



OFFICE OF THE STATE
SUPERINTENDENT OF EDUCATION

Annual Grants Monitoring Indicators for Fiscal Year 2023 Evidence List for Fiscal Monitoring

This document lists indicators that apply to local education agencies (LEAs) receiving fiscal monitoring for Elementary and Secondary School Emergency Relief funding (ESSER) grants and the corresponding mandatory evidence.

LEAs must upload all mandatory evidence to [Box](#) by **March 27, 2024**. Based on reviewing the evidence LEAs provide by March 27, the Office of the State Superintendent of Education (OSSE) may request additional evidence.

To receive access to [Box](#): All staff designated in one or more of the following roles in the [IDS All Staff Collection](#) (formerly eSchoolPlus) system, as appropriate for their role at the LEA, will receive access to Box:

- Head of School;
- LEA Data Manager; or
- LEA Finance/Grants Manager.

Anyone with the LEA Data Manager designation at an LEA can assign their colleagues to one of these roles in the system. Once that occurs and the system refreshes overnight, the staff member receives an automated email the next day that allows them to create a Box account and access the pertinent folders, including monitoring.

Indicator 4.1

The subgrantee has, in effect, written purchasing practices and policies. (2 CFR §200.318(a))

Description of Evidence
Mandatory: Procurement policy

Indicator 4.2

The subgrantee can provide evidence that its purchasing practices and policies ensure that all procurement transactions are conducted in a manner providing full and open competition and that the appropriate method of procurement is being used: micro-purchases; small purchase procedures; sealed bids; or competitive proposals. Some situations which could restrict competition are (1) placing unreasonable requirements on firms in order for them to qualify to do business; (2) requiring unnecessary experience and excessive bonding; (3) noncompetitive pricing practices between firms or between affiliated companies; (4) noncompetitive contracts to consultants that are on retainer contracts; (5) organizational conflicts of interest; (6) specifying only a 'brand name' product instead of allowing 'an equal' product to be offered and describing the performance or other relevant requirements of the procurement; and (7) any arbitrary action in the procurement process. (2 CFR §200.319 and 2 CFR §200.320)

Description of Evidence
Mandatory: Procurement policy (same as 4.1)
Mandatory: List of solicitations used to procure goods and services with federal funds

Indicator 4.3

The subgrantee can provide evidence that internal controls are in place to ensure that contract requirements are being fulfilled by vendors consistent with the terms, conditions and specifications of their contract or purchase orders. (2 CFR §200.318(b))

Description of Evidence
Mandatory: Procurement policy (same as 4.1)
Mandatory: Fully executed contract(s) for OSSE identified procurements in the expenditure sample and contract amendments, if applicable. (see Box for expenditure sample request)
Mandatory: Subgrantee source documentation to support OSSE's expenditure sample requests such as change orders, evaluation(s) of services rendered or work performed, vendor call logs, etc. (see Box for expenditure sample request)

Indicator 4.4

The subgrantee can provide evidence that it performed a price or cost analysis has been performed on procurements over the small purchase threshold (\$100,000 for DCPS, \$25,000 for charter schools) in compliance with published protocols, which may include making independent estimates before receiving bids or proposals. (2 CFR §§200.88 and 200.323)

Description of Evidence
Mandatory: Contract cost or price analysis for solicitations identified in OSSE's expenditure sample (see Box for expenditure sample request)

Indicator 4.5 (Charters Only)

The subgrantee can provide evidence that it submitted the required documentation to PCSB relating to contracts exceeding \$25,000. (2 CFR §200.318(a))

Description of Evidence
Mandatory: Notification to PCSB of contracts totaling \$25,000 or more, to a single vendor for the grant year being monitored, including all correspondence, emails, memorandums to PCSB (i.e., EpiCenter email or screenshot of notification email to PCSB)
Mandatory: List of contracts over \$25,000 or contracts totaling \$25,000 or more from a single vendor for the grant year being monitored.

Indicator 4.6

The subgrantee can provide evidence verifying that maintained procurement documentation is sufficient to detail the history of each transaction, including rationale for the method of procurement, selection of contract type, contractor selection or rejection and the basis for the contract price in regards to price extensions, additions, freight charges, discounts, etc. (2 CFR §200.318(i))

Description of Evidence
Mandatory: Procurement policy (same as 4.1)
Mandatory: Subgrantee source documentation to support OSSE's expenditure sample requests such as the following: <ul style="list-style-type: none">- Requests for proposals- Bids or quotes from multiple vendors- Price lists- Proposed statements of work, estimates, catalogs and other generally available product literature published by comparable vendors- Evidence of review and evaluation of bids (see Box for expenditure sample request)

Indicator 4.7

The subgrantee can provide evidence of written standards of conduct for any employee involved in the award or administration of contracts, including conflicts of interests; accepting gifts, favors, etc. (2 CFR §200.318(c)(1))

Description of Evidence
Mandatory: Conflict of Interest policy

Indicator 4.8 (Charters Only)

If the subgrantee has a parent organization, the subgrantee maintains written standards of conduct covering organizational conflicts of interest. (2 CFR §200.318(c)(2))

Description of Evidence
Mandatory: Conflict of Interest policy (same as 4.7)

Indicator 4.9

If the subgrantee has a parent organization, the subgrantee maintains written standards of conduct covering organizational conflicts of interest. (2 CFR §200.320(f))

Description of Evidence
Mandatory: Conflict of Interest policy (same as 4.7)

Indicator 4.10

The subgrantee can provide evidence and verification showing contractors are not on the Excluded Party List (EPL) and are in good standing. (2 CFR §§200.213 and 2 CFR Part 180)

Description of Evidence
Mandatory: Screenshots showing the date that the subgrantee checked SAM.gov to verify that the vendor was not on the Excluded Party List (EPL) prior to obligating funds to the vendor

Indicator 4.11

Subgrantee only uses noncompetitive proposals under the following circumstances: (1) the item is available only from a single source; (2) the public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation; (3) the Federal awarding agency or pass through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or (4) after solicitation of a number of sources, competition is determined inadequate.

Description of Evidence
Mandatory: <ul style="list-style-type: none">- See evidence in 4.1- If the sole source procurement method was used to purchase goods or services from the OSSE identified expenditure sample, the subgrantee must submit the following:<ul style="list-style-type: none">- the rationale for using the non-competitive process- independent quotes or research- contract or other agreement detailing the services or goods agreed to be provided by the vendor- Link to DC Register notification of solicitation