

Office of the State Superintendent of Education
Division of Elementary, Secondary, and Specialized Education



Monitoring Guidance for Federal Grants

Fall 2016

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DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

September 20, 2016

Dear LEA leader,

As the state education agency for the District of Columbia, the Office of the State Superintendent (OSSE) is responsible for monitoring sub-recipients of federal grants to ensure compliance with local and federal laws and regulations. Historically, each grant program within OSSE has maintained individual program specific monitoring systems and conducted on-site monitoring visits independent of each other. Last year, in an effort to streamline state-level monitoring efforts and reduce burden on local education agencies (LEAs), OSSE's division of Elementary, Secondary, and Specialized Education moved to a coordinated, risk-based monitoring approach.

Our efforts are aligned with a renewed federal emphasis to reorganize in order to accomplish the following goals:

- *Focus on What Matters*: Ensure smart use of resources and time to help LEAs make progress and provide high quality instruction to all students;
- *Reduce Burden on LEAs*: Combine and streamline performance review protocols and prevent duplication of data requests;
- *Improve Communication with LEAs*: Strengthen the partnership between OSSE and LEAs through inviting input into, and requesting continuous feedback of, the OSSE performance review system;
- *Differentiate and Customize our Support for LEAs*: Use a risk-based review system that helps shift from a one size fits all approach to one that affords maximum flexibility for high performing LEAs and provides tailored support based on indicated need; and
- *Ensure Basic Requirements are Met*: Ensure regular review of fiscal performance to safeguard public funds from waste, fraud, and abuse.

This year, the following grant programs will be included in our division's coordinated risk-based monitoring activities. Please note that over course of the 2016-17 school year, OSSE is working to transition LEA grant requirements to the requirements of the Every Student Succeeds Act (ESSA), which reauthorizes of the Elementary and Secondary Education Act (ESEA). States and LEAs are required to fully implement ESSA in the 2017-18 school year. OSSE's monitoring tools and guidelines will be updated accordingly to reflect such changes for future monitoring cycles.

- Elementary and Secondary Education Act, as amended (ESEA), Title I, Part A: Improving Basic Programs Operated by Local Education Agencies
- ESEA, Title I, Part A: Schoolwide Programs
- ESEA, Title I, Part A: 1003(a) School Improvement Fund

- ESEA, Title I, Part A: 1003(g) School Improvement Grants (SIG)
- ESEA, Title II, Part A: Teacher and Principal Training and Recruiting Fund
- ESEA Title III, Part A: English Language Acquisition, Language Enhancement and Academic Achievement Program for English Learners
- ESEA, Title V, Part B: Charter Schools Program
- ESEA, Title X, Part C: McKinney-Vento Homeless Assistance Act Grant
- Scholarships for Opportunity and Results Act (SOAR)
- Individuals with Disabilities Education Act (IDEA), Part B

ESSE LEA Risk Matrix

ESSE has developed a risk matrix to determine the schedule and scope of the monitoring applicable LEAs will receive during the 2016-17 school year. The type of monitoring a LEA will receive will vary depending on its designation as a high, medium, or low risk sub-grantee. Each LEA will be assigned a risk level based on the following criteria:

- A-133 single audit results
- High grant award totals
- Excess carryover or failure to liquidate funds
- Results of any IDEA complaints filed against the LEA
- ESEA Accountability status of the LEA's schools (i.e., Focus and/or Priority)
- IDEA Part B determination level (i.e., Needs Assistance or Needs Intervention)
- Unresolved noncompliance from previous monitoring reviews
- Additional concerns raised by individual grant managers
- Dates of most recent on-site monitoring visits

As a result of applying these risk criteria to each LEA, OSSE will notify each LEA of its risk level. LEAs will receive either no monitoring, desktop monitoring, or an on-site visit based on their designation. This process is in accordance with OSSE's Monitoring Policy, which can be found in the Appendix of this document.

Coordinated On-Site Monitoring

LEAs which receive a designation of high risk will be notified that they have been identified to receive an on-site monitoring visit. The monitoring team will notify LEAs of an on-site monitoring visit at least four weeks prior to the visit. These visits will be scheduled with consideration given to the statewide assessment windows.

Our division will conduct coordinated on-site monitoring visits during which all relevant grant programs will conduct a simultaneous visit as a single team. All communications to LEAs regarding the on-site monitoring visit will be coordinated across the grant programs listed above, including the initial notification of the on-site visit and pre-site preparation activities.

Desktop Monitoring

LEAs which receive a designation of medium risk may be identified to receive fiscal desktop monitoring for one or more grant categories. LEAs subject to desktop monitoring will receive notice four weeks in advance.

Nonpublic School Monitoring

For LEAs that have students attending nonpublic schools, OSSE will continue to conduct IDEA Part B desktop reviews of students' educational files. Charter LEAs will be assigned to have their files reviewed in January or April 2017, with notification taking place four weeks in advance. OSSE's IDEA Part B desktop review of the District of Columbia Public Schools' nonpublic files will take place in October 2016, January 2017, and April 2017.

If you have questions regarding the risk-based monitoring process, please contact Ms. Sharon Gaskins, Deputy Assistant Superintendent, at Sharon.Gaskins@dc.gov. For questions regarding nonpublic school monitoring, please contact Dr. Edgar Stewart at Edgar.Stewart@dc.gov.

Thank you for your cooperation and continued work to improve results for District of Columbia students.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy Maisterra', with a long horizontal flourish extending to the right.

Amy Maisterra
Assistant Superintendent
Division of Elementary, Secondary, and Specialized Education

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Monitoring Process Overview

The goal of the Office of the State Superintendent of Education's (OSSE) Division of Elementary, Secondary, and Specialized Education's (ESSE) risk-based monitoring process is to ensure that local education agencies (LEAs) meet the requirements of both federal and local laws and regulations. In alignment with federal regulations and OSSE's Monitoring Policy issued Oct. 2014, ESSE's monitoring approach is risk-based and outcome oriented.

The purpose of these guidelines is to provide LEA leaders guidance on ESSE's risk-based monitoring process in order to support their planning and implementation efforts over the upcoming 2016-17 year.

I. COMPLIANCE MONITORING

Each year, ESSE will conduct on-site and desktop compliance monitoring for a select group of LEAs based on a calculation of risk as aligned with OSSE's monitoring policy. This process will include record reviews, document reviews, and interviews to identify noncompliance and to assess progress toward federal and local targets. ESSE's risk-based monitoring will take two forms: 1) On-site monitoring and 2) Desktop monitoring.

a. On-Site Monitoring

LEA on-site monitoring is a process by which selected LEAs receive an on-site visit by ESSE's Coordinated Monitoring Team for a comprehensive document and record review, stakeholder interviews, fiscal examination and follow-up technical assistance, if needed. The process is designed to identify noncompliance in order to assist LEAs in making progress toward improving educational results and functional outcomes for all students. On-site compliance monitoring also allows ESSE to determine if SEA-implemented strategies have resulted in qualitative and quantitative improvements, and to formulate specific, tailored actions if improved outcomes have not been achieved.

