

# Elementary and Secondary School Emergency Relief Fund (ESSER) Audit

Audit Plan Code: 24.02.A



Assurance | Insight | Objectivity

Final Report  
May 15, 2024

- Fund Development staff monitor the spending of ESSER III funds and are working on a plan to spend any remaining funds from the projects by September 30, 2024.
- The District is exceeding the minimum of 20% spending on learning loss projects as required by the United States Department of Education.
- The District did not implement six (6) of the eight (8) projects tested as submitted to the Texas Education Agency; there were instances of changes in project purpose and/or budget that are not reflected in the District's ESSER III Dashboard. The dashboard should reflect actual project implementation to further demonstrate the District's commitment to transparency and accountability.



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## Abbreviations

CAP	Corrective Action Plan
EIs	English Learners
EPISD	El Paso Independent School District
ESSER	Elementary and Secondary School Emergency Relief
HVAC	Heating, Ventilation, and Air Conditioning
IA	Internal Audit
ID	Identification
IEP	Individualized Education Program
IIA	Institute of Internal Auditors
NOGA	Notice of Grant Award
RFQ	Request for Quote
RTI	Response to Intervention
TEA	Texas Education Agency
TEKS	Texas Essential Knowledge and Skills



# Executive Summary

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We have completed the Elementary and Secondary School Emergency Relief Fund (ESSER) Audit. The objectives of the audit were to determine if the District is:

1. Monitoring the ESSER III project funds so they are spent timely and in their entirety.
2. Spending a minimum of 20% on learning loss projects as required by the United States Department of Education.
3. Implementing the ESSER III "Use of Funds Plan" as submitted to the Texas Education Agency.

The scope focused on the ESSER III grant, which has a period of availability from March 13, 2020, to September 30, 2024.

The Internal Audit Report that follows includes detailed findings and an observation, recommendations, background, and methodology.

We want to acknowledge and thank the Chief of Organizational Transformation and Equity, the Fund Development and Education Foundation Officer, the Assistant Director of Fund Development and Partnerships, the Chief Schools Officer, the Executive Director of Facilities and Construction, the Chief Academic Officer, the Director of Counseling and Advising, the Assistant Superintendent Information Security and Technology, the Executive Director of College and Career Readiness Innovation, and the respective staff who participated in this audit for their time.

## What We Found

1. The Fund Development Department is monitoring the spending of the funds as follows:
  - a. Uses spreadsheets to identify project funds using the specific fund, object, and sub-object combinations to monitor the funds spent by project because unique accounts were not set up for each project.
  - b. Updates the ESSER III Dashboard to show the status of the projects, budget, expenses, and balances. However, the ESSER III Dashboard does not reflect the percentages spent from the budgets originally planned to show if the projects were implemented as outlined in the "Use of Funds Plan." See findings 2 and 3 for details.
  - c. Communicates with project leads, cabinet members, Superintendent, and Board of Trustees on the progress of projects or funds spent.

As it relates to spending funds in their entirety, Fund Development staff are working on a plan to spend any remaining funds by September 30, 2024.

2. The District had spent 22% of the allotted ESSER III grant in 18 learning loss projects as of October 17, 2023, exceeding the minimum of 20% required by the United States Department of Education.
3. The District's ESSER III "Use of Funds Plan" has not been implemented as submitted to the Texas Education Agency (TEA) for six (6) of the eight (8) projects tested. One project's expected outcomes have changed, one project was partially implemented, one project was implemented and completed, but

an evaluation has not been performed, one project's implementation is lagging, and two projects were not implemented.

There was no requirement for a formal written process to document the approval and justification for changes/adjustments to the "Use of Funds Plan." However, a plan is required to ensure transparency and accountability in how the District is using the funds to address students' needs. Therefore, it is important that the District formally document justifications for changes to show how projects evolved during their implementation and demonstrate the changes were made strategically to support District initiatives. Maintaining supporting documentation for changes to the "Use of Funds Plan" will assist the District in its commitment to transparency and accountability and for potential future external audits.

Instead of updating the "Use of Funds Plan," the Fund Development Department created an ESSER III Dashboard, which is on the District's main webpage, to show how the District is using the ESSER III funds in a condensed format. However, in some instances, the ESSER III Dashboard does not reflect changes in the purpose of the project, the original budget (which would reflect the changes in scope/funds allocated), and/or project status.

