

Selecting Districts for ESSER Monitoring

Districts are monitored based on a risk assessment process. At the close of each school year, the ODE ESSER Team reviews and analyzes data for all school districts in the following seven categories:

1. **Extent to which districts met the Student Investment Account (SIA) community engagement requirements since 2019.**

A cornerstone of the American Rescue Plan (ARP) Elementary and Secondary School Emergency Relief (ESSER) fund is the requirement that districts conduct meaningful consultation with stakeholders. Oregon's implementation of the Student Investment Account includes a requirement that school districts engage their community and stakeholders continuously. This engagement, formally initiated in fall 2019, has been and continues to be one of the primary ways that districts engage with, learn from and are informed by their community. If the ODE SIA team has identified district that are either out of compliance with community engagement activities or needs additional ODE support to meet requirements, then the ODE ESSER team would deem this fact as one risk factor in the district ESSER monitoring selection process.

Scoring Criteria:

4 points = District was not initially in compliance in each of the following years (2019, 2021, and 2023)

3 points = District was not initially in compliance for two of the following years (19, 21, 23) however, if the district was in compliance for 2023 then they receive 2 points

2 points = District was not initially in compliance in 2023

1 point = District was not initially in compliance in 2021 but were in compliance in 2023

0 points = District was in full compliance since 2021

2. **Percentage of unclaimed ESSER II funds as of August 7, 2023 (See [ODE ESSER Expenditure Transparency Dashboard](#)).**

One risk associated with ESSER grants is funds left unobligated by the end of the grant periods. As ESSER II funds are required to be fully obligated by September 30, 2023, the way ODE chose to identify risk in this area is to measure if districts have obligating funds at a rate commensurate with the time remaining in the grant period. If the district's percentage of remaining ESSER II funds is above the percentage of time remaining to obligate those funds, then the ODE ESSER team would deem this fact as one risk factor in the district ESSER monitoring selection process.

Scoring Criteria:

4 points = >=30% of district funds remaining,

3 points = 29-20% of district funds remaining,

2 points = 19-10% of district funds remaining,

1 point = 9-7% of district funds remaining,

0 points = 6-0% of district funds remaining (based upon processed reimbursements)

(As of August 7, 2023, 6% of time to obligate funds remains for ESSER II)

3. **Percentage of unclaimed ESSER III funds as of August 7, 2023 (See [ODE ESSER Expenditure Transparency Dashboard](#)).**

One risk associated with ESSER grants is funds left unobligated by the end of the grant periods. As ESSER III funds are required to be fully obligated by September 30, 2024, the way ODE chose to identify risk in this area is to measure if districts have obligating funds at a rate commensurate with the time remaining in the grant period. If a district's percentage of remaining ESSER III funds is above the percentage of time remaining to obligate those funds, meaning the district has reimbursed funds at a rate slower than the time remaining, then the ODE ESSER team would deem this fact as one risk factor in the district ESSER monitoring selection process.

Scoring Criteria:

4 points = >=65% of district funds remaining,

3 points = 64-55% of district funds remaining,

2 points = 54-45% of district funds remaining,

1 point = 44-35% of district funds remaining,

0 points = 34-0% of district funds remaining (based upon processed reimbursements)

(As of August 2023, 34% of time to obligate funds remains for ESSER III)

4. **Percentage of funds allocated for [capital projects](#) as of August 7, 2023.**

ESSER funds can be used for capital projects. District approved capital projects often require considerable project management and tracking of data to comply with the grant requirements. Management of these projects requires fiscal, technical, and operational skill and ability to coordinate subprojects. Board and public involvement are often high on these projects. Given these complexities, the ODE ESSER team finds that as the percentage of overall ESSER funds dedicated to capital projects increases, so does the risk associated with those projects.

Scoring Criteria:

4 points = <60%,

3 points = 59-40%,

2 points = 39-20%,

1 point = 20-1%,

0 points = 0%

5. **Percentage of projected costs for approved ESSER II funded capital projects that have been claimed as of August 2023**

As stated earlier, ESSER II and III have deadlines by which these funding streams must be obligated, and capital projects funded with ESSER II funds are of particular interest given the limited time remaining to access ESSER II funds. If the district has sought 6% or less in reimbursements for approved capital projects (94% being the amount of time passed in ESSER III), the ODE ESSER Team finds this to be a risk factor regarding the district's ability to complete the project within the grant period.

Scoring Criteria:

4 points = <6%,

3 points = 6-30%,

2 points = 31-50%,

1 point = 51-80%,

0 point = 81-100% or district has no capital projects (NA)

6. **On-time submission of annual data submission for the annual federal performance report.**

Annually, outcome data associated with state and district use of ESSER funds must be reported to the U.S Department of Education. During the spring, the district data gathering process is initiated and districts are given a deadline by which to submit their data. If a district misses this deadline, it can jeopardize the state's ability to submit the annual performance report on time. So, if a district does not submit their data by the ODE established deadline, then the ODE ESSER Team finds this missed deadline as a risk factor in assessing a district's overall ESSER compliance.

Scoring Criteria:

2 points = Late submission of annual data

0 points = On-time submission of annual data

7. **Any audit findings (Municipal and Federal Single) from the 2019-20, 2020-21 and 2021-22 school years.**

Annually, school districts must undergo a municipal audit to assess how much the district is operating in compliance with state fiscal regulations. For school districts that receive \$750,000 or more in federal funds within a year, a Federal Single audit is also required. If a district receives a finding in either audit, it indicates the districts is operating out compliance with either state or federal regulations and the ODE ESSER Team finds any finding to be a risk factor in assessing a district's overall ESSER compliance.

Scoring Criteria:

4 points = 4 or more audit findings,

3 points = 2 or 3 audit findings,

2 points = 1 finding,

0 points = 0 findings,

If a district has an ESSER specific finding, the district receives 4 points for this indicator regardless of total audit findings.