On-site monitoring will follow a series of defined steps for the 2016-2017 year:

- 1) Identification for monitoring
- 2) Notification of monitoring selection
- 3) Pre-site activities: Pre-site documentation submission and site visit and/or phone conference

- 4) On-site monitoring visit and activities
- 5) Monitoring report issued (within 90 days of visit)
- 6) Correction of noncompliance
- 7) Verification of correction of noncompliance
- 8) Closure of findings of noncompliance

Step 1: Identification for Monitoring

ESSE will consider the following risk-assessment criteria when determining the monitoring rotation and focus areas for LEAs. *Please note that other program-specific criteria may also be considered at the discretion of the respective grant manager.*

- Results from A-133 audit and/or charter financial review
- High grant award totals
- Failure to drawdown grant funds
- Findings resulting from any IDEA complaints filed against the LEA
- Elementary and Secondary Education Act (ESEA) Priority and Focus school status
- Individuals with Disabilities Education Act (IDEA), Part B Determination levels
- Unresolved noncompliance
- Length of time since last monitoring
- Other concerns:
 - Late reporting (e.g. expenditures, status reports, progress reports)
 - Failure to submit required data
 - Failure to adhere to terms and conditions set forth in the Grant Award Notice (GAN)
 - Grant funds withheld or revoked

Step 2: Notification of Monitoring Selection

LEA leaders will be notified by electronic mail of their selection for monitoring at least four weeks in advance of the proposed monitoring visit. The letter will include:

- The purpose of the visit and planned activities
- The proposed dates the LEA's submission of pre-site documentation
- The proposed date for the pre-site visit meeting or phone conference
- The proposed date for the on-site visit

LEAs are expected to plan as soon as possible for the on-site monitoring visit. For example, as soon as possible after notification of the visit, LEAs should plan for the accommodations and time needed for staff, family and student interviews, and for ESSE record reviews, as requested.

Step 3: Pre-site Activities

LEAs will be provided a Pre-Site Documentation Checklist that will outline the documents that must be submitted prior to the monitoring activity. LEAs are encouraged to contact their points of contact for any questions regarding the checklist, or documentation that will be required.

The pre-site visit meeting or phone conference is an opportunity for LEA and ESSE staff to discuss the purpose of the on-site visit, confer about the agenda for the on-site visit, agree on logistics, and discuss any questions related to the Pre-Visit Document Collection Checklist. It is also an opportunity for the LEA to ask any questions regarding the visit.

Step 4: On-site Monitoring Visit and Activities

Following its notification letter to each selected LEA and the subsequent pre-site visit meeting or phone conference, ESSE will conduct an on-site visit to each LEA. The on-site review is designed to determine if the LEA's program and services are compliant with local and federal regulations. If an LEA has more than one campus or school, ESSE may conduct its on-site visit at multiple locations. Regardless of the number of locations ESSE chooses to visit, only one monitoring report will be issued to the LEA.

During the on-site visit, ESSE will engage in the following activities:

- *Staff Interviews:* ESSE may interview LEA or school administrators, general education teachers, special education coordinator, special education teachers, related service providers and the budget director. Interview questions align with the monitoring standards and will be used to triangulate data gathered from other monitoring activities.
- *Student Interviews:* ESSE may choose to interview students to better understand compliance and performance in the LEA. In some cases, students may be selected by ESSE according to specific information. The LEA will be informed in advance of the names of any students selected by ESSE for an interview. In either case, the LEA is responsible for coordinating the interviews with students. If ESSE selects students who are involved in the Child and Family Services Administration system, incarcerated, in the custody of the Department of Youth Rehabilitation Services and/or receive services through the Department of Mental Health or other District agencies, ESSE will take steps to coordinate its interviews with those agencies. Interview questions align with the monitoring standards and will be used to triangulate data gathered from other monitoring activities.

- *Parent/Family Interviews:* ESSE may choose to interview parents/family of students to better understand compliance and performance in the LEA. In some cases, parents/family of students may be selected by ESSE according to specific information. If ESSE selects parents/family of students who are involved in the Child and Family Services Administration system, incarcerated, in the custody of the Department of Youth Rehabilitation Services and/or receive services through the Department of Mental Health or other District agencies, ESSE will take steps to coordinate its interviews with those agencies. Interview questions align with the monitoring standards and will be used to triangulate data gathered from other monitoring activities.
- *Classroom Observations:* ESSE may observe classrooms or lessons in which students are being educated. The purpose of the observations is to gain a better understanding of how instruction or support services are delivered within the LEA. Data collected through classroom/lesson observation will be used to triangulate data gathered from other monitoring activities. Findings of noncompliance will not be made based solely on observations.
- *Fiscal Monitoring Activities:* Fiscal monitoring includes document and record reviews, interviews and/or a demonstration of financial processes and systems. Items to be assessed can be found in the fiscal section of the compliance monitoring tool. LEAs will be informed in advance of materials that must be provided.
- *Individual Student-Level Monitoring:* ESSE may choose to conduct individual student-level monitoring. Individual student-level monitoring may consist of interviews with all teachers and service providers associated with the student; interviews with the student (if appropriate) and the student's parent or guardian; and an observation of the classrooms and programs to which the student is assigned. Information and findings regarding the individual student-level monitoring will be included in the on-site compliance monitoring report. LEAs will be informed in advance if individual student-level monitoring will occur during the on-site visit.

Step 5: Monitoring Report Issued

Within ninety (90) days of the on-site visit, ESSE will issue a monitoring report that will provide determinations of compliance, determinations of noncompliance, and recommendations. The monitoring report will also delineate corrective actions and improvement activities necessary for the LEA to correctly implement the specific requirement. These reports will align with items in the compliance monitoring tool and with monitoring standards.

- **Initial Monitoring Report:** ESSE will release a draft Consolidated Monitoring Report summarizing the results of the monitoring visit. Following the release of the draft report, LEAs will have ten business days to review the information and share any additional information that may demonstrate compliance.
- **Final Monitoring Report:** ESSE will release the final report summarizing the results of the monitoring visit fourteen business days after the release of the draft Consolidated Monitoring Report. Because these release procedures provide LEAs with an opportunity to respond to compliance determinations, **ESSE will not accept appeals of monitoring findings after the release of the final monitoring report.** Any documentation submitted after the release of the final monitoring report will be used to demonstrate correction of the identified noncompliance.

Step 6: Correction of Noncompliance

Contained within the monitoring report, ESSE will provide a list of required corrective actions and LEA-level improvement activities for noncompliance. If appropriate, LEAs may also be required to develop a Corrective Action Plan (CAP).

Corrective actions and improvement activities may be relatively uncomplicated and non-time consuming (e.g. correcting a data error) or may be multifaceted and involved (e.g. developing policy and procedures for ensuring appropriate discipline processes). More simple corrective actions or improvement activities may be accomplished by one staff member or through a routine meeting, while more complex corrective actions or improvement activities may require extensive analysis and collaboration with the LEA leadership and/or Boards of Directors.

ESSE is committed to providing technical assistance to LEAs as they address any findings of noncompliance and formulate CAPs. Assistance from grant managers will be available to LEAs as they strive toward correction of noncompliance and improvement of educational results and functional outcomes for students.

Step 7: Verification of Correction of Noncompliance

After the LEA has certified correction of noncompliance, ESSE will verify the correction of noncompliance as required by the related federal grant.