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## What We Recommend

Internal Audit made six (6) recommendations:

1. Fund Development should continue with the development of a plan on how the District will spend project balances (remaining ESSER III funds). We recommend Fund Development keep documentation to support how the plan was developed, including rationale, project budget allocations, and approvals.
2. Fund Development should update the ESSER III Dashboard with the actual information about the ESSER III projects, including purpose, funding, and progress on the District's webpage. This information should be in a format that is clearly defined and easily understood, cognizant of the District's commitment to transparency and accountability. If a project is revised or not implemented, it should be clearly stated, and if a project is added, it should be added as such.

In addition, Fund Development should work with project leads to document the justification for projects that (i) were not implemented, (ii) had changes in purpose, and (iii) had budget changes. The information and documentation compiled by Fund Development should be used to ensure the ESSER III Dashboard reflects actual project implementation. For example, the ESSER III Dashboard should show changes in the project purpose (e.g., the Student Attendance Tracking System), budget, implementation status ("Closed" = "Not Implemented"), and outcomes/evaluation results.

3. Fund Development should ensure TEA "Department of Grant Compliance and Administration Justification/Documentation of Allowable Use of ESSER Funds" forms exist and are up to date for each project. The TEA requires these forms to be maintained at the local level for audit and monitoring purposes. See Finding 1 as an example.
4. For future projects, Fund Development should create grant management materials with resources and tips for project leads in the following areas to ensure projects are implemented and timelines are met:

- a. Budget management – how to determine the funds allocated to the project, funds spent, and balance so project leads can make informed decisions when implementing their projects and utilize the funds for the maximum benefit of students.
  - b. Developing and maintaining supporting documentation – how to document changes in project implementation. For example, changes in purpose, outcomes, and/or budget allocated.
  - c. Procurement process – location of existing procurement resources available, including, but not limited to, how to obtain quotes and contract approval.
  - d. Timelines – location of documentation showing the grant's period of availability and any changes to the timeline so they can plan accordingly when implementing the project.
  - e. Project evaluation – the importance of performing an evaluation to determine if the project's expected outcomes were achieved, how to identify the data needed for the evaluation, and how it will be captured, monitored, and reported.
5. Fund Development in collaboration with project leads should ensure evaluations are performed for all the projects classified as "Complete" to determine the outcomes of the funds spent (e.g., Project #65 SPED Learning Loss). Supporting documentation of the evaluation should be retained.
  6. Fund Development in collaboration with the Executive Director College and Career Readiness Innovation and the Project Lead should work to develop a project implementation plan to ensure Project #99 Planetarium is completed and funds are spent by September 30, 2024.

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## Management's Response

Management and leadership agreed with the audit findings. District management and leadership submitted a Corrective Action Plan (CAP) outlining five (5) activities to be implemented. The six (6) recommendations made by Internal Audit were incorporated into the CAP. The CAP appears to be sufficient to address the findings outlined in this report. Internal Audit will conduct follow-up reviews to validate that CAP activities have been implemented.





# Audit Report

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## Objective and Scope

The objectives of the audit were to determine if the District is:

1. Monitoring the ESSER III project funds so they are spent timely and in their entirety.
2. Spending a minimum of 20% on learning loss projects as required by the United States Department of Education.
3. Implementing the ESSER III “Use of Funds Plan” as submitted to the Texas Education Agency.

The scope focused on the ESSER III grant, which has a period of availability from March 13, 2020, to September 30, 2024.

## Results, Recommendations, and Management’s Response

The El Paso Independent School District (EPISD) submitted to the Texas Education Agency (TEA) an Elementary and Secondary School Emergency Relief Fund (ESSER) III grant application to implement a “Use of Funds Plan” with 51 projects. The notice of grant award (NOGA) for \$190,723,543 was issued on July 15, 2021. The number of projects changed from 51 to 48; four (4) projects were added, and seven (7) were combined with other projects. According to the ESSER III Dashboard, as of October 17, 2023, the District had completed 13 (27%) projects, 21 (44%) projects were active (in progress), and 14 (29%) were closed (i.e., not implemented). The grant’s period of availability ends September 30, 2024. Appendix A shows the projects funded with ESSER III, status, category, original budget amount per the “Use of Funds Plan,” amended budget amount, and balance per the ESSER III Dashboard as of November 8, 2023.

The following sample of eight (8) projects funded with ESSER III funds were tested to determine:

- If the project was implemented.
- If the original budget allocations match the “Use of Funds Plan.”
- The existence of supporting documentation showing the rationale for changes to the “Use of Funds Plan.”
- If completed projects were evaluated to determine outcomes.

