

FEDERAL PROGRAM MONITORING

Title II, Part A - Webinar

January 15, 2026

2:00pm – 3:00pm

VIRGINIA DEPARTMENT OF EDUCATION

AGENDA

- Purpose
- Preparation
- Monitoring Protocol
- Common Findings
- Next Steps
- SharePoint
- Canvas
- Resources
- Questions

PURPOSE

The SEA is responsible for oversight of the operations of Federal award supported activities. The SEA must monitor activities under Federal awards to assure compliance with applicable Federal requirements and that performance expectations are being achieved.

[§ 200.329 Monitoring and reporting program performance](#)

- To assess program compliance with the law
 - To ensure the quality of internal controls
- To offer technical assistance
- To identify effective practices

[**Title II, Part A, Monitoring Protocol**](#)

VIRGINIA STATEWIDE USE OF FUNDS

Virginia distributes 95 percent of Title II, Part A, funds to LEAs to carry out evidence-based initiatives designed to meet the specific needs of each LEA. Federal program monitoring for the Title II, Part A, program in VA is on a 5-year cycle.



FPM SCHEDULE 2025-2026

Accomack (o)	King George (v)	Rappahannock (v)
Alexandria (o)	Lee (v)	Roanoke (v)
Arlington (o)	Madison (v)	Southampton (v)
Carroll (v)	Montgomery (v)	VSDB-S (o)
Caroline County (v)	New Kent (v)	Virginia Beach (o)
Colonial Beach (o)	Newport News (o)	
Department of Juvenile Justice (o)	Norfolk (o)	
Essex (o)	Orange (v)	
Galax (v)	Poquoson (v)	
Giles (o)	Prince Edward (o)	
Greensville (o)	Prince George (o)	

*Onsite monitoring (o) or Virtual monitoring (v)

TYPES OF MONITORING

On-site Monitoring:

- Coordinate date, start time, location, and any other necessary details with specialists
- Provide telephone number and address for location
- Complete protocol with division's response to each indicator **at least 2 weeks before visit**
- Plan for half to full day for review of protocol responses and documentation

Virtual Monitoring:

- Coordinate date and time with specialists
- Upload documentation along with completed protocol **at least 2 weeks before date**
- Use the Teams link provided by VDOE specialist
- 2-3 hours for review of protocol responses and documentation

Preparation

BEST PRACTICES

- Develop a Support Team
- Develop a documentation system (electronic files, folders, notebooks, etc.)
 - Consider using Federal Program Monitoring protocol as a guide
- Develop calendar
 - Consider setting electronic “reminders”
 - Establish a timeline



BEST PRACTICES

- Review and complete the entire Title II, Part A, Monitoring Protocol
 - All requirements on the protocol will be monitored
- Collect evidence
 - One document may support multiple requirements
- Organize evidence in a notebook, file folders, or electronically to include:
 - 3 years of IPAL reports (SY 23-24, SY 24-25, SY 25-26)
 - 2 years of program/fiscal documentation (FY 23-24, FY 24-25)
- Participate in webinars and academy trainings
- Contact local SSWS contact
 - Ensure SSWS permissions are set up for applications, reimbursements, and budget transfers
 - Ensure name is included in Title IIA Coordinators list in SSWS

ONGOING “DESK CHECKS”

- Application review
- Reimbursement review
- Licensure/Endorsement data
- Equitable distribution of teachers
- Private school participation



****A minimum of quarterly***

PROTOCOL FOCUS AREAS

Area 1: Prior Monitoring

Area 2: Teacher Quality

- Licensure/Endorsement Status
- Equitable distribution of qualified, experienced, and effective teachers between Title I and non-Title I schools
- Teacher and principal evaluations

Area 3: Consultation and Needs Assessment

- Stakeholder Engagement
- Needs Assessment
- Allowable Uses of Funding
- Evidence of Impact

Area 4: Fiscal Requirements

Area 5: Private School Participation

PROTOCOL LAYOUT

Year: Click or tap here to enter text.

Area I: Prior Monitoring Status

1.1: The school division has implemented necessary actions as a result of prior federal program monitoring for Title II, Part A.

Guiding Questions

- When did the division last undergo federal monitoring for Title II, Part A?
- Did the division receive any findings? If so, identify the findings.
- Were all action steps from corrective action plans implemented and maintained?

Acceptable Evidence

- Feedback letters
- Corrective action plan

(Note: Supporting evidence may also be provided under corresponding indicator(s) within the rest of the protocol.)

Local Agency Response

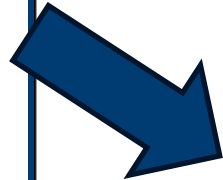
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State Educational Agency Response

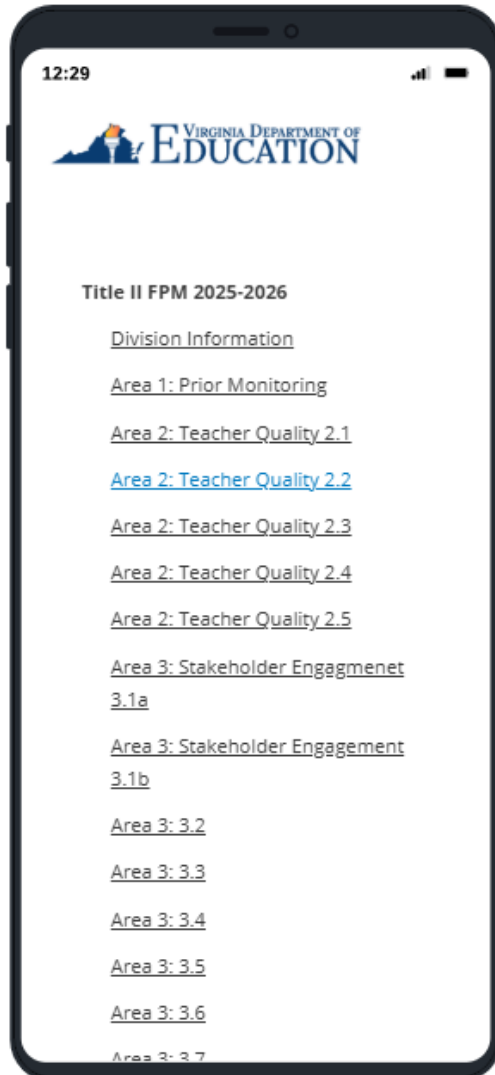
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Sufficient Documentation