Step 8: Closure of Findings of Noncompliance

The LEA will be notified in writing that the finding of noncompliance is closed. LEAs should continue to conduct reviews of records and activities to identify any areas of need that may arise before future ESSE monitoring activities.

b. Desktop Monitoring

Desktop monitoring is a tiered monitoring approach that could be as specific as a request for documentation supporting a single reimbursement request or as expansive as a request for a series of quarterly reports or supporting documentation across the grant period. For the 2016-17 year, ESSE's desktop monitoring will include a fiscal review only. LEAs that participate in desktop monitoring will be required to submit evidence of program implementation and program administration documents for review. Any LEA selected for desktop monitoring will be provided at least four weeks to compile and submit the requested documentation to ESSE.

Desktop monitoring will follow a series of defined steps for the 2016-2017 year:

- 1) Identification for monitoring
- 2) Notification of monitoring selection
- 3) LEA documentation submission
- 4) Desktop monitoring review
- 5) Monitoring report issued (within 90 days)
- 6) Correction of noncompliance
- 7) Verification of correction of noncompliance
- 8) Closure of findings of noncompliance

Step 1: Identification for Monitoring

ESSE will consider the following risk-assessment criteria when determining the monitoring rotation and focus areas for LEAs. *Please note that other program-specific criteria may also be considered at the discretion of the respective grant manager.*

- Results from A-133 audit and/or charter financial review
- High grant award totals
- Failure to drawdown grant funds
- Findings resulting from any IDEA complaints filed against the LEA
- Elementary and Secondary Education Act (ESEA) Priority and Focus school status
- Individuals with Disabilities Education Act (IDEA), Part B Determination levels
- Unresolved noncompliance
- Length of time since last monitoring
- Other concerns:
 - Late reporting (e.g. expenditures, status reports, progress reports)
 - Failure to submit required data

- Failure to adhere to terms and conditions set forth in the Grant Award Notice (GAN)
- Grant funds withheld or revoked

Step 2: Notification of Desktop Monitoring

LEA leaders will be notified by electronic mail of their selection for desktop monitoring. The letter will include:

- The purpose of the desktop monitoring
- The proposed submission date for required documentation
- A copy of ESSE's monitoring tool
- A single point of contact available for coordinating all aspects of the monitoring activity

Step 3: LEA Documentation Submission

LEAs will be provided a listing of documents that must be submitted as part of the desktop monitoring review. LEAs are encouraged to contact their points of contact for any questions regarding the documentation that may be required.

Step 4: Documentation Review

The ESSE monitoring team will conduct a desk review of fiscal records and policies. The review is designed to determine if the LEA's fiscal practices are compliant with federal and local regulations.

Step 5: Monitoring Report Issued

Within ninety (90) days of the on-site visit, ESSE will issue a monitoring report that will provide determinations of compliance, determinations of noncompliance, and recommendations. The monitoring report will also delineate corrective actions and improvement activities necessary for the LEA to correctly implement the specific requirement. These reports will align with items in the compliance monitoring tool and with monitoring standards.

- *Initial Monitoring Report*: ESSE will release a draft Consolidated Monitoring Report summarizing the results of the monitoring. Following the release of the draft report, LEAs will have ten business days to review the information and share any additional information that may demonstrate compliance.
- *Final Monitoring Report*: ESSE will release the final report summarizing the results of the monitoring fourteen business days after the release of the draft Consolidated Monitoring Report. Because these release procedures provide LEAs with an opportunity to respond to compliance determinations, **ESSE will not accept appeals of monitoring findings after the release of the final monitoring report**. Any documentation submitted after the release of the final monitoring report will be used to demonstrate correction of the identified

noncompliance.

Step 6: Correction of Noncompliance

Contained within the monitoring report, ESSE will provide a list of required corrective actions and LEA-level improvement activities for noncompliance. If appropriate, LEAs may also be required to develop a Corrective Action Plan (CAP).

Corrective actions and improvement activities may be relatively uncomplicated and non-time consuming (e.g. correcting a data error) or may be multifaceted and involved (e.g. developing policy and procedures for ensuring appropriate discipline processes). More simple corrective actions or improvement activities may be accomplished by one staff member or through a routine meeting, while more complex corrective actions or improvement activities may require extensive analysis and collaboration with the LEA leadership and/or Boards of Directors.

ESSE is committed to providing technical assistance to LEAs as they address any findings of noncompliance and formulate CAPs. Assistance from grant managers will be available to LEAs as they strive toward correction of noncompliance and improvement of educational results and functional outcomes for students.

Step 7: Verification of Correction of Noncompliance

After the LEA has certified correction of noncompliance, ESSE will verify the correction of noncompliance as required by the related federal grant.

Step 8: Closure of Findings of Noncompliance

The LEA will be notified in writing that the finding of noncompliance is closed. LEAs should continue to conduct reviews of records and activities to identify any areas of need that may arise before future ESSE monitoring activities.

	Tier I Low Risk	Tier II Medium Risk	Tier III High Risk
Selection Methodology	Risk-analysis in all applicable areas.		
Risk Indicators	<ul style="list-style-type: none"> ✓ Failure to drawdown grant funds ✓ Findings resulting from any IDEA complaints filed against the LEA ✓ Elementary and Secondary Education Act (ESEA) Priority and Focus school status ✓ Individuals with Disabilities Education Act (IDEA), Part B Determination levels ✓ Unresolved noncompliance ✓ Length of time since last monitoring ✓ Other concerns (late reporting; failure to submit required data; failure to adhere to terms and conditions set forth in the Grant Award Notice (GAN); grant funds withheld or revoked) 		
Monitoring Experience	<p>No Monitoring Any LEA falling within the low risk tier will not be required to participate in mandatory monitoring activities under the risk-based model.</p>	<p>Desktop Monitoring Desktop monitoring is a tiered monitoring approach that could be as specific as a request for documentation supporting a single reimbursement request or as expansive as a request for a series of quarterly reports or supporting documentation across the grant period. For the 2016-17 year, ESSE's desktop monitoring will include a fiscal review only. Results are compiled into a single Consolidated Monitoring Report, and in some instances a corrective action plan may be required.</p>	<p>On-Site Monitoring On-site monitoring is a process by which selected LEAs receive an on-site visit by ESSE's Coordinated Monitoring Team for a comprehensive document and record review, stakeholder interviews, fiscal examination and follow-up technical assistance, if needed. Results are compiled into a single Consolidated Monitoring Report, and in some instances a corrective action plan may be required.</p>
Pre-Site Conference Required	Not Applicable	May include a phone conference	Yes, either on-site or via phone conference



DISTRICT OF COLUMBIA
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Grant Guidelines

Overview

In 2015-16, the Division of Elementary, Secondary, and Specialized Education (ESSE) began applying a risk-based model for prioritizing the monitoring of local education agencies (LEAs) receiving federal and local grant funds. As a part of ESSE's ongoing commitment to reduce administrative burden on LEAs and improve communication, ESSE has developed guidelines which LEAs may use to better understand key federal and local grant monitoring requirements and considerations when subject to monitoring.

