

Colorado BOCES Programmatic and Fiscal Agent Status and Monitoring Clarification

Reimbursement for Expenditures

As the fiscal agent of member districts, the BOCES assumes the responsibilities associated with fiscal requirements for the ESEA funds distributed in the Consolidated Application. A BOCES may obligate funds for districts that have substantial approval and request funds for districts that have both Program and Fiscal final approval. CDE will release funds to a BOCES only for those districts that have received final approval. Therefore, a BOCES will not process Requests for Funds from districts that have not received final approval. If any fiscal problem arises with an individual member district, the BOCES will work with that district and, if necessary, with CDE to resolve the problem.

Monitoring

CDE is required to monitor all districts that accept ESEA funds as part of the consolidated application. The BOCES and its member districts can cooperatively operate within two general models of member agreements. The BOCES and member district's roles and responsibilities will differ depending on the model.

(1) *BOCES operates as the Fiscal Agent Only (pass-through)*: The BOCES, by agreement with its member districts, may act as a Fiscal Agent (i.e., obligate and request funds) for Title IA, Title IIA, and/or Title IID. In doing so, the BOCES assumes the responsibilities associated with ESEA fiscal requirements for monitoring and financial reporting purposes. ESEA programmatic requirements (e.g., parental involvement activities, conducting a needs assessment, nonpublic school consultation) are the responsibility of the member districts. Accordingly, the districts are the primary entity for all non-fiscal monitoring requirements for desk and onsite reviews. However, fiscal findings may be issued at both the BOCES and member district level.

(2) *BOCES operates as the Fiscal Agent and the Programmatic Agent*: The BOCES, by agreement with its members, may assume both fiscal and programmatic requirements associated with Title IA, Title IIA, and/or Title IID. The BOCES is the primary entity for all fiscal and programmatic monitoring requirements for desk and onsite reviews. However, fiscal and programmatic findings may be issued at both the BOCES and member district level.

A BOCES that operates programs or serves as a lead for a Title III consortium for its member districts assumes the fiscal and programmatic requirements on behalf of the member districts. All Title III monitoring findings – desk and onsite reviews – are the responsibility of the Title III consortium.

Irrespective of which model a BOCES and its member districts employ, it is the responsibility of each entity, together with CDE, to resolve all fiscal and programmatic findings related to either

a desk review or onsite monitoring. It is anticipated that the BOCES will work in partnership with any member district found to be out of compliance with either a district level fiscal or programmatic requirement. In the event that the BOCES, with the assistance of CDE, is unable to help a member district resolve a district level finding, CDE will work directly with that member district to ensure compliance with ESEA requirements.

Depending on the specific arrangement between the BOCES and its member districts and per the program area, the responsibility for compliance with fiscal and programmatic requirements may differ from the models outlined in the paragraphs above. Roles and responsibilities will be clarified for each BOCES and its member districts during the application process and prior to a monitoring review.