Yes No NA



NEW OPTION FOR PROTOCOL SUBMISSION- QUALTRICS



☰
Title II FPM 2025-2026
Division Information
Area 1: Prior Monitoring
Area 2: Teacher Quality 2.1
Area 2: Teacher Quality 2.2
Area 2: Teacher Quality 2.3
Area 2: Teacher Quality 2.4
Area 2: Teacher Quality 2.5
Area 3: Stakeholder Engagement 3.1a
Area 3: Stakeholder Engagement 3.1b
Area 3: 3.2
Area 3: 3.3
Area 3: 3.4
Area 3: 3.5
Area 3: 3.6
Area 3: 3.7
Area 3: 3.8
Area 3: 3.9
Area 4: Allowable Uses of Funds
Area 5: Fiscal Requirement - 5.1

Indicator 2.1

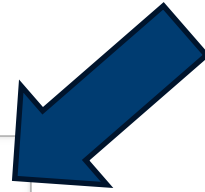
All teachers in the school division in all content areas are properly licensed and endorsed or the division has made progress in each of the last three years.

Guiding Questions:

- What was the percentage of properly licensed and endorsed teachers in your division for each of the last three years?
- Which grades/subject areas have been the most difficult to fill with qualified teachers over the last two to three years?
 - How is the division addressing these issues?
 - Which schools have the greatest challenges?
- What procedures have been developed to ensure qualified teachers have met applicable qualifications?
- How are Title II, Part A, funds used to help ensure all teachers are properly licensed and endorsed?

NEW OPTION FOR PROTOCOL SUBMISSION- QUALTRICS

Local Agency Response



Select the **Required** that has been uploaded into Sharepoint

- Instructional Personnel and Licensure Report (IPAL) from the 2023-2024 Schoolyear
- Instructional Personnel and Licensure Report (IPAL) from the 2024-2025 Schoolyear
- Instructional Personnel and Licensure Report (IPAL) from the 2025-2026 Schoolyear
- Division Data Analysis of Recruitment efforts, endorsement areas, and professional assignments.



Select the **Acceptable Evidence** that has been uploaded into Sharepoint

- Consolidated application or Title II, Part A Application
- Recruitment documentation
- Statement of effort to fulfill licensure requirement
- Cover sheet from licensure for licenses in process, if applicable
- Other
-



WHY QUALTRICS?

- The online Qualtrics submission will streamline the data collection and will help make the monitoring process run smoothly.
- This is the pilot year and we are encouraging everyone to use this method.
- The Title II Coordinator will be emailed a link. This link is specific to your division and should only be shared with other members of the division who are helping submit the documentation.

Monitoring Protocol

PRIOR MONITORING

- 1.1** The school division has implemented necessary actions as a result of prior federal program monitoring for Title II, Part A.
- **Effective Internal Controls/Systems**
 - Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the school division is managing the Federal award in compliance with State and Federal statutes, regulations, and terms and conditions. [§ 200.303 Internal controls](#)
 - Assure compliance with applicable Federal requirements and performance expectations are being achieved. Monitoring by the non-Federal entity must cover each program, function or activity. [§ 200.329 Monitoring and reporting program performance](#)

TEACHER QUALITY

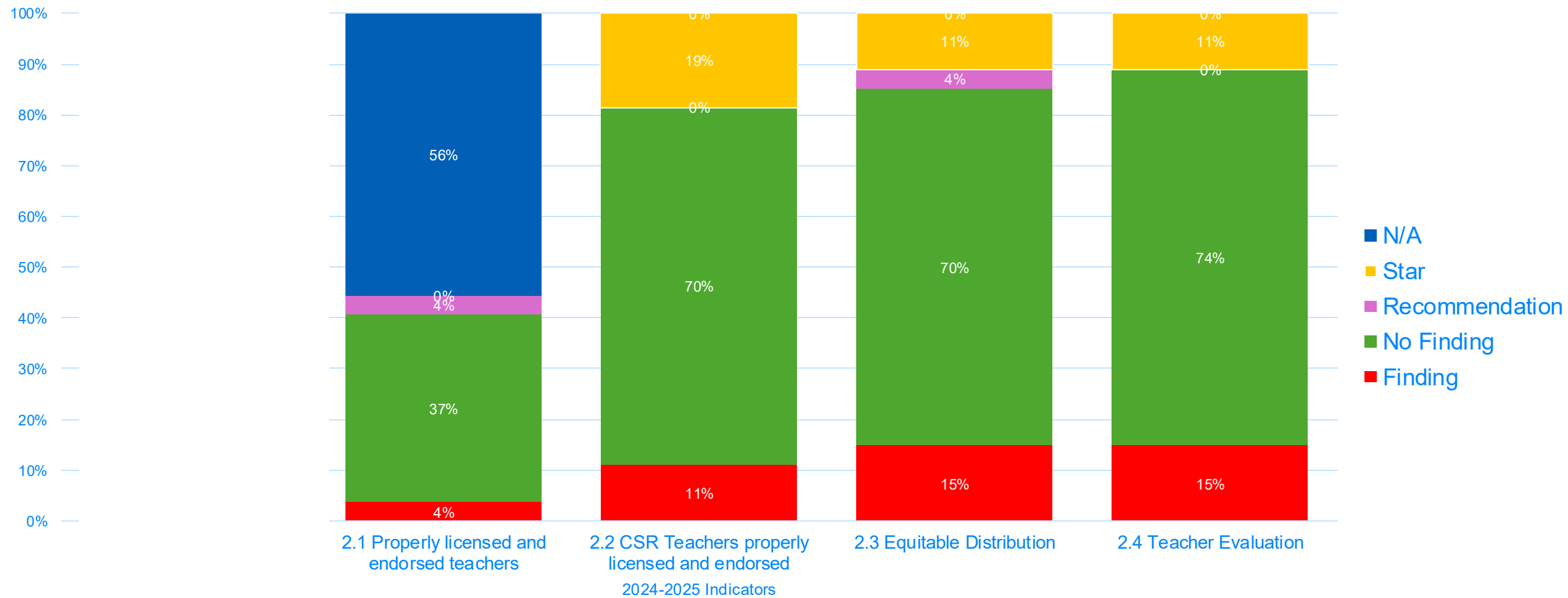
- 2.1** Progress toward 100% fully licensed/endorsed teachers
- 2.2** Licensure status of class-size reduction teachers
- 2.3** *Equitable distribution of qualified, experienced, and effective teachers
- 2.4** Teacher evaluations
- 2.5** Principal evaluations