Grant programs included in risk-based monitoring

This year, the following grant programs will be included in our division's coordinated risk-based monitoring activities:

- Elementary and Secondary Education Act, as amended (ESEA), Title I, Part A: Improving Basic Programs Operated by Local Education Agencies
- ESEA, Title I, Part A: Schoolwide Programs
- ESEA, Title I, Part A: 1003(a) School Improvement Funds
- ESEA, Title I, Part A: 1003(g) School Improvement Grants (SIG)
- ESEA, Title II, Part A: Teacher and Principal Training and Recruiting Fund
- ESEA Title III, Part A: English Language Acquisition, Language Enhancement and Academic Achievement Program for English Learners
- ESEA, Title V, Part B: Charter Schools Program
- ESEA, Title X, Part C: McKinney-Vento Homeless Assistance Act Grant
- Scholarships for Opportunity and Results Act (SOAR)
- Individuals with Disabilities Education Act (IDEA), Part B

This grant-by-grant summary provides the following information for each grant:

- Grant Name
- Legal Citation for Grant
- Grant Type
- Grant Purpose
- OSSE Monitoring Requirement
- Annual LEA Reporting Requirements
- Web-Based Resources on Grant Program

- OSSE Contact

Over course of the 2016-17 school year, OSSE is working to transition LEA grant requirements to the requirements of the Every Student Succeeds Act (ESSA), which reauthorizes of the Elementary and Secondary Education Act (ESEA). States and LEAs are required to fully implement ESSA in the 2017-18 school year. These guidelines will be updated accordingly to reflect such changes for future monitoring cycles.

Title I, Part A: Improving the Academic Achievement of the Disadvantaged

Grant Name	Title I – Improving the Academic Achievement of the Disadvantaged
Legal Citation	Elementary and Secondary Education Act of 1965, as amended, Title I, Part A, §§1111-1119, 1121-1122, 1124 – 1127 20 U.S.C. 6301 et seq.
Grant Type	Formula
Grant Purpose	The purpose of this grant is to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging State academic achievement standards and state academic assessments.
OSSE Monitoring Requirement	2 CFR §200.331(d)(1-3): All pass-through entities must: (d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include: (1) Reviewing financial and performance reports required by the pass-through entity. (2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means. (3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by § 200.521 Management decision.
Key LEA reporting requirements	New or Significantly Expanding Public Charter School (NOSEPCS): Notification of the opening or significant expansion of charter schools via submission of the <i>New or Significantly Expanding Public Charter School Notification Form</i> . Maintenance of Effort (DCPS only): Maintenance of Effort refers to the need for each local education agency (LEA), as a condition of receiving funds under any "covered program" (identified in the Elementary and Secondary Act (ESEA) section 9101(13)), to have maintained in the

	<p>previous fiscal year at least 90 percent of the level of State and local expenditures for K-12 education, in the aggregate or on a per-pupil basis, that were expended in the second preceding fiscal year.</p> <p>Comparability Report (DCPS only): As provided in section 1120A(c) of the Elementary and Secondary Act (ESEA), in order for an LEA to demonstrate comparability of services and qualify to receive Title I, Part A funds, it must use State and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds.</p>
<p>Web-Based Resources on Grant Program</p>	<p>U.S. Department of Education website that provides an overview of strategies used to provide a fair and equal opportunity for high-quality education that includes laws, regulations, guidance, and FAQs: http://www2.ed.gov/programs/titleiparta/legislation.html</p> <p>U.S. Department of Education guidance that provides an overview of Schoolwide programs, how to conduct the comprehensive needs assessment and perform a program evaluation/annual review of the programs: http://www2.ed.gov/policy/elsec/guid/designingswpguid.doc</p> <p>U.S. Department of Education guidance that provides an overview of the following topics: Maintenance of Effort, Comparability, Supplement, not Supplant, Carryover, Consolidating funds in schoolwide programs, and Grantback requirements: http://www2.ed.gov/programs/titleiparta/fiscalguid.pdf</p> <p>Guidance that provides an overview of the importance of parental involvement, responsibilities of States, and LEA and school responsibilities: http://files.eric.ed.gov/fulltext/ED484491.pdf</p>
<p>OSSE Contact</p>	<p>Ms. Giana Hutton Program Analyst Strategic Operations Cluster Division of Elementary, Secondary and Specialized Education 202-478-5915 or Giana.Hutton@dc.gov</p> <p>Ms. Mildred Washington Program Analyst Strategic Operations Cluster Division of Elementary, Secondary and Specialized Education 202-724-7870 or Mildred.Washington@dc.gov</p>

Title I, Part A: 1003(a), School Improvement Funds

Grant Name	Title I, 1003(a)
Legal Citation	Elementary and Secondary Education Act of 1965, as amended, Title I, Part A, §1003(a) 20 U.S.C. 6301 et seq.
Grant Type	Formula
Grant Purpose	Title I, 1003(a) provides local education agencies (LEAs) with Priority and Focus schools funding to assist these schools in meeting the progress goals in their school improvement plans with the goal of improving student performance. Rising Priority and Rising Focus schools are not eligible for 1003(a) funds. Priority schools that receive funding via the School Improvement Grant under 1003(g) will not receive an allocation under 1003(a).
OSSE Monitoring Requirement	2 CFR §200.331(d)(1-3): All pass-through entities must: (d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include: (1) Reviewing financial and performance reports required by the pass-through entity. (2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means. (3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by § 200.521 Management decision.
Key LEA reporting requirements	N/A
Web-Based Resources on Grant Program	Participating schools must either align their improvement strategies to the seven turnaround principles for school improvement, or must implement evidence-based practices. Focus schools must implement strategies that address the subject area and subpopulation for which the school was identified.

	<p>Description of the seven turnaround principles for school improvement: http://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/OSSE%2020%20percent%20webinar%20handout.pdf</p> <p>Summary document on evidence-based strategies: http://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/Evidence-Based%20Practices%20in%20Education.pdf</p> <p>Description of Focus school interventions: http://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/OSSE%2020%20percent%20webinar%20handout.pdf</p>
OSSE Contact	<p>Ms. Renu Oliver School Improvement Initiatives Manager Accountability, Performance and Support Cluster Division of Elementary, Secondary and Specialized Education (202) 741-5251 or Renu.Oliver@dc.gov</p>

Title I, Part A: 1003(g), School Improvement Grant

Grant Name	Title I, Part A, School Improvement Grant (SIG)
Legal Citation	Elementary and Secondary Education Act of 1965, as amended, Title I, Part A, §1003(g) 20 U.S.C. 6301 et seq.
Grant Type	Competitive
Grant Purpose	School Improvement Grants are grants to local educational agencies (LEAs) that demonstrate the greatest need for the funds and the strongest commitment to use the funds to provide adequate resources in order to substantially raise the achievement of students in their lowest-performing schools.
OSSE Monitoring Requirement	<p>2 CFR §200.331(d)(1-3):</p> <p>All pass-through entities must:</p> <p>(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:</p> <p>(1) Reviewing financial and performance reports required by the pass-through entity.</p> <p>(2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.</p> <p>(3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by § 200.521 Management decision.</p>
Key LEA reporting requirements	<ul style="list-style-type: none"> • Annual EdFacts reporting for SIG leading indicators • Monthly progress reports
Web-Based Resources on Grant Program	<ul style="list-style-type: none"> • The U.S. Department of Education’s School Improvement Grant website, including the Final Requirements and related guidance: http://www2.ed.gov/programs/sif/index.html

