



DEPARTMENT OF EDUCATION

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Delaware ESSER 60 Day Report –Internal Control and Subrecipient Monitoring Plan

I. Internal Control Plan

A. Management Structure:

1. Members of the Leadership Team are making the final decisions on how ESSERF SEA reserve funds will be spent. This ensures funds are being spent per ESSERF guidelines. Leadership Team members include:
Dr. Susan Bunting, Secretary of Education;
Dr. Christine Alois, Deputy Secretary of Education;
Michael Rodriguez, Associate Secretary, School Support Services; and,
Dr. Charles A. Longfellow, Associate Secretary, Operations.
2. Staff responsible for managing and monitoring subrecipients include:
Phil Keefer, Director of Title Programs; and,
Cathy Wolfe, Education Associate, Federal Funds

- B. Identifying Risk: The Delaware Department of Education (DDOE) maintains a comprehensive structure/process for procurement and payables that mitigates risks. DDOE abides by the Delaware Budget and Accounting Manual (BAM) and DDOE's Administrative Policies and Procedures (APP) manual specifically Section II Finance. Copies and or links to the manuals can be provided for additional information.

Items that reduce risk during the procurement/subrecipient awards include:

1. The BAM and APP's procurement process is stricter than federal guidelines. For purchases greater than \$10,000 DDOE workgroups must submit a Request for Procurement/Subgrant Opportunities form that is reviewed by the Professional Services Review Committee (PSRC) for approval prior to submitting a contract for consideration. The PSRC consists of the Secretary (or Designee), Associate Secretary of Operations Support, Director of Finance and Finance Education Associate for contracts. The funding requests outline the purpose of the funds, source of the funds, and estimated performance dates.
2. All contracts DDOE enters into uses the standard Delaware boilerplate that has been vetted by the Office of Management and Budget, Government Support Services (GSS), the DDOE's Deputy Attorney General.
3. Contracts and payment vouchers are subject to multiple approvals. Payment voucher approvals are obtained through the workflow process in Delaware's automated financial system. Approvals for contracts and payment vouchers include the following:
 - a. director of the workgroup;

- b. associate secretary of the team;
 - c. education associate in Finance for contracts;
 - d. education associate for state or federal funds;
 - e. Finance director;
 - f. Associate Secretary of Finance; and,
 - g. Purchase Orders and payment vouchers are also approved by the Delaware Division of Accounting.
4. Contractors and subrecipients are required to have a Delaware Business License, DUNS number, be a vendor in Delaware's automated financial system, and cannot be on the federal Debarment and Suspension list. This information is checked prior to any payments to vendors/subrecipients are made.
 5. DDOE completes a risk assessment each year for subrecipients. Please see attached *UGG Financial Risk Assessment question descriptions.docx*.
- C. Primary Documentation: DDOE requires all primary/payment support documentation to be attached to the payment voucher in Delaware's automated financial system. A payment voucher cannot be approved without the documentation. This includes a copy of the signed contract for purchase orders, an invoice with performance dates and/or deliverables approved by project manager, and copies of receipts as necessary.

II. Subrecipient Monitoring Plan

DDOE recognizes the importance of ensuring that ESSERF funds are expended as intended by the CARES Act. DDOE has a comprehensive subrecipient monitoring plan which will mitigate risk and ensure the funds are spent according to prescribed guidelines. Of particular note, DDOE has the ability to view all financial transactions against the ESSERF grant because all of Delaware's local education agencies (LEAs) are required to utilize the same automated financial system as State of Delaware's departmental agencies. DDOE's monitoring protocols are included below.

- A. DDOE has recently revised its monitoring process and protocols. The automated monitoring process includes a rotational review of LEAs to include both programmatic and fiscal issues and has been updated to include the ESSERF grant. The district and charter school risk assessment results are taken into consideration for additional monitoring. Please see the attached *Monitoring Tool Kit* document.
- B. In addition to the monitoring process, the DDOE Finance Office conducts an annual equipment and period of performance audit for federal funds for all LEAs. The DDOE Finance Office also intends to conduct a quarterly review of random transactions LEAs have processed against the ESSERF grant and request additional documentation if needed.