Project	Status (ESSER III Dashboard)
2 Student Attendance Tracking System	Active
8 HVAC Replacement in high-occupancy areas	Active
55 Tutors	Complete (Implemented)
60 Mental Health Support & College Access	Complete (Implemented)*
65 Special Education Service Continuum for Students’ Learning Recoupment	Complete (Implemented)
72 EL Tutor Project – Elementary	Closed (Not Implemented)
86 Content Learning Centers for Secondary	Closed (Not Implemented)
99 Planetarium	Active**

\*= A small percentage of the funds allocated per the “Use of Funds Plan” was utilized to partially implement the project.

\*\*= Project not in the “Use of Funds Plan,” but added with a grant amendment.

According to guidance from the ESSER State Director in the TEA Department of Grant Compliance and Administration, “LEAs should update their “Use of Funds Plan” when a significant change was made to the plan.” The Department of Education 34 CFR Chapter II states:

- The Local Education Agency (LEA) plans “are necessary to ensure transparency and accountability for use of the funds...the public and in particular students, their families, and educators, have a vested interest in understanding an LEA’s priorities and plans for the funds and whether and how the LEA will use the funds to address their students’ academic, social, emotional, and mental health needs.”
- According to the American Rescue Plan (ARP), the “Use of Funds Plans” ensure that LEAs use ESSER funds for their intended objectives.

We want to acknowledge and thank the Chief of Organizational Transformation and Equity, the Fund Development and Education Foundation Officer, the Assistant Director of Fund Development and Partnerships, the Chief Schools Officer, the Executive Director of Facilities and Construction, the Chief Academic Officer, the Director of Counseling and Advising, the Assistant Superintendent Information Security and Technology, the Executive Director of College and Career Readiness Innovation, and the respective staff who participated in this audit for their time.

## Finding 1

The Student Attendance Tracking Project will not address the attendance component; however, the safety and security components remain. The ESSER III Dashboard was not updated to reflect the changes

Project #2 Student Attendance Tracking System is not being implemented as submitted in the ESSER III grant application “Use of Funds Plan.” According to TEA guidance obtained, “LEAs should update their “Use of Funds Plan” when a significant change was made to the plan.” In lieu of updating the “Use of Funds Plan,” Fund Development uses the ESSER III Dashboard to show the project’s status and purpose. Since the dashboard is how the District communicates with the community and the Board of Trustees, it is important that the dashboard be accurate and updated.

The Student Attendance Tracking System project remains on the ESSER III Dashboard on the District’s website as “Active” with the description summary: “Improve safety, security, and contract (sic) tracing for student while on campus with a new student attendance tracking system.” The initial budget allocated to the project in the “Use of Funds Plan” was \$6,100,000. The amended budget for the project is \$5,496,565. As of November 8, 2023, the total amount spent is \$141,792 (2.6% of the amended budget).

According to the TEA’s “Department of Grant Compliance and Administration Justification/Documentation of Allowable Use of ESSER Funds” Form dated May 12, 2023, which is required for each project for monitoring purposes, the activity description was to “Implement Tracking and Attendance System for Secondary Schools by expanding and leveraging the district’s adopted access control solution.” The “Use of Funds Plan” describes the project as the “Implementation of a district-wide student badge/tag system to implement tracking and attendance for secondary schools.” The project’s expected outcomes included “improved safety, security, and contact tracing for students while on campus, increased instruction time because teachers would not need to take attendance, 100% of students would be issued an identification card with embedded technology to support contract tracing.”

The three components of the project were safety, security, and attendance. The components of improved safety and security remain. However, the project will not address the component related to attendance and increased instructional time.

In October 2022, it was determined the project should be revised as it did not meet the requirements set by the Texas Education Agency 2023-2024 Student Attendance Accounting Handbook (SAAH). The bid process for the equipment related to the attendance component of the project was halted because utilizing an ID attendance system is not in alignment with the SAAH. The SAAH 3.6 General Attendance-Taking Rules states, "...The only exception to a classroom teacher taking official attendance and the only method by which a student can take his or her own attendance is by using biometric technology." The District plans to use ESSER funds for ID printers, access controls (card readers, video door stations), and door/building numbering for student safety and security.

The Project Lead expects to implement the project and spend the ESSER III funds (allocated to this project) by September 30, 2024.

## Finding 2

The Mental Health Support and College Access Project was not implemented as stated in the "Use of Funds Plan." The ESSER III Dashboard shows the project as "Complete"

The "Use of Funds Plan" shows that project #60 Mental Health Support and College Access had a budget of \$2,429,340. The amended budget in Frontline and the total amount spent on this project was reduced to \$46,775 (2% of the original planned amount). The Project Lead mentioned the project was partially implemented. However, the College Access project shows as "Complete" on the ESSER III Dashboard on the District's website with the description summary: "College students with less than 60 hours will support EPISD students with planning college applications, writing college essays, and applying for financial aid."

