable
<p>school proportionate share.</p> <ul style="list-style-type: none"> Select up to 15 additional transactions and request supporting documentation, if necessary. <p><i>34 CFR § 300.133</i></p>	Services plan documenting agreed-upon services to be provided		
Section B-IV. IDEA/Title I-A Schoolwide Expenditures			
<p>1. Did the LEA budget IDEA funds for its ESSA schoolwide budget?</p> <p><i>Testing:</i> Verify the IDEA and Consolidated Grant Application approved budgets to determine if the LEA budgeted for ESSA schoolwide activities.</p> <p><i>34 CFR § 300.206</i></p>	Documentation supporting the calculation of the IDEA amount transferred to the ESSA schoolwide budget		Applicable only for LEAs that use IDEA funds for schoolwide activities
<p>2. Was the methodology used to calculate the amount of IDEA funds that must be transferred to the schoolwide budget accurate?</p> <p><i>Testing:</i> Verify that the amount transferred from IDEA funds to the ESSA schoolwide budget does not exceed the IDEA allocation received (a) divided by the number of children with</p>			

Compliance Requirement	Evidence (Suggested Documentation)	Compliance Rating: C = Compliant NC = Noncompliant N/A = Not Applicable	Comments/Preliminary Finding — If Applicable
<p>disabilities in the LEA and (b) multiplied by the number of children with disabilities participating in the schoolwide program.</p> <p><i>34 CFR § 300.206</i></p>			

B: Fiscal Monitoring Report for BHD Template

Date: xxxxxxxx

To: Superintendent, Business Manager, and Special Education Director

Cc: Wyoming State Special Education Director

Re: IDEA Part B Fiscal Monitoring Report

Dear xxxxxxxxxx School District Officials,

Thank you for assisting the Wyoming Department of Education (WDE) in the Individuals with Disabilities Education Act (IDEA) Part B Fiscal Monitoring process for xxxxxxxxxx **District Name**. This review was completed on **date xxxxx**. The following federal programs were monitored: **IDEA Part B § 611 (school-age) and IDEA Part B § 619 (preschool)**.

If your fiscal monitoring did not result in findings but included recommendations, your local educational agency (LEA) is not required to formally respond to the recommendations. However, it is important to consider them.

If your fiscal monitoring resulted in findings, we have attached the Schedule of Fiscal Monitoring Findings to this final report. The monitoring findings were determined using information gathered from the review of your fiscal records and any staff interviews that were conducted. Our office is available to provide technical assistance, if needed, to help your LEA design and implement corrective actions plans.

Please respond, in writing, to the findings and send the LEA's Response Report to the Special Education Programs Office, **within 30 days** of receipt of the letter. For the LEA Response Report, identify each finding and include specific documentation to satisfy the finding, OR submit a corrective action plan that includes (1) reference to the finding, (2) a specific measurable objective for satisfying the finding, (3) time line(s), and (4) clear lines of responsibility. According to the General Education Provisions Act (GEPA), 20 U.S.C. § 1232.c, the WDE reserves the right to initially suspend all GRA requests for 60 days and to withhold any payments beyond 60 days if no corrective action plan is implemented. Please do not hesitate to contact our office with questions as the district's Response Report is prepared.

If the LEA has comments about the monitoring process, the LEA is encouraged to contact xxxxxxxxxx at xxxxxxxxxx or at xxxxxxxxxx, or xxxxxxxx at xxxxxxxx or at xxxxxxxxxx.

Thank you for the cooperation and assistance your district provided the reviewers during the fiscal monitoring. It is in this spirit of collaboration and support that WDE submits this Final Report. It is our sincere desire that through cooperative assessment of the IDEA Part B § 611 and § 619 programs, the quality of services to students receiving special education services is strengthened.

Sincerely,

Senior Fiscal Analyst — Special Education Programs Office
Wyoming Department of Education

C: Fiscal Monitoring Closeout Letter for BHD Template

Date: xxxxxxx

To: Superintendent, Business Manager, and Special Education Director.

Cc: Wyoming State Special Education Director

Re: Special Education Fiscal Monitoring Closeout

Dear xxxxxxx School Officials,

Based on the review of the initial and additional evidence submitted on xxxxxx, the Special Education Programs Office considers that all findings are resolved, and no further action is required at this point.

Sincerely,

Senior Fiscal Analyst — Special Education Programs Office
Wyoming Department of Education

D: Single Audit Finding Letter

Date: XX-XX-XX

Name, Business Manager

Name of LEA

Address

RE: Management Decision Letter

Dear LEA/Business Manager:

Uniform Grant Guidance § 200.331, and Subpart F §§ 200.513, 200.521 requires the Wyoming Department of Education (WDE) to review all single audit reports and determine if an institution has taken appropriate measures to correct any findings related to federal programs.

The WDE has completed our review of the single audit report for the LEA for the period ending June 30, 2020. Based on our review of your corrective action plan for the finding number 20xx-001 related to the **insert finding** and **additional finding**; it appears your plan will reasonably address the related findings. If, however, you do not implement your plan as intended or your plan does not adequately address the findings noted, you are required to notify the WDE of further corrective action plans.

An institution has the right to appeal the decision made by the WDE. In the event you disagree with the management decision, the administrative process is available to the institution via contested case provisions. Chapter 3 of the Rules and Regulations of the Wyoming Department of Education outlines the practice and procedure for contested case proceedings and describes the appropriate manner in which an institution may request such a hearing. If you have any questions, please contact Deb Montoya at deb.montoya@wyo.gov or 307-777-6220.