Sample Evidence

- *Instructional Personnel and Licensure Report (IPAL)
- *List of all schools, by grade span, comparing teacher qualifications, poverty rate, minority status, and average years of teacher experience
- Recruitment documentation
- *Statement of effort to fulfill licensure requirements
- Cover sheet from licensure for licenses in process, if applicable
- Division Data Analysis of Recruitment and endorsement areas professional assignments.
- List of class-size reduction teachers, dates of hire (with Title II, Part A, funds) and qualifications
- Copy of CSR teachers' licenses or license query printout.

AREA 2: TEACHER QUALITY

2024-2025 FPM Results



CONSULTATION AND NEEDS ASSESSMENT

3.1.a Plan is developed in consultation with division stakeholders annually



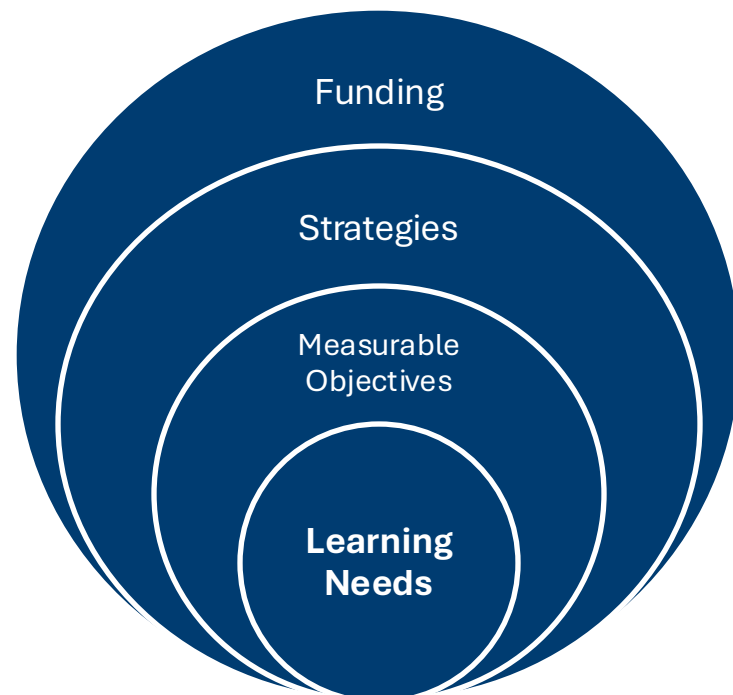
Division Staff (Teachers, Principals, School Leaders, Paraprofessionals)

Specialized Instructional Support Personnel, Private School Leaders (in a division that has private schools)

Parents, Community partners and other organizations with expertise in programs and activities designed to meet the purpose of Title II, Part A

CONSULTATION AND NEEDS ASSESSMENT

3.1.b The Title II, Part A needs assessment process described how the LEA coordinated the division's **professional development plan** with strategies, programs, and activities based on the analysis of **multiple data sources** to identify division needs for improving students' academic achievement according to **the purpose of Title II, Part A.**



CONSULTATION AND NEEDS ASSESSMENT

- 3.2 Activities align with state standards
- 3.3 Plan describes the school system division's system of professional growth
- 3.4 Schools with the highest need are prioritized for services
- 3.5 Activities are coordinated with other funding sources
- 3.6 Division uses a process for selecting evidence-based activities
- 3.7 **Data and ongoing consultation are used to refine the plan**
- 3.8 **Division has made progress on measurable objectives outlined in the application**
- 3.9 Activities address the needs of all learners

CHANGES TO 3.2

Allowable Activities outlined in the Title II, Part A, plan can support one or more of the allowable uses under the guidelines. Complete chart

Example Below:

Allowable Activity	Describe how the division implemented this activity	Describe how the activity supports the implementation of challenging state academic standards.	Current Implementation Status
Developing or improving a rigorous, transparent, and fair evaluation and support system for teachers, principals, or other school leaders			<input type="checkbox"/> Not Implemented <input type="checkbox"/> Partially Implemented <input type="checkbox"/> Fully Implemented
Recruiting, hiring, and retaining effective teachers (including initiatives like early hiring, differential pay, mentoring, etc.)			<input type="checkbox"/> Not Implemented <input type="checkbox"/> Partially Implemented <input type="checkbox"/> Fully Implemented

(See ESEA Section 2103(b) (3) (A-P) for a full description of each allowable activity.)

ALLOWABLE USES OF FUNDING

Allowable Activities outlined in the Title II, Part A, plan can support one or more of the allowable uses under the guidelines.