Notes in Frontline for reallocations related to this project show that the former Chief Academic Officer requested all fund balances for ESSER Projects under the Academics Department be transferred to Project 59 Learning Loss & Differentiation.

There was no requirement for a formal written process to document the approval and justification for changes/adjustments to the "Use of Funds Plan." However, a plan is required to ensure transparency and accountability in how the District is using the funds to address students' needs. Therefore, it is important the District formally document justifications for changes to show how the project evolved during its implementation and demonstrate the changes were made strategically to support District initiatives.

## Finding 3

The SPED Learning Loss Project has not been evaluated to measure against the expected outcomes outlined in the

Project #65 Special Education Learning Loss is classified as "Complete" on the ESSER III Dashboard maintained by Fund Development. The Project Lead mentioned that an evaluation of the project has not been performed due to the transition in leadership. An evaluation can help determine whether the project succeeded in meeting its purpose and expected outcomes.

The "Use of Funds Plan" shows the project had an original budget of \$6,255,287. The amount spent is \$2,236,577 (approximately 36% of the original budget).

The purpose of the project was to provide a quality, innovative education for students through a continuum of academic and social-emotional services promoting recovery of skills through a systematic approach of instructional and support resources for special education students. The supports would include full



## **“Use of Funds Plan”**

and individual evaluations required under Child Find requirements, related services, technology and instruction resources, and tutorial services during afterschool, intercession, and summer bridge camps.

According to the “Use of Funds Plan,” the specific outcomes of the project were:

1. “To increase attainment of Individualized Education Program (IEP) goals and objectives mastery at 70% or more for each of the district’s special education students by 2023 through the provision of a service continuum model that supports student academic achievement and functional performance outcomes.”
2. “Increase the amount of certified sign language interpreters employed by the District by 50% or more from the current number of certified interpreters employed by 2023 providing interpreting services per IEP for students who are Deaf/Hard of Hearing.”

## **Finding 4**

There is a lag in the implementation of the Planetarium project

The implementation of Project #99 Planetarium has lagged. The funding of \$560,000 for the Planetarium project was originally included in the 2020-2022 ESSER II grant application in October of 2021.

The project was not included in the original ESSER III grant application but was added with a grant amendment submitted on June 26, 2023. The project was added to the ESSER III Dashboard. The ESSER III grant application budget shows \$560,000 was allocated for the Planetarium project to reinforce Texas Essential Knowledge and Skills (TEKS)-aligned science concepts with projector software, digital shows, and a digital wall. The amount spent for the Planetarium with ESSER III is \$70,000 (approximately 12.5% of the project budget). The project has a balance of \$490,000.

Some of the causes of the lag are due to miscommunication and misunderstanding the Project Lead experienced during the procurement process in the areas of contract approval, and requesting and using quotes.

The original project for the Planetarium included a digital wall. The request for proposal for the interactive digital wall was issued on March 28, 2023, with vendor responses due by May 2, 2023. The responses did not fall within the amount budgeted and the bid was not awarded. On August 31, 2023, the Project Lead indicated they would not be issuing a revised bid for the digital wall. The project was revised to purchase interactive boards. Quotes for the interactive boards were obtained. However, these quotes expired, and the Project Lead is working with the Information Technology Department on getting new quotes to purchase the equipment.

The project is active (in progress). The Project Lead indicated that the timeline for purchasing the interactive boards is dependent on obtaining the quotes for the equipment.

## **Observation 1**

Project #72 EL Tutor (Elementary) and Project #86 Content Learning Centers for Secondary were not implemented. Both projects are classified as “Closed” in the District’s ESSER III Dashboard maintained by Fund Development.

There was no requirement for a formal written process to document the approval and justification for not implementing projects. However, it is important the District

formally document justifications for changes to show how projects evolved and demonstrate the changes were made strategically to support District initiatives.

The Project Lead mentioned the projects were not implemented because of the challenges encountered at the time due to the pandemic with hiring qualified teachers and tutors. The market for tutors was high because other districts in the region were also recruiting.

The purpose of the two aforementioned projects is listed below:

#72 EL Tutor Project – Elementary

The purpose of the project was to hire tutors who could either be certified teachers and/or undergrad tutors to provide support and work with Math and Reading teachers to strengthen first-teach instruction as well as response to intervention (RTI) activities. Additional tutors would allow for smaller groups and to provide individual assistance to students. The goal of the project was to reduce the learning loss impact by the end of the 2021-2022 school year, and the focus was to remain an ongoing priority through 2022-2023. The outcome intended was to close learning gaps experienced by English Learners in Math and Reading.