OSSE Contact	Ms. Renu Oliver School Improvement Initiatives Manager Accountability, Performance and Support Cluster Division of Elementary, Secondary and Specialized Education (202) 741-5251 or Renu.Oliver@dc.gov
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Title II, Part A: Preparing, Training, and Recruiting High Quality Teachers and Principals

Grant Name	Title II – Preparing, Training and Recruiting High Quality Teachers and Principals
Legal Citation	Elementary and Secondary Education Act of 1965, as amended, Title II, Part A, §§ 2122-2123 20 U.S.C. 6301 et seq.
Grant Type	Formula
Grant Purpose	<p>The purpose of this part is to provide grants to State educational agencies, local educational agencies, State agencies for higher education, and eligible partnerships in order to:</p> <ul style="list-style-type: none"> (1) increase student academic achievement through strategies such as improving teacher and principal quality and increasing the number of highly qualified teachers in the classroom and highly qualified principals and assistant principals in schools; and (2) hold local educational agencies and schools accountable for improvements in student academic achievement.
OSSE Monitoring Requirement	<p>2 CFR §200.331(d)(1-3)</p> <p>All pass-through entities must:</p> <p>(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:</p> <ul style="list-style-type: none"> (1) Reviewing financial and performance reports required by the pass-through entity. (2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means. (3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by § 200.521 Management decision.

<p>Key LEA reporting requirements</p>	<p>New or Significantly Expanding Public Charter School (NOSEPCS): Notification of the opening or significant expansion of charter schools via submission of the <i>New or Significantly Expanding Public Charter School Notification Form</i>.</p>
<p>Web-Based Resources on Grant Program</p>	<p>U.S. Department of Education website that provides an overview of strategies used to improve teacher and principal quality in addition to laws, regulations, guidance, and FAQs: http://www2.ed.gov/programs/teacherqual/legislation.html</p> <p>U.S. Department of Education guidance that provides an overview of professional development, federal awards, use of funds, and private school participation: http://www2.ed.gov/programs/teacherqual/guidance.doc</p>
<p>OSSE Contact</p>	<p>Ms. Giana Hutton Program Analyst Strategic Operations Cluster Division of Elementary, Secondary and Specialized Education 202-478-5915 or Giana.Hutton@dc.gov</p> <p>Ms. Mildred Washington Program Analyst Strategic Operations Cluster Division of Elementary, Secondary and Specialized Education 202-724-7870 or Mildred.Washington@dc.gov</p>

Title III, Part A: English Language Acquisition, Language Enhancement and Academic Achievement Program for English Learners

Grant Name	Title III – English Language Acquisition, Language Enhancement and Academic Achievement Program for English Learners
Legal Citation	Elementary and Secondary Education Act of 1965, as amended, Title III, §§3111–3141 20 U.S.C. 6821–6871
Grant Type	Formula
Grant Purpose	<p>This program is designed to improve the education of English learners by helping them learn English and meet challenging state academic content and student academic achievement standards. The program also provides enhanced instructional opportunities for immigrant children and youths.</p> <p>Schools use the funds to implement language instruction educational programs designed to help students achieve these standards. Approaches and methodologies used must be based on scientifically based research. LEAs may develop and implement new language instruction programs and expand or enhance existing programs. LEAs also may implement schoolwide programs within individual schools or implement system-wide programs to restructure, reform, or upgrade all programs, activities, or operations related to the education of their English learners.</p>
OSSE Monitoring Requirement	<p>2 CFR §200.331(d)(1-3)</p> <p>All pass-through entities must:</p> <p>(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:</p> <p>(1) Reviewing financial and performance reports required by the pass-through entity.</p> <p>(2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.</p> <p>(3) Issuing a management decision for audit findings pertaining to the Federal</p>

	award provided to the subrecipient from the pass-through entity as required by § 200.521 Management decision.
Key LEA reporting requirements	Bi-annual report to include a summary of student progress in the program
Web-Based Resources on Grant Program	U.S. Department of Education that provides an overview of the supplemental English Language Acquisition state grants, and includes eligibility, non-regulatory guidance, and FAQs: http://www2.ed.gov/programs/sfgp/index.html
OSSE Contact	Ms. Gimari Jones Program Manager Teaching and Learning Cluster Division of Elementary, Secondary and Specialized Education (202) 478-5987 or Gimari.Jones@dc.gov

Title V, Part B: Charter Schools Program (CSP) Grant

Grant Name	Charter Schools Program (CSP) Grant Title V, Part B
Legal Citation	Elementary and Secondary Education Act of 1965, as amended, Title V, Part B, §§5201-5211 20 U.S.C. 7221
Grant Type	Formula (Planning and Implementation Grants) Competitive (Dissemination Grants)
Grant Purpose	The purpose of the Charter School Programs (Title V, Part B) grant is to increase national understanding of the charter school model by: <ul style="list-style-type: none"> • Providing financial assistance for the planning, program design, and initial implementation of charter schools • Evaluating the effects of such schools, including the effects on students, student academic achievement, staff, and parents • Expanding the number of high-quality charter schools available to students across the Nation • Encouraging the States to provide support to charter schools for facilities financing in an amount more nearly commensurate to the amount the States have typically provided for traditional public schools
OSSE Monitoring Requirement	2 CFR §200.331(d)(1-3): All pass-through entities must: (d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include: (1) Reviewing financial and performance reports required by the pass-through entity. (2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means. (3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by § 200.521 Management decision.

Key LEA reporting requirements	Semi-Annual Reports Final Report
Web-Based Resources on Grant Program	U.S. Department of Education’s Charter Schools Program information page, including applicable legislation, regulations and guidance: http://www2.ed.gov/programs/charter/legislation.html OSSE’s Charter Schools Program information page, including lists of awardees and resources for LEAs: http://osse.dc.gov/service/charter-schools-program-planning-and-implementation-grant
OSSE Contact	Ms. Katherine Cox Director, Office of Public Charter School Finance and Support Policy, Planning and Charter Support Cluster Division of Elementary, Secondary and Specialized Education 202-442-3265 or Katherine.Cox@dc.gov

Title X, Part C: McKinney-Vento Homeless Assistance Act Grant

Grant Name	McKinney-Vento Homeless Assistance Act Grant
Legal Citation	Elementary and Secondary Education Act of 1965, as amended, Title X, Part C 42 U.S.C. 11431 et seq.
Grant Type	Competitive
Grant Purpose	The intent of the grant is to: (1) facilitate the enrollment, attendance, and success in school of homeless children and youth; and (2) ensure homeless children and youth have equal access to the same free, appropriate, public education as provided to all other students. Services provided cannot replace the regular academic program and must be designed to expand or improve services that are part of the school's regular academic program.
OSSE Monitoring Requirement	<p>2 CFR §200.331(d)(1-3):</p> <p>All pass-through entities must:</p> <p>(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:</p> <p>(1) Reviewing financial and performance reports required by the pass-through entity.</p> <p>(2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.</p> <p>(3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by § 200.521 Management decision.</p> <p>Note: Some requirements of this Act apply to all LEAs including those who have not received a subgrant under this Title.</p>
Key LEA reporting requirements	<ul style="list-style-type: none"> • Ongoing homeless student data uploaded and entered into the McKinney-Vento QuickBase application; which resets annually • Annual census data regarding homeless students in partnership with The Community Partnership for the Prevention of Homelessness (TCP) • Annual needs assessment data as part of subgrantees' original and