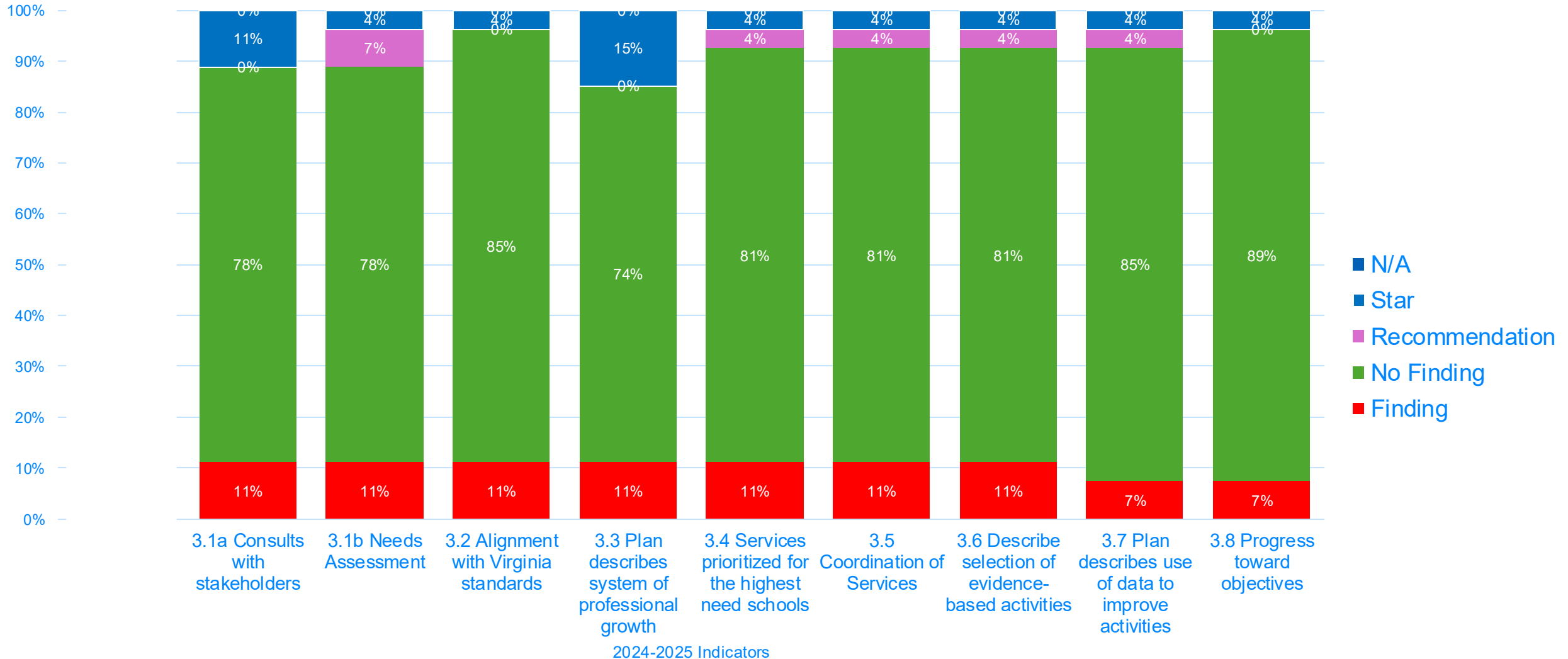
- Multiple Pathways to Teaching and Leading
- Induction and Mentorship
- Meaningful Evaluation and Support
- Strong Teacher Leadership
- Transformative School Leadership
- Support a Diverse Educator Workforce

*More guidance can be found online at the VDOE website.

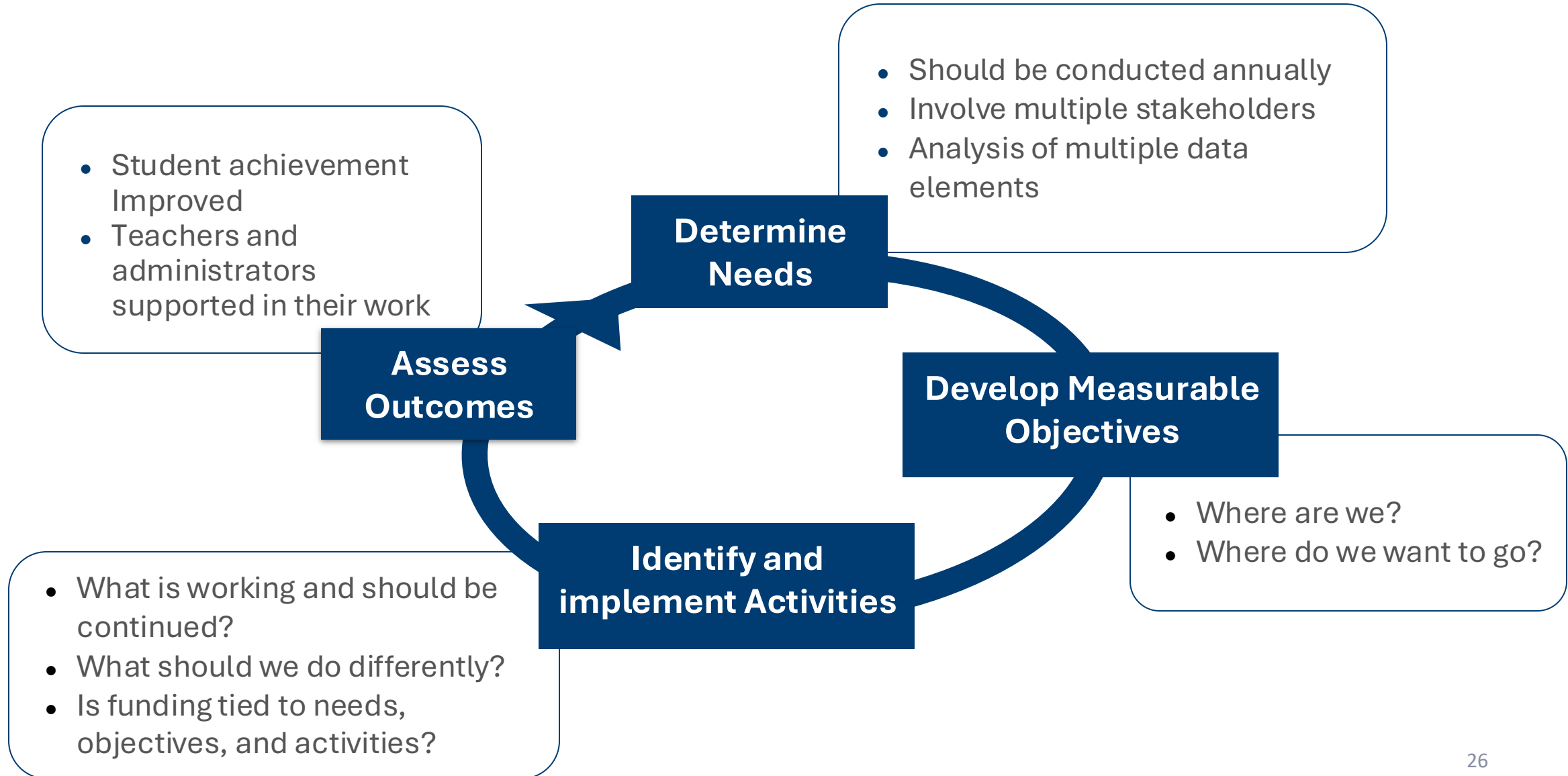
- Recruitment
 - Incentives
- Salaries
 - Title IIA Coordinator
 - Full-time/part-time mentors and coaches
- Licensure/Endorsement
- Coursework
- Conferences
- Class size reduction (CSR)
- Leadership development
 - Teachers
 - Administrators
- Training for teachers
 - Stipends for training
- Mentor programs
- Materials for professional development