According to the “Use of Funds Plan,” the budget allocated to the project was \$6,207,260.

#86 Content Learning Centers for Secondary

The purpose of the project was for the Content Learning Centers (CLC) to address learning loss due to pandemic closure. The CLC teachers would provide accelerated instruction support by hiring certified reading and math teachers to assist secondary feeder patterns. Classroom and CLC teachers would work collaboratively to provide RTI, close gaps, and individualize instruction.

According to the “Use of Funds Plan,” the budget allocated to the project was \$15,945,000.

## General Recommendations and Management’s Response

We recommend Fund Development:

1. Continue with the development of a plan on how the District will spend project balances (remaining ESSER III funds). We recommend Fund Development keep documentation to support how the plan was developed, including rationale, project budget allocations, and approvals.

**Management and Leadership Response:** Concurred with the recommendation and incorporated into the CAP as activity one (1) which reads, “The Fund Development Department in collaboration with Executive Cabinet will finalize the ESSER III close out strategy for all active ESSER III projects.”

**Person(s) Responsible:** Fund Development and Education Foundation Officer, Fund Development Assistant Director, and Fund Development Coordinators.

**Implementation Date:** 07/01/2024

2. Update the ESSER III Dashboard on the District's webpage with the actual information about the ESSER III projects, including purpose, funding, and progress. This information should be clearly defined and easily understood, cognizant of the District's commitment to transparency and accountability. If a project is revised or not implemented, it should be clearly stated, and if a project is added, it should be added as such.

In addition, Fund Development should work with project leads to document the justification for projects that (i) were not implemented, (ii) had changes in purpose, and (iii) had budget changes for potential future external audits. The information and documentation compiled by Fund Development should also be used to ensure the ESSER III Dashboard reflects actual project implementation. For example, the ESSER III Dashboard should show changes in the (i) project purpose (e.g., the Student Attendance Tracking System), (ii) budget, (iii) implementation status ("Closed" = "Not Implemented"), and (iv) outcomes/evaluation results.

**Management and Leadership Response:** Concurred with the recommendation and incorporated into the CAP as activity two (2) which reads, "Fund Development will coordinate with the Analytics department to update the public facing ESSER III dashboard. Updates will reflect changes made to ESSER projects providing descriptions and justifications for adjustments, modifications, closures, and funding transfers."

**Person(s) Responsible:** Fund Development Assistant Director and Fund Development Coordinators.

**Implementation Date:** 10/01/2024

3. Ensure TEA "Department of Grant Compliance and Administration Justification/Documentation of Allowable Use of ESSER Funds" forms exist and are up to date for each project. The TEA requires these forms to be maintained at the local level for audit and monitoring purposes. For example, the form for Project #2 Student Attendance Tracking System needs to be updated to show only the safety and security components will be addressed.

**Management and Leadership Response:** Concurred with the recommendation and incorporated into the CAP as activity three (3) which reads, "Fund Development will compile all Texas Education Agency (TEA) "Department of Grant Compliance and Administration Justification/Documentation of Allowable Use of ESSER Funds forms" and catalogue them into the El Paso ISD Sharepoint system, available if requested by TEA and external auditors."

**Person(s) Responsible:** Fund Development and Education Foundation Officer, SPAA, Fund Development Assistant Director, and Fund Development Coordinators.

**Implementation Date:** 10/01/2024

4. For future projects, should create grant management materials with resources and tips for project leads in the following areas to ensure projects are implemented and timelines are met:
  - a. Budget management – how to determine the funds allocated to the project, funds spent, and balance so project leads can make informed decisions

when implementing their projects and utilize the funds for the maximum benefit of students.

- b. Developing and maintaining supporting documentation – how to document changes in project implementation. For example, changes in purpose, outcomes, and/or budget allocated.
- c. Procurement process – location of existing procurement resources available, including, but not limited to, how to obtain quotes and contract approval.
- d. Timelines – location of documentation showing the grant's period of availability and any changes to the timeline so they can plan accordingly when implementing the project.
- e. Project evaluation – importance of performing an evaluation to determine if the project's expected outcomes were achieved, how to identify the data needed for the evaluation, and how it will be captured, monitored, and reported.

**Management and Leadership Response:** Concurred with the recommendation and incorporated into the CAP as activity four (4) which reads, "For future grant funded projects. Fund Development will create grant management resources for project leads to ensure projects are implemented and timelines are met."

