



August, 2024

James RunningFisher Board Chairperson  
Rebecca Rappold, Superintendent  
Browning High School  
PO Box 610  
Browning, MT 59417

**RE: Notice of “High-Risk Designation for Browning High School**

Dear Superintendent Rappold and Chairperson RunningFisher:

The Office of Public Instruction (OPI) receives federal grants and distributes these funds to Montana school districts. By taking on this role, the OPI is required by regulation to assess the risk of noncompliance with federal regulations in each school district. When the OPI determines the risk is high for a district, the OPI is obligated to take mitigating steps.

Thus, the purpose of this letter is to notify district officials that Browning Public High School District has been designated as high risk.

This letter outlines:

1. The risk evaluation process.
2. The reasons for the high-risk designation.
3. The conditions being imposed on the district's grant awards because of the designation.
4. The circumstances under which the high-risk designation can be removed.

**Risk Evaluation:**

The OPI evaluates risk indicators on two key items to determine if any districts should be designated as “high risk.” The two key items are:

- School district audits conducted by external contracted auditors; and
- Subrecipient monitoring conducted by the OPI Federal Program managers.

For more information about how the risk score is determined, please visit this [link](#) for the Montana State and Federal Grants Handbook Section 600 pages 89-91.

**OPI Determination:** The OPI has designated your district as “high-risk” for monitoring purposes for specific federal programs based on the following:

1. **Program Risk Determination** is high for federal programs:
  - a. Carl Perkins, IDEA Part B, IDEA ARP B, and ESSER

2. **Program Assurances** has not been met for federal programs:
  - a. ESSER
3. **Fiscal Program Performance** has not been met for federal programs:
  - a. Carl Perkins, IDEA Part B, IDEA ARP B, and ESSER
4. **Reporting Timeliness** has not been met for federal programs:
  - a. Carl Perkins and ESSER
5. **Academic Performance:** Browning High School is currently identified as a Rigorous Action School
6. **Finance Fiscal Audit** from the finance department at the OPI is showing Browning High School as “high risk”

**Special Conditions and Requirements as a result of the high-risk designation:**

1. The district will be placed on full reimbursement status for all grant funds.
2. The district will undergo a Title I, Part A self-assessment and onsite monitoring.
3. The district will demonstrate that all special education teachers are properly licensed, and that training has been provided to SPED staff.
4. The district must make regular drawdowns of IDEA Preschool/ARP funds.
5. The district will report school discipline data during the required timelines.
6. The district must spend down ESSER II funding by submitting monthly cash draws by the 25<sup>th</sup> of each month.
7. The district must comply with audit regulations by ensuring that all audits are submitted (FY21-FY23).

Prior to the submission of claims, the district will need to contact the appropriate OPI program accountant or Deann Willcutt at (406)444-2563 or [Deann.Willcutt@mt.gov](mailto:Deann.Willcutt@mt.gov) for assistance.

**Purpose of Conditions and Requirements:**

The purpose of these additional conditions and requirements is to enable the OPI to monitor the district’s compliance with federal and state regulations, to help the district overcome longstanding financial difficulties, and to encourage the district to establish financial and administrative systems that will allow the school to operate effectively in the future.

The district must comply with the requirements of high-risk status included in this letter to continue participating in federal and state grant programs administered by the OPI. The School Board Trustees will oversee and authorize the corrective actions and improvements and be prepared to provide documentation of the progress for each finding to the OPI auditor if and/or when requested.

**How Conditions and Requirements will be Removed:**

The additional conditions and requirements of high-risk status are in effect until removed by written notice from OPI. Based on improvements made, OPI may remove applicable special conditions. The district will be required to adhere to the special conditions until written notification of release or receipt of a new high-risk designation letter.

**Process for Appeal:**

If the Board believes these actions are not appropriate, have been imposed in error, or have been reconciled, the Board may request reconsideration of the conditions and requirements in this letter by following the "Complaints and Hearings" processes listed in the Montana [\\*Montana State and Federal Grants Handbook](#) (mt.gov) pages 92-94.

If you need technical assistance you can find the OPI directory [here](#). You may also contact Amanda Zigan, OPI School Finance Auditor at (406)444-3096 if you have any questions.

Respectively,

A handwritten signature in black ink that reads "Elsie Arntzen". The signature is written in a cursive style with a large initial "E".

Elsie Arntzen, Superintendent

Montana Office of Public Instruction

Cc:

April Grady, OPI CFO  
Julie Murgel, OPI CPO  
Carrie Kouba, I & E Senior Manager  
Deann Wilcut, CSD Senior Manager  
Sandra Rivas, Business Clerk