AREA 3: NEEDS ASSESSMENT

2024-2025 FPM Results



It's a process...



FISCAL REQUIREMENTS

4.1 Maintenance of effort

4.2 Supplement not supplant

-Activities must not have been funded from a different source in the previous year; or

-Activities must not be a primary function of the school division or mandated by statute

4.3 Implemented activities correlate to the plan submitted to VDOE

-The Federal awarding agency must require the recipient to relate financial data and accomplishments to performance goals and objectives of the Federal award.

4.4 Applications, revisions, and amendments are submitted in a timely manner to ensure timely spend down of funds

4.5 Funds are encumbered and drawn down in a timely manner

4.6 Proper accounting of time is maintained for staff positions funded by grant

WHO NEEDS TO KEEP TIME AND EFFORT?

- **Time and effort must be collected for all employees (not contractors) whose salaries are:**
 - Paid in whole or in part with federal funds.
 - Used to meet a federal match/cost share requirement – even if the match is NOT paid with federal funds.
- **Any employee funded by federal grants must maintain documentation showing that their time is allocable to a federal program.**
- **Documentation must be based on records that accurately reflect the work performed.**

BEST PRACTICES: TIME AND EFFORT

4.6 Proper accounting of time must:

- Be supported by a system of internal controls that provides reasonable assurance that charges are accurate, allowable and allocable (**WRITTEN PROCEDURES**);
- Be incorporated into official records;
- Reasonably reflect total activity for which the employee is compensated;
- Encompass all activities (federal and non-federal);
- Comply with established accounting policies and practices; and
- Support distribution among specific activities or cost objectives.

Time and Effort Reporting

Strong Systems of Internal Controls

Provides Reasonable Assurance that Charges are Accurate, Allowable, Properly Allocated

(2 CFR 200.430).