	continuation application processes
Web-Based Resources on Grant Program	<p>The following resources will support LEA’s program implementation:</p> <p>OSSE program information and resources, including the District of Columbia Liaison Contact List and the Dispute Resolution Guidelines and Form: http://osse.dc.gov/service/education-homeless-children-and-youth-program</p> <p>The Community Partnership for the Prevention of Homelessness (TCP): http://www.community-partnership.org/</p> <p>National Center for Homeless Education (NCHE): http://center.serve.org/nche/</p> <p>National Association for the Education of Homeless Children and Youth (NAECHY): http://www.naehcy.org/</p>
OSSE Contact	<p>Mrs. Nicole Lee-Mwandha Homeless Education State Coordinator Community Learning and School Support Cluster Division of Elementary, Secondary and Specialized Education 202-654-6123 or Nicole.Lee-Mwandha@dc.gov</p> <p>Ms. Danielle C. Rollins Homeless Education Program Analyst Community Learning and School Support Cluster Division of Elementary, Secondary and Specialized Education 202-741-0255 or Danielle.Rollins@dc.gov</p> <p>Mr. Tasheen Stallings Homeless Education Program Analyst Community Learning and School Support Cluster Division of Elementary, Secondary and Specialized Education 202-478-5927 or Tasheen.Stallings@dc.gov</p>

Individuals with Disabilities Education Act, Part B

Grant Name	Individual With Disabilities Education Act, Part B
Legal Citation	20 U.S.C. §1400 et seq.
Grant Type	Formula
Grant Purpose	<p>The purposes of this grant are:</p> <ul style="list-style-type: none"> (a) To ensure that all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living; (b) To ensure that the rights of children with disabilities and their parents are protected; (c) To assist States, localities, educational service agencies, and Federal agencies to provide for the education of all children with disabilities; and (d) To assess and ensure the effectiveness of efforts to educate children with disabilities.
OSSE Monitoring Requirement	<p>20 U.S.C. 1416(a) requires that States monitor the implementation of the IDEA.</p> <p>DC ST 38-2561.01 (7)(a)(13)</p> <p>Under local special education law, OSSE “has primary responsibility for the state-level supervisory functions for special education that are typically handled by a state department of education or public instruction, a state board of education, a state education commission, or a state education authority.”</p>
Key LEA reporting requirements	<p>OSSE’s Monitoring and Compliance System is used to ensure that LEAs are meeting the requirements of both federal and local regulations. Pursuant to Title 5, Section 5019 of the District of Columbia Municipal Regulations, all LEAs (including independent charter LEAs) are required to input data into Special Education Data System (SEDS). OSSE reviews the data according to schedule on a quarterly and annual basis for reporting purposes.</p> <p>Annual Maintenance of Effort (MOE) collection, Annual Coordinated Early Intervening Services (CEIS) collection, Annual Excess Cost collection.</p>
Web-Based Resources on Grant Program	<p>Guidance on LEA Maintenance of Effort (MOE) and Coordinated Early Intervening Services (CEIS): http://cifr.wested.org/resources/</p> <p>U.S. Department of Education website that provides guidance on IDEA monitoring, technical assistance, and enforcement:</p>

	http://idea.ed.gov/explore/view/p/,root,dynamic,TopicalBrief,24
OSSE Contact	Dr. Cheryll James LEA Supervisory Monitoring Specialist Accountability, Performance and Support Cluster Division of Elementary, Secondary, and Specialized Education 202-724-7803 or Cheryll.James@dc.gov

Scholarships for Opportunity and Results (SOAR) Act

Grant Name	Scholarships for Opportunity and Results (SOAR) Act
Legal Citation	The Scholarships for Opportunity and Results (SOAR) Act, Pub. L. 112-10, 125 Stat. 199, §3004(b)(2)
Grant Type	Competitive
Grant Purpose	The purpose of the Scholarships for Opportunity and Results (SOAR) Act grant is to improve school performance and educational outcomes and to provide facility funding in order to increase the number of high-quality public charter school seats in the District of Columbia.
OSSE Monitoring Requirement	<p>2 CFR §200.331(d)(1-3):</p> <p>All pass-through entities must:</p> <p>(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:</p> <p>(1) Reviewing financial and performance reports required by the pass-through entity.</p> <p>(2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.</p> <p>(3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by § 200.521 Management decision.</p>
Key LEA reporting requirements	Semi-annual reporting and final report
Web-Based Resources on Grant Program	OSSE's SOAR Act information portal, where all information regarding SOAR Act and OSSE grant awarding information (including timelines, RFA, application information, etc.) can be found: http://osse.dc.gov/service/scholarships-opportunity-and-results-soar-act-grant

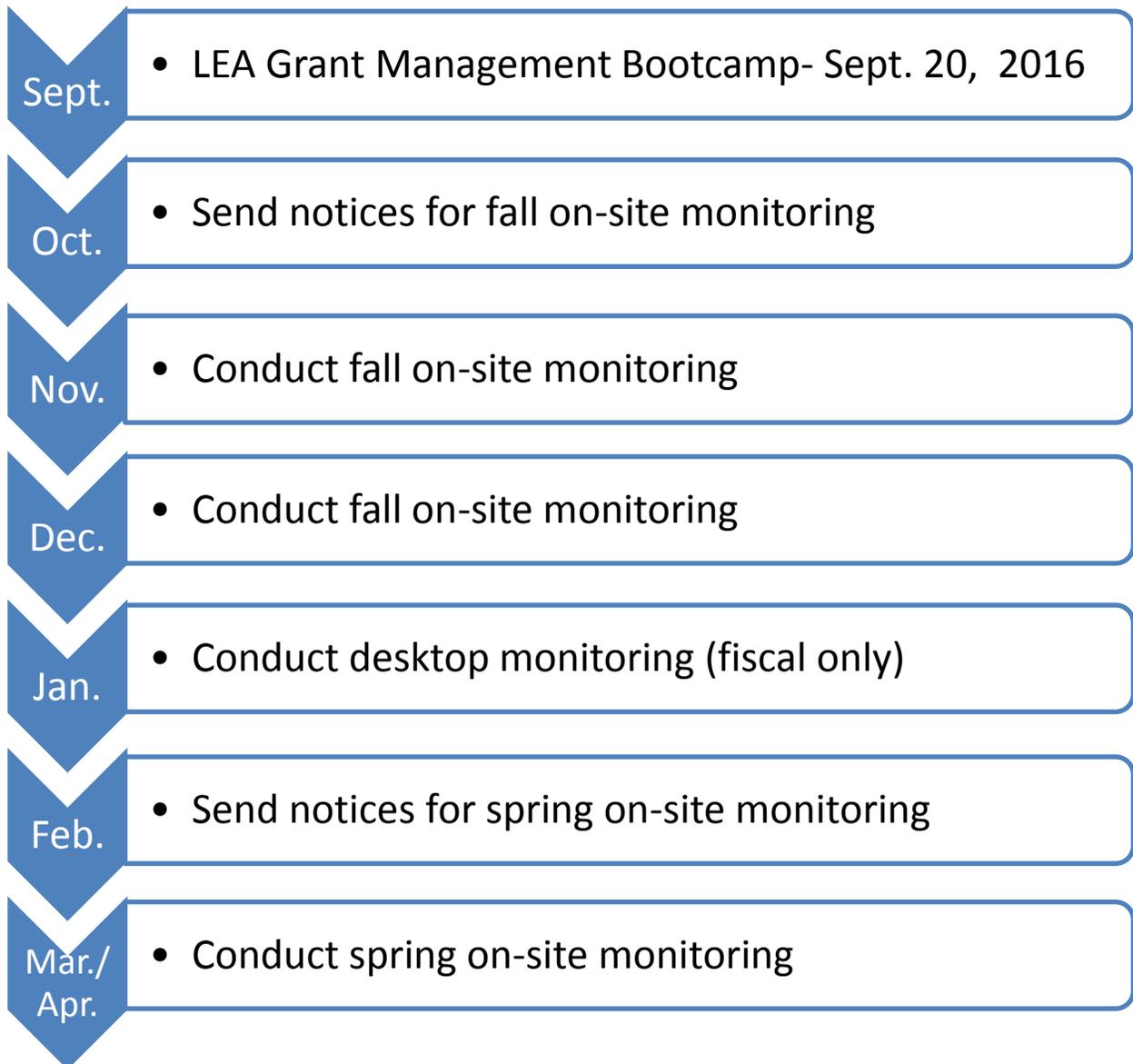
OSSE Contact	Ms. Katherine Cox Director, Office of Public Charter School Finance and Support Policy, Planning and Charter Support Cluster Division of Elementary, Secondary and Specialized Education 202-442-3265 or Katherine.Cox@dc.gov