**Person(s) Responsible:** Fund Development Coordinators

**Implementation Date:** 10/01/2024

- 5. In collaboration with project leads, should ensure evaluations are performed for projects classified as "Complete" to determine the outcomes of the funds spent (e.g., Project #65 SPED Learning Loss). Supporting documentation of the evaluation should be retained.

**Management and Leadership Response:** Concurred with the recommendation and incorporated into the CAP as activity five (5) which reads, "Reflective evaluations will be performed for the projects classified as "Complete" to determine the outcomes of the funds spent."

**Person(s) Responsible:** Director Strategic Planning and Program Evaluation

**Implementation Date:** 12/16/2025

- 6. In collaboration with the Executive Director College and Career Readiness Innovation and the Project Lead, should work to develop a project implementation plan to ensure Project #99 Planetarium is completed and funds are spent by September 30, 2024.

**Management and Leadership Response:** Concurred with the recommendation and incorporated into the CAP as activity one (1) which reads, "The Fund Development Department in collaboration with Executive Cabinet will finalize the ESSER III close out strategy for all active ESSER III projects."

**Person(s) Responsible:** Fund Development and Education Foundation Officer, Fund Development Assistant Director, and Fund Development Coordinators.

**Implementation Date:** 07/01/2024



# Appendix A: Background and Methodology

ASSURANCE • INSIGHT • OBJECTIVITY

## Background

The Elementary and Secondary School Emergency Relief (ESSER) Audit was approved by the Board of Trustees as part of the 2023-2024 Internal Audit Plan. The audit objectives for this audit align with the EPISD Strategic Blueprint Lever IV, Essential Action 3 (culture of Accountability – Continue to be an accountable entity that is fiscally responsible, efficient in its use of resources, and strives for transparency with public-facing information).



The ESSER Audit provides an independent and objective risk-based assessment of the use of grant funds. The specific audit objectives are included in the [Objectives and Scope](#) section of this report.

The ESSER III is one of the three (3) different legislative acts the United States Congress allocated to K-12 public education in response to the COVID-19 pandemic. In 2021, the American Rescue Plan (ARP) Act provided \$122 billion for ESSER III. The funds were passed through the states and to the education agencies to allocate to school districts based on federal guidelines.

The ESSER III grant totaling \$190,723,543 was awarded to the District. The grant required the District to engage in meaningful consultation with a wide range of stakeholders, including the public, students, families, etc. This would give stakeholders an opportunity to provide input in the development of the “Use of Funds Plan.” In addition, a minimum of 20% of grant funds had to be used for evidence-based interventions for learning loss and ensure interventions respond to students’ academic, social, and emotional needs.

The District developed a Use of ESSER III Funds Plan ([ESSER III Workbook Manual](#)) with 51 projects as “a guide to outline the strategy behind The El Paso Independent School District’s approach to utilizing available Elementary Secondary Schools Emergency Relief Funding (ESSER III).”

The publication of the “Use of Funds Plan” submitted to the Texas Education Agency (TEA) is required of all school districts in Texas. According to the Department of Education:

- The Local Education Agency (LEA) plans “are necessary to ensure transparency and accountability for use of the funds... the public and in particular students, their families, and educators, have a vested interest in



understanding an LEA's priorities and plans for the funds and whether and how the LEA will use the funds to address their students' academic, social, emotional, and mental health needs."

- "The minimum requirements for the ARP ESSER plans ensure that LEAs are using ARP ESSER funds for their intended purposes, including whether and how they will use the funds specifically for COVID-19 prevention and mitigation strategies, how the funds will be used to address the academic impact of lost instructional time through the implementation of evidence-based interventions...."

The Federal State Programs and Fund Development Department (Fund Development) coordinated the efforts to submit the ESSER III grant application. This included obtaining needs assessments, researching cost estimates, developing project descriptions, getting approval from leadership, submitting the ESSER grant application for review to cabinet, and obtaining Board approval prior to submission. The department is also monitoring the implementation of the projects.

The Project Leads for each project in the "Use of Funds Plan" were responsible for facilitating the implementation of the projects. The Budget & External Financial Management Office created the project accounts in Frontline Education (the District's enterprise resource planning system).