Validates

Allowability of Payroll Expenditures Charged to Federal Grants

Documentation Tool

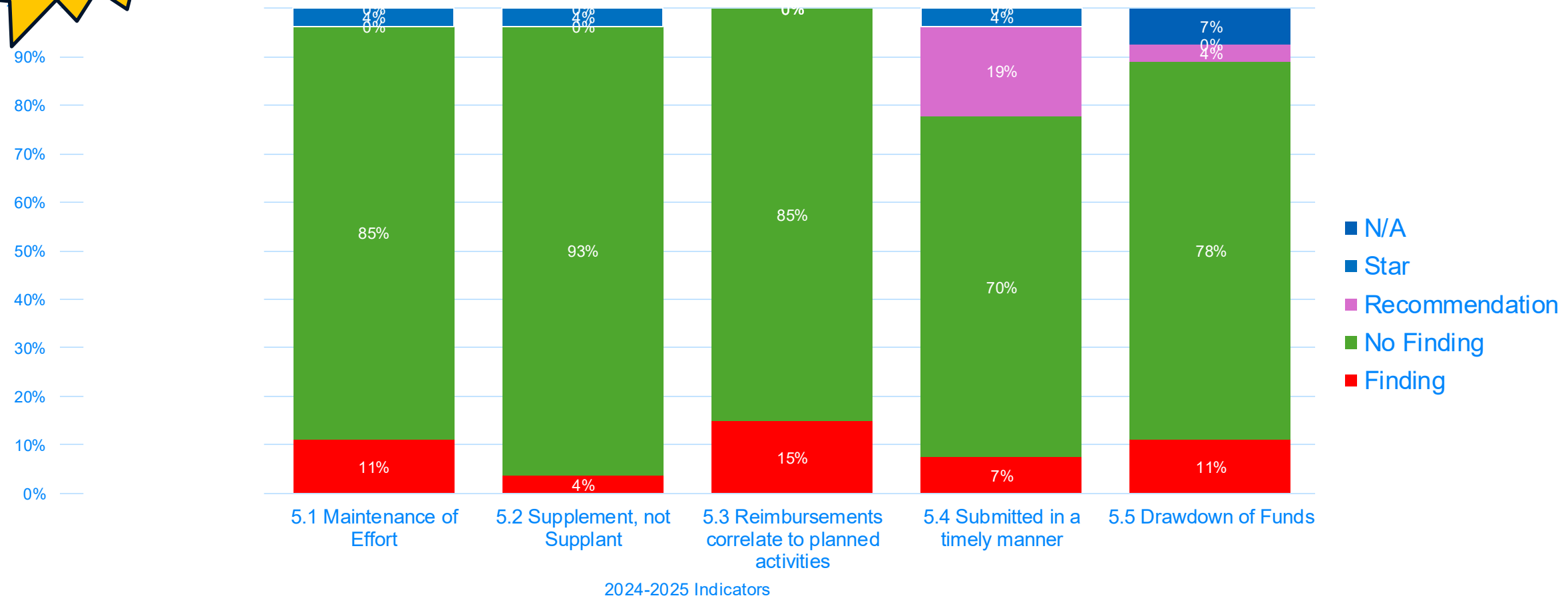
Time and Effort Certification Document

*Required

AREA 4: FISCAL REQUIREMENTS

This was Area 5 last year

2024-2025 FPM Results



PRIVATE SCHOOL PARTICIPATION

- 5.1** Timely and meaningful consultation with private school personnel
 - [Intent to Participate](#) submitted to VDOE
- 5.2** Evidence of planning with private school personnel
 - [Agreement of Services](#)
- 5.3** Equitable services are provided
- 5.4** Funds are properly administered
- 5.5** Division maintains an inventory of fixed assets

PRIVATE SCHOOL PARTICIPATION

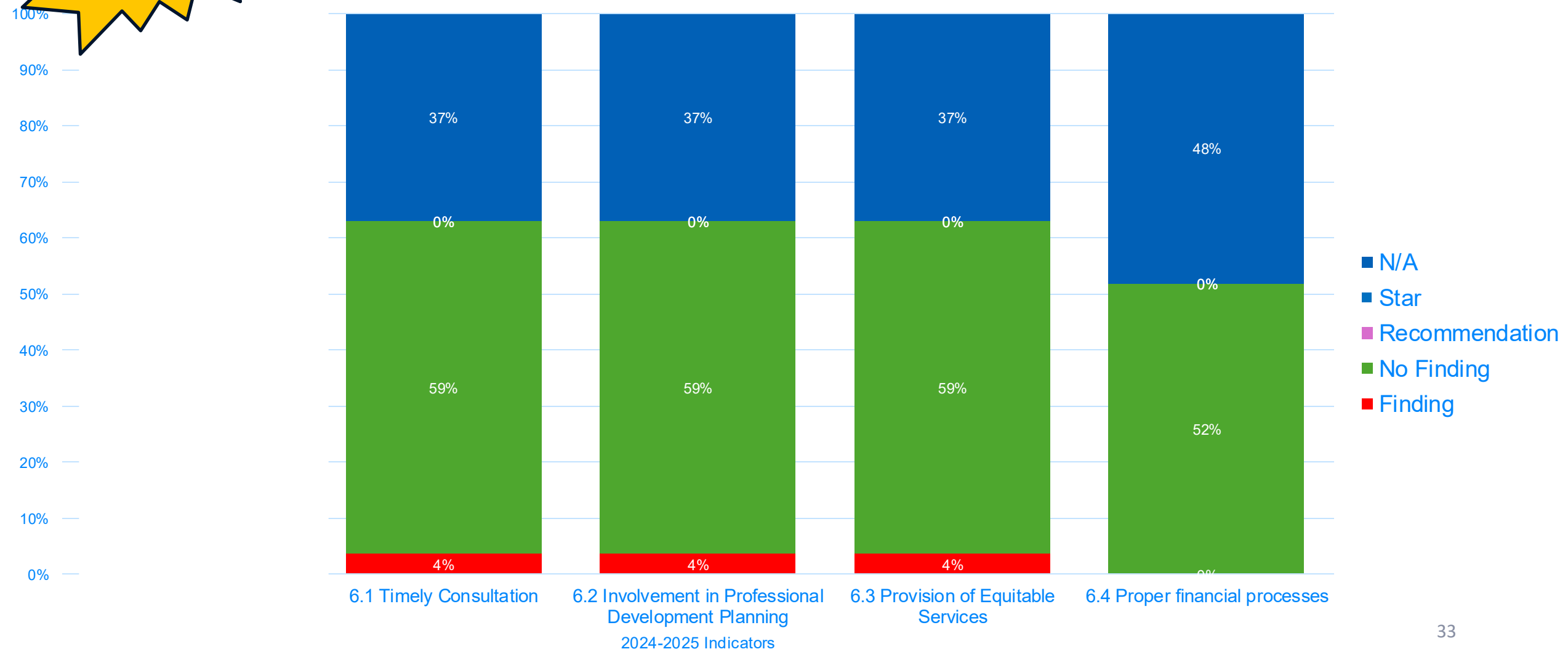
Private School Monitoring Visits

- If the division has private schools that participate in any programs (Title I or Title VIII), the ombudsman will schedule visits with select schools.
- This process will be determined by an internal risk assessment.
- Private schools will be expected to provide documentation regarding the following:
 - Timely and meaningful consultation with private school personnel
 - Evidence of planning with private school personnel
 - Provision of services
 - Funds are properly administered on their behalf
 - Inventory of fixed assets

This was Area 6 last year

AREA 5: PRIVATE SCHOOL PARTICIPATION

2024-2025 FPM Results



WHAT DOES FEDERAL EDUCATION FRAUD LOOK LIKE?

- Financial conflicts of interest
- Altered or falsified documentation
- Missing school funds, property, or records
- Nonexistent students
- Persistent internal control issues
- Irregularities in contract awards or procedures (including undue influence)
- Suspicious or unverifiable vendors
- Defective or low-quality products and services
- Unreasonable costs

[ED OIG Fraud Reporting Guide](#)

CONTRIBUTING FACTORS

- Lack of updated written policies and procedures
- Lack of training for personnel on changes in federal rules applicable to the SEA; lack of fiscal training for program staff
- Incomplete time and effort documentation
- Some programs lapsing funds
- Budgets not consistently used to monitor grant or LEA spending
- Program and fiscal staff working in silos
- Lack of process to obtain technical assistance on compliance with federal rules
- Lack of process for tracking and responding to federal monitoring and audits