Appendix

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Division of Elementary, Secondary, and Specialized Education Annual Monitoring Cycle, 2016-17





ESSE On-Site Monitoring Visit

Pre-Site Documentation Checklist – Due to OSSE by [Enter Date]

Sample document: To be used for illustrative purposes only

In an attempt to reduce administrative burden, increase transparency, and effectively use time and resources, OSSE’s Division of Elementary, Secondary and Specialized Education developed an outline of the documents the team will be reviewing prior to its on-site monitoring visit. OSSE’s intent is to: 1) access information already provided to OSSE by the LEA in every instance possible; and 2) complete as many monitoring activities as possible prior to coming on site.

To this end, ESSE has created a pre-site documentation checklist. You’ll see that the checklist denotes whether documents requested are (a) on file at OSSE, or (b) to be provided by the LEA.

On file at OSSE: Documents marked as on file at OSSE are required for the LEA’s on-site visit, but the LEA does not need to submit a copy, as OSSE has already received the document through other activities.

LEA must provide: Documents an LEA must submit for a visit will be marked with “yes” in the “LEA Must Provide” column below. Such documents should be submitted via email to osse.monitoring@dc.gov.

Please contact us at osse.monitoring@dc.gov to let us know of any documents that you do not possess.

In addition to the documents requested below, OSSE may ask for additional documentation from the previous and current grant year activities during the monitoring review process.

Fiscal Policies and Procedural Documents	On File at OSSE	LEA Must Provide
Fiscal Policy and Procedures (SY 2015- 2016)		
Budget and accounting policy		
Time & effort policy		
Procurement policy		
Compensation and payroll policy		
Internal controls policy		
Accounting policy		

Equipment record retention policy		
Conflict of interest policy		
Fiscal Management Records (SY 2015- 2016)		
List of staff paid with federal funds		
List of authorized signers and dollar threshold		
Chart of accounts/general Ledger		
Fiscal Audits/ Reports		
Most recent Single Audit (A-133) Report (applicable to subgrantees that receive \$750,000 or above in federal funds)		
Most recent Annual Financial Statement Audit		
Corrective Action Plan and any related documents (if applicable)		
Procurement (SY 2015- 2016)		
List of contracts awarded		
Excluded parties list for contracts awarded		
Communication with PCSB regarding contracts of \$25k or more		
Equipment and Technology (SY 2015- 2016)		
Equipment inventory log for equipment purchased with federal funds		
Equipment inventory log		

Programmatic Documents	Applicable Grant Program(s)	On File at OSSE	LEA Must Provide
Personnel Documents			
List of staff, including job descriptions Include teacher effectiveness, High Quality Teacher status, Highly Effective Teacher status, and class size reduction status (as applicable)	All		
List of teachers Highly Qualified by High Objective Uniform State Standard of Evaluation (HOUSSE)	Title I and II		
Staff/teacher assignments	Title I, II, and III		
Staff/teacher credentials (licensure, etc.)	Title I, II, and III		
Sample teacher/principal evaluation	Title II		
Organizational chart	All		
Master schedule of classes	Title I and II		
Professional Development/Staff Training			
Staff training/professional development (PD) policies	Title II		

Staff training/PD calendar, agenda, sign-in sheets, and planning documents	All		
Materials used in staff training and PD sessions	Title I, II, and McKinney-Vento		
List of professional development team members	Title I, II, and III		
Student-Level Documents			
List of students receiving relevant services (as applicable)	McKinney-Vento		
Academic performance/progress data	Title III and McKinney-Vento		
Student assessment policy	Title III and McKinney-Vento		
Documentation of program student enrollment procedures	Title III, Title V, Part B, and McKinney-Vento		
Student attendance records for identified students	IDEA Part B		
Discipline records and incident reports for identified students	IDEA Part B		
Student schedules for identified students	IDEA Part B		
Parent/Community Outreach			
Parental involvement/outreach policy and planning documents (current and past year)	Title I, Title III, and Title V, Part B		
Parent meeting/activity calendar, agendas and sign-in/attendance sheets	All		
Evidence of parent/community outreach	All		
Parent communications including requests for input	Title I, Title III, and McKinney-Vento		
Written parent notifications sample	Title I, Title III, and McKinney-Vento		
Samples of LEA/school notifications to parents regarding: LEA/School Improvement Status	Title I		
Samples of LEA/school notifications to parents regarding: Teacher/paraprofessional qualifications	Title I and II		

Samples of LEA/school notifications to parents regarding: Assignment with non-HQT teacher	Title I and II		
General Program Documents			
Grant application/GAN	All		
Program planning documents including -Strategic initiatives -Planned activities -Program goals	Title I and III		
Program needs assessment	Title II and McKinney-Vento		
A description of program services	Title I, Title III, and McKinney-Vento		
Data collection policies and procedures	Title III and Title V, Part B		
Enrollment Policies	Title III and Title V, Part B		
School Improvement Plans (IndiStar/similar program)	Title I and II		
Schoolwide Program Plans	Title I and II		
List of Schools Operating Schoolwide Programs	Title I		
LEA Complaint Policy	Title I		

Pre-Site Monitoring Visit Agenda [Sample]
[LEA]
[Date]

- [0:00 – 0:00] Welcome/Introductions (10 minutes)
- [0:00 – 0:00] Purpose of Visit (10 minutes)
- [0:00 – 0:00] Review of LEA Data (30 minutes)
- Risk Criteria that Resulted in Identification
 - Additional Data from Desktop Review
- [0:00 – 0:00] Review of On-site Monitoring Process (10 minutes)
- Review the Pre-Site Document Checklist
 - Confer about the agenda for the on-site visit
 - Interviews
 - Format: focus groups and individual interviews
 - Subjects: administrators, teachers, related service providers, parents, students and others as appropriate
 - Space: room assignments
 - Classroom Observations
 - Introduction and Exit Conference
 - Required attendees
- [0:00 – 0:00] Document Exchange (15 minutes)
- Any documents available based on the Pre-Site Document Checklist
- [0:00 – 0:00] Questions/Next Steps (15 minutes)

Note: Documents may be submitted either during the Pre-Site Monitoring Visit or aligned with the specific timelines outlined in the LEA’s monitoring notice.