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## Methodology

To achieve our audit objective(s), we:

1. Researched relevant federal/state laws and regulations.
2. Performed interviews with the Project Leads to obtain an understanding of the ESSER III grant administrative and monitoring functions, operations, processes, and controls in place.
3. Performed a risk assessment based on our understanding of ESSER III processes and controls in place.
4. Selected a representative sample of eight (8) projects based on our sampling procedures for the tests performed. Performed a risk analysis based on the budget amount, not on track for spending timelines and implementing the project, reallocated funds, and project category.
5. Tested the sample of eight (8) projects to determine:
  - a. Whether a project was implemented, not implemented, completed, or in progress.
  - b. Project budget allocations, reallocations, and related approvals.
  - c. The existence of supporting documentation that the project's intended specific changes or outcomes in the "Use of Funds Plan" were evaluated.
  - d. Whether there was evidence of monitoring for the ESSER III project funds so they are spent timely and in their entirety. We reviewed the monitoring

by both Fund Development and the Project Leads to make said determination.

- e. Whether a minimum of 20% of the ESSER III funds was spent on learning loss projects as required by the United States Department of Education.

Because of the inherent limitations in a system of internal controls, there is a risk that errors or irregularities occurred and were not detected. Due professional care requires the internal auditor to conduct examinations and verifications to a reasonable extent. Accordingly, an auditor is able to obtain reasonable, but not absolute, assurance that noncompliance or irregularities do not exist.



# Appendix B: ESSER III - Project Budgets in the “Use of Funds Plan”

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The table below shows the original projects in the “Use of Funds Plan” and the projects that were added. It includes the budget per the “Use of Funds Plan,” the amended budget, and the balance per the ESSER III Dashboard as of November 8, 2023, for each project.