2024-2025 FPM Highlights

TITLE II FPM SUMMARY










Largest Findings Areas

Indicator	Focus	# of Findings	# of Recommendations	Percentage of Divisions with Findings
2.1	Properly Licensed and Endorsed Teachers	7	4	25.9%
2.4	Teacher Evaluation	4	1	14.8%
2.5	Principal Evaluation	4	0	14.8%
5.4	Timely Submission	4	0	14.8%

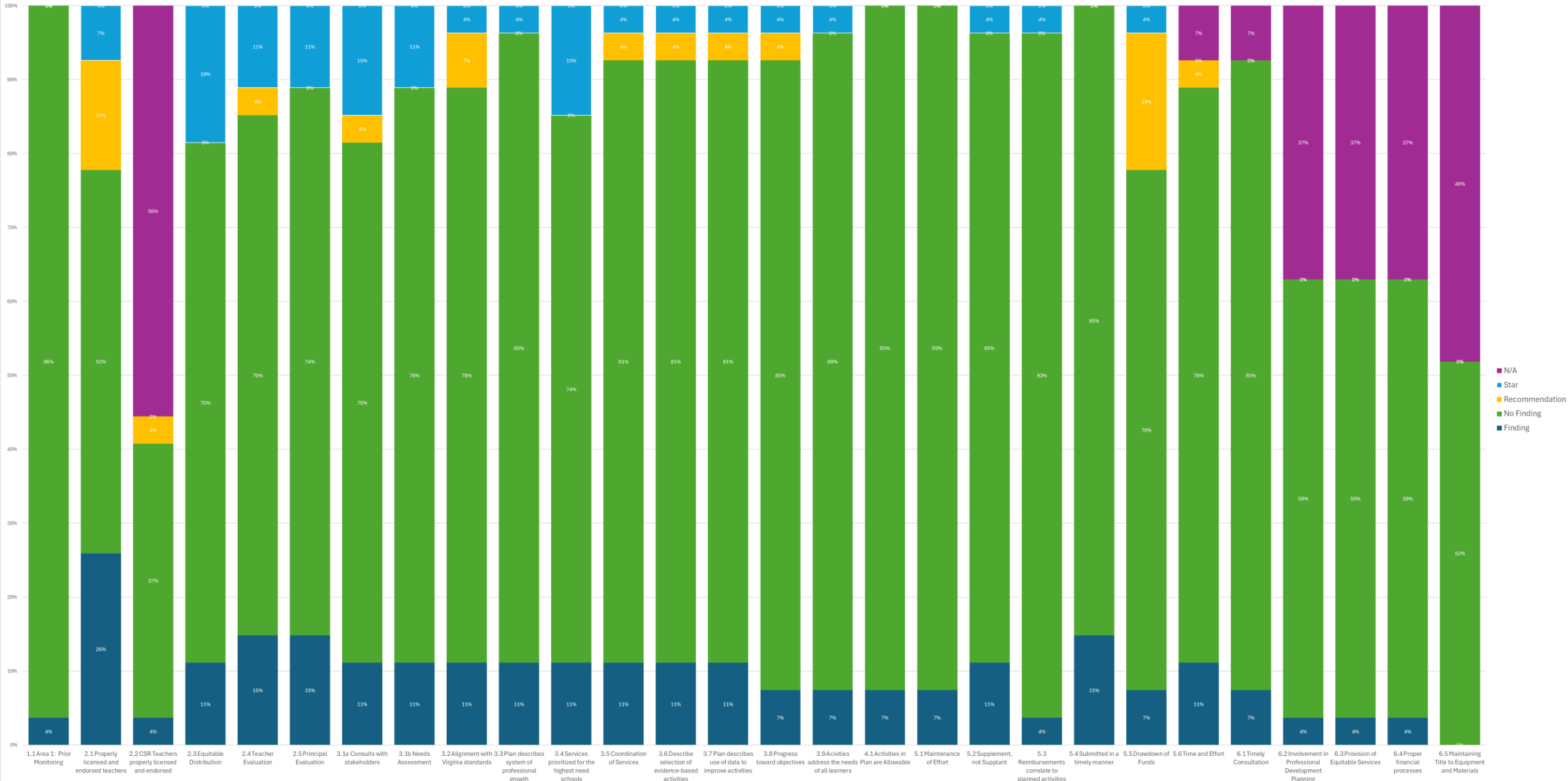
TITLE II FPM SUMMARY

Indicator	Focus	# of Findings	# of Recommendations	Percentage of Divisions with Findings
5.6	Time and Effort	3	1	12%
2.3	Equitable Distribution of Effective Teachers	3	0	11.1%
3.1a	Stakeholder Consultation	3	0	11.1%
3.2	Alignment to Standards	3	0	11.1%
3.3	Coordinated Services	3	0	11.1%
3.4	Selection of Evidence-Based Activities	3	0	11.1%
3.5	Data Use for Continuous Improvement	3	0	11.1%

GOLD STARS

Indicator	Focus	Total Gold Star Divisions					
2.3	Equitable Distribution of Effective Teachers	5					
2.4	Teacher Evaluation	3					
3.1a	Consults with Stakeholders	3					
3.1b	Needs Assessment	3					
3.5	Coordination of Services	5				 	

2024-2025 FPM Results



2024-2025 Indicators

What's Next?

Next Steps:

- Each division scheduled for monitoring will receive an email providing an FPM date and alternate date.
- Division coordinators should reply to coordinator/specialist confirming dates.
- Rescheduling (?)



After Monitoring:

- If necessary, additional evidence must be submitted within **10 business days**
- Official letter sent to division superintendent indicating full compliance or outlining areas of improvement
 - Corrective action plan is required for any requirements found not in compliance

CORRECTIVE ACTION PLAN

- Corrective action plans **must be signed by the superintendent.**
- An optional template will be provided.
- The CAP must include:
 - the finding(s),
 - action steps to address the specific finding(s),
 - evidence of the action steps,
 - person responsible for ensuring the action steps are implemented,
 - timeline or completion date.
- The due date of the plan will be included in the monitoring letter.
- Specialists will meet with division coordinators throughout the year to collect evidence of the implementation of the CAP.
- When all action steps have been successfully implemented, a letter will be sent to each division closing the CAP.

SHAREPOINT

- Divisions will only have access to their file
- No other division can open another division's file



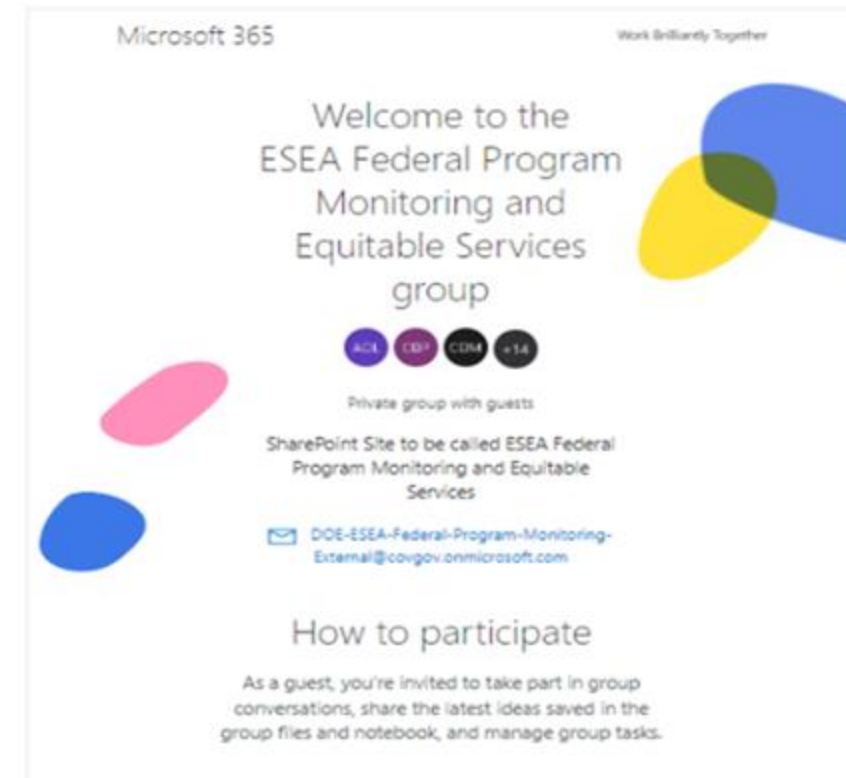
***Important** - Google documents and thumb drives are not an approved method of submitting documents to the Office of ESEA Programs

- Not secure/not allowed
- Can be difficult to log in/access

Accessing SharePoint

As a member of the SharePoint site, a welcome email has been sent informing you that you have been added to the ESEA Federal Program Monitoring and Equitable Services Group.

***If you have not received this email or accessed SharePoint in the past, please indicate so on the shared document.**



To access the new SharePoint site, you can use the direct site link or use the link provided in the email notification regarding your access to the shared folder for your division.

<https://covgov.sharepoint.com/sites/DOE-ESEA-Federal-Program-Monitoring-External/SitePages/Employee-onboarding-team-home.aspx>

SharePoint Format

Home

Meet The Team

Applications, Training, an...

Shared with us

Equitable Services

Title I, Part A

Title I, Part C

Title I, Part D

Title II

Title III

Title IV

Title V

Recycle bin

Edit

Return to classic SharePoint

+ New

Share Copy link Delete Pin to top Add shortcut to OneDrive Download Rename Automate Move to Copy to

Title II > 2023-2024 FPM > Chesterfield

Name	Modified	Modified By
1.1	5 days ago	Johnson, Randall (DOE)
2.1	5 days ago	Johnson, Randall (DOE)
2.2	5 days ago	Johnson, Randall (DOE)
2.3	5 days ago	Johnson, Randall (DOE)
2.4	5 days ago	Johnson, Randall (DOE)
2.5	5 days ago	Johnson, Randall (DOE)
3.1a	5 days ago	Johnson, Randall (DOE)
3.1b	5 days ago	Johnson, Randall (DOE)
3.2	5 days ago	Johnson, Randall (DOE)
3.3	5 days ago	Johnson, Randall (DOE)
3.5	5 days ago	Johnson, Randall (DOE)
3.6	5 days ago	Johnson, Randall (DOE)
3.7	5 days ago	Johnson, Randall (DOE)
3.8	5 days ago	Johnson, Randall (DOE)
3.9	5 days ago	Johnson, Randall (DOE)
4.1	5 days ago	Johnson, Randall (DOE)
5.1	5 days ago	Johnson, Randall (DOE)
5.2	5 days ago	Johnson, Randall (DOE)

All division FPM folders will be formatted the same. The area indicators will be listed as folders from 1.1 to 6.5.

Evidence and supporting information for these areas should be included in the corresponding folder.



CANVAS RESOURCES



Title II, Part A Resources

Preparing, Training & Recruiting High Quality Teachers & Principals



Title II-A University

- NEW**
- LEARNING MODULES
- WEBINARS
- DISCUSSIONS
- GUIDANCE & RESEARCH

Non-Regulatory Guidance	Allocations	Allowability
Applications	Needs Assessment	Equitable Services
Federal Program Monitoring	OMEGA	Time and Effort
Title II University	Frequently Asked Questions	2023-2025 VDOE Presentations
About Title II, Part A	Transferability	

QUESTIONS



REFERENCES

- [ESSA Legislation, Public Law 115-64](#)
- [Building Systems of Support for Excellent Teaching and Leading: Non-Regulatory Guidance](#)
- [Revised Private School Children Non-Regulatory Guidance](#)
- [Title II, Part A: Preparing, Training & Recruiting High Quality Teachers & Principals](#)
- [Title II, Part A, Monitoring Protocol](#)
- [Spending Handbook for Title I, Part A; Title II, Part A; Title III, Part A; and Title IV, Part A](#)
- [Title II, Part A of the Elementary and Secondary Education Act and Equitable Services to Private School Teachers](#)

CONTACT INFORMATION

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