Projects Combined

Projects Added

Project #	Project Title	Status	Category	Original Budget per “Use of Funds Plan”	ESSER III Dashboard Amended Budget as of 11/8/2023	ESSER III Dashboard Balance as of 11/8/2023
6	Teacher	Complete	Technology	\$ 9,000,000.00		
36	Laptops for PEIMS	Complete	Technology	\$ 84,000.00		
95	Alpha Laptops	Complete	Technology	\$ 21,000.00	\$ 6,266,006.13	\$ 39,000.00
65	Special Education Learning Loss	Complete	Learning Loss	\$ 6,255,287.00	\$ 2,188,100.71	\$ (48,475.71)
55	Tutors / THills	Complete	Learning Loss	\$ 5,378,590.00	\$ 12,851,711.27	\$ 55,304.24
1	Student Device Refresh (FY23/24)	Complete	Learning Loss	\$ 4,475,000.00		
49	Wifi Internet Expansion	Complete	Learning Loss	\$ 3,250,000.00		
7	Laptop Lease Payment	Complete	Learning Loss	\$ 1,444,000.00	\$ 8,891,046.68	\$ 97,126.93
60	College Access	Complete	SEL	\$ 2,429,340.00	\$ 46,774.81	\$ -
76	Summer / Intersession enrichment	Complete	Learning Loss	\$ 1,500,000.00	\$ 645,959.24	\$ -
96	School Supplies	Complete	Learning Loss	\$ 825,000.00	\$ 3,706,954.12	\$ -
53	Technology Repair Waiver Program	Complete	Learning Loss	\$ 550,000.00	\$ 300,000.00	\$ 0.38
58	Credit Recovery - Face to Face	Complete	Learning Loss	\$ 432,000.00	\$ 115,374.66	\$ -
28	Additional PPE	Complete	Safe Facilities	\$ 214,823.04	\$ 256,103.00	\$ (0.30)
51	Care backpacks with school supplies and hygiene and clothing items	Complete	SEL	\$ 200,000.00	\$ 67,402.75	\$ -
79	Health Services	Complete	Safe Facilities	\$ 103,098.50	\$ 411,694.92	\$ 236,908.84
94	Speech & Debate Summer Bridge	Complete	Learning Loss	\$ 100,000.00	\$ 51,845.98	\$ 1,483.22
89	Technology for Students' Learning Recoupment in Deaf Education/VI Services	Complete	Learning Loss	\$ 82,000.00	\$ 45,358.15	\$ -
98	High Impact Instructors (Subs)	Complete	Learning Loss	\$ -	\$ 4,013,843.16	\$ -
8	HVAC conversion in high occupancy areas (gyms, cafeterias)	Active	Safe Facilities	\$ 43,253,754.86	\$ 47,129,998.23	\$ 7,608,159.06
66	Retention Stipends (Dec 21, Jun 22, Jun 23) Jun 23: \$12,348,988	Active	Staff Retention	\$ 34,000,000.00	\$ 43,112,160.51	\$ 13,149,498.84
78	Indirect	Active	Indirect	\$ 15,108,052.60	\$ 10,608,365.00	\$ 4,673,062.46
2	Student Attendance Tracking System	Active	Technology	\$ 6,100,000.00	\$ 5,496,565.00	\$ 5,354,773.00
29	Afterschool Community Learning Centers	Active	Learning Loss	\$ 4,000,000.00	\$ 2,570,056.99	\$ 409,093.80
92	Unleashed Creative Minds - K-12 Visual Arts Project	Active	Learning Loss	\$ 2,347,800.00	\$ 1,502,592.00	\$ 51,813.82
59	PD Learning Loss & Differentiation	Active	Learning Loss	\$ 1,900,960.00	\$ 16,446,193.57	\$ 2,394,216.53
12	Custodial supplies and staff for COVID response	Active	Safe Facilities	\$ 1,744,862.00		
14	Surface Disinfection	Active	Safe Facilities	\$ 1,533,000.00	\$ 2,677,877.10	\$ 816,315.93
74	Texas Reading Academies PD & Completion extra duty pay	Active	Learning Loss	\$ 1,710,514.00	\$ 833,002.01	\$ 79,622.09
62	Moving for a Healthy Mind - Students	Active	Learning Loss	\$ 1,699,200.00	\$ 1,104,197.00	\$ 284,837.49
33	Building a Positive Culture - Staff PD	Active	SEL	\$ 1,500,000.00	\$ 371,914.56	\$ 191,747.87
10	Water fountain replacement (with bottle fillers)	Active	Safe Facilities	\$ 685,000.00	\$ 685,000.00	\$ 112,263.40
34	Organizational Culture & Retention	Active	SEL	\$ 600,000.00	\$ 1,577,678.62	\$ 243,795.97
81	Employee Wellbeing	Active	SEL	\$ 500,000.00	\$ 183,918.51	\$ 30,868.51
82	Fine Arts Accelerated Learning	Active	Learning Loss	\$ 487,200.00	\$ 1,099,869.09	\$ 602,801.21
70	Project Oversight	Active	Project Oversight	\$ 443,954.00		
97	External Evaluation	Active	Project Oversight	\$ 50,000.00	\$ 1,937,009.58	\$ 1,671,016.24
5	Expand district data storage and collection solution	Active	Technology	\$ 300,000.00		
4	Data Collection Infrastructure	Active	Technology	\$ 100,000.00	\$ 568,968.85	\$ 568,968.85
99	Planetarium	Active	Learning Loss	\$ -	\$ 560,000.00	\$ 560,000.00
101	Teacher salaries FY24	Active	Learning Loss	\$ -	\$ 12,400,000.00	\$ 9,092,973.42
86	Content Learning Centers for Secondary	Closed	Learning Loss	\$ 15,945,000.00	\$ -	\$ -
72	EL Tutor Project - Elementary	Closed	Learning Loss	\$ 6,207,260.00	\$ -	\$ -
9	UV Lighting & Air Filtration (as component of current LED conversion RFQ)	Closed	Safe Facilities	\$ 6,000,000.00	\$ -	\$ -
64	Wrap Around Support Services	Closed	SEL	\$ 2,160,000.00	\$ -	\$ -
69	School Leadership Staffing	Closed	Learning Loss	\$ 1,969,600.00	\$ -	\$ -
84	ELL Professional Development	Closed	Learning Loss	\$ 829,200.00	\$ -	\$ -
91	Boost Center	Closed	Learning Loss	\$ 800,000.00	\$ -	\$ -
83	EL Tutor Project (Secondary)	Closed	Learning Loss	\$ 629,000.00	\$ -	\$ -
68	Student Mental Health / Wellbeing Referrals	Closed	SEL	\$ 500,000.00	\$ -	\$ -
20	Food service physical distancing: Digital Menu Boards & outdoor seating	Closed	Safe Facilities	\$ 469,000.00	\$ -	\$ -
85	ELL Parent Engagement - Secondary	Closed	Learning Loss	\$ 374,000.00	\$ -	\$ -
88	Advancement Via Individual Determination (AVID) for ELL	Closed	Learning Loss	\$ 248,000.00	\$ -	\$ (3,172.39)
87	Parental Engagement Project (Elementary)	Closed	Learning Loss	\$ 122,450.00	\$ -	\$ -
100	Student attendance engagement solution	Closed	Technology	\$ -	\$ -	\$ -
<b>Totals</b>				\$ 190,661,946.00	\$ 190,723,542.20	\$ 48,274,003.70



## **El Paso ISD Board**

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## **Internal Audit**

Assurance | Insight | Objectivity

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Phone: 915-230-2743

[audit@episd.org](mailto:audit@episd.org)

Fraud, Waste, and Abuse Hotline:

<https://www.reportlineweb.com/EPISD> or (800) 620-8591