Notice of Interview Letter

Dear Parent or Guardian:

The District of Columbia Office of the State Superintendent of Education (OSSE) is scheduled to visit your child's school on [DATE]. The purpose of this visit is to monitor [LEA's] compliance with special education laws.

We would like to speak with you and your child as part of this process. During interviews, we ask questions about the school's special education program. OSSE speaks to students at school on the day of the visit. For your convenience, OSSE will contact you by phone. Any information that you and your child give is confidential and neither you nor your child will be identified in any report. The interview is voluntary and persons interviewed may withdraw at any time.

If you do not wish for your child to be interviewed, please fill out the attached form and return it to your child's school as soon as possible or contact me at sharon.gaskins@dc.gov or 202-654-6112. Please remember to sign the form. If you do not return the attached form OSSE will assume that you have no objection to the interview.

Thank you for assisting us in ensuring compliance with the laws that protect the educational rights of children with disabilities.

Sincerely,

Sharon Gaskins
Deputy Assistant Superintendent of Accountability, Performance and Support
Division of Elementary, Secondary, and Specialized Education
Office of the State Superintendent of Education

OSSE Sub-Recipient Monitoring Policy



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

Sub-recipient Monitoring Policy

The Public Education Reform Amendment Act (PERAA) of 2007 (D.C. Law 17-9) established OSSE as the state education agency (SEA) for the District of Columbia (D.C. Code § 38-2601.01). As the SEA, OSSE is responsible for monitoring sub-recipients to ensure compliance with local and federal laws and regulations.

This document establishes the minimum requirements and standards that the Office of the State Superintendent of Education (OSSE) shall use to monitor federal and local programs implemented by grant sub-recipients, including, but not limited to: local education agencies (LEAs), institutions of higher education, community-based organizations, child care development centers, and other not-for-profit organizations. This policy and the procedures contained herein are subject to changes in applicable federal or local law, regulations, or guidance.

Each division or office within OSSE shall use this policy in developing individual program specific monitoring protocols and tools that address the requirements of each local and federal grant administered by the agency. Additionally, it is noted that programs should consult the City-Wide Grants Manual and Sourcebook when creating program specific monitoring tools for local funds. A copy of the Sourcebook and attachments can be found at: <http://opgs.dc.gov/book/citywide-grants-manual-and-sourcebook>.

This policy addresses types of monitoring and monitoring schedules. It also describes the structure of reports for monitoring, corrective action plans, conditions and restrictions, and resolution expectations.

Hanseul Kang
State Superintendent

Monitoring Policy

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I. DEFINITIONS AND PURPOSE OF MONITORING

Monitoring is the regular and systematic examination of all aspects associated with the administration and implementation of a state approved program in an effort to ensure that a sub-award is used for authorized purposes and in compliance with federal and local laws and regulations, and that the terms and conditions of the sub-award are achieved. The examination addresses programmatic and fiscal components. The process both ensures compliance with grant requirements and measures programmatic results, assisting the SEA in determining which programs need technical assistance in an effort to ensure high quality programs.

II. MONITORING CRITERIA

OSSE will consider at minimum the following risk-assessment criteria when determining the monitoring activities, rotation, and focus areas for each sub-recipient monitoring effort. *Please note that other program and/or fiscal specific criteria may also be considered at the discretion of the respective grant manager.*

- Results from required audits, including the single audit required by 2 CFR 200, Part F;
- Consistent noncompliance relative to unresolved findings identified during previous monitoring reviews;
- The outcome of individual complaints to the agency;
- Higher grant award totals;
- Excess carryover or failure to liquidate funds;
- Late reporting (*e.g.* expenditures, status reports, progress reports, equipment inventory, data collections);
- Lack of alignment between expenditures and approved budget;
- Ratio of disallowed to allowed costs;
- Lack of prior experience with the same or similar sub-awards;
- Failure to adhere to terms and conditions set forth in a Grant Award Notice (GAN) or other documents setting forth the program and fiscal requirements; and
- Failure to make substantial progress toward grant goals and objectives.

Additional risk assessment criteria may include, but are not limited to:

- Prior experience with the same or similar federally or locally-funded sub-awards;
- Administrative costs above budgeted amounts;
- Staffing capacity levels for completion of grant objectives; and
- Whether the sub-recipient has new personnel or new or substantially changed systems.

III. TYPES OF MONITORING ACTIVITIES

OSSE will conduct monitoring activities through both desktop and onsite monitoring. Scheduled onsite monitoring visits will be prioritized by risk-assessment criteria in accordance with 2 CFR § 200.331(b) (described above). Certain grant programs may choose to use a multi-step monitoring process which will include desktop and onsite monitoring in addition to other forms of monitoring. All monitoring strategies and schedules will be coordinated agency-wide to: identify cross-cutting areas of monitoring across programs, align efforts, set clear expectations, and avoid unnecessary burden on sub-recipients.

- A. **Desktop Monitoring:** During desktop monitoring, OSSE performs an intensive review of documents submitted by the sub-recipient or evidence that is otherwise available, in addition to utilizing data submitted by a sub-recipient that is already housed within OSSE’s data systems. Desktop monitoring may also include a more comprehensive review of a sub-recipient’s fiscal and programmatic activities and records. Desktop monitoring is a tiered monitoring approach that can be as specific as a request for documentation supporting a single reimbursement request or as expansive as a request for a series of quarterly reports or an external audit. Determinations from a desktop monitoring may prompt OSSE to schedule an onsite monitoring.
- B. **Onsite Monitoring:** Onsite monitoring involves a comprehensive assessment conducted by a monitoring team at a site where a program is operating. One or more content area experts from OSSE conduct this assessment on site to evaluate all phases of program and fiscal administration and operations using a monitoring tool aligned with grant requirements. Any sub-recipient selected for annual onsite monitoring activities will be notified at least four weeks in advance and will be informed of any documentation to prepare and/or submit prior to the OSSE monitoring team’s visit (commonly referred to as “pre-visit documentation”). OSSE may also conduct onsite monitoring concerning a specific focus area or set of circumstances related to a particular grant. While OSSE has the authority to conduct unannounced visits—and does so—on a case by case basis in consideration of the circumstances, OSSE aims to be as transparent as possible so as to minimize disruption to the academic program when conducting its reviews.
- C. During the onsite review, the monitoring team may perform the following tasks:
 - Review selected documentation (*e.g.* expense reports, local applications, programs of study, curriculum plans) relevant to the grant or program;
 - Review student data/student records as they relate to the grant or program;
 - Visit classrooms or service areas supported by the grant or program;
 - Use expenditure samples to verify and locate equipment purchased;
 - Visit location where financial records are kept;
 - Request sub-recipient to display their financial management system and provide a walkthrough of how transactions are recorded, reconciled, and tracked;
 - Conduct focus group meetings with faculty, staff, students, parents, providers, or other key stakeholders participating in or affected by the grant or program; and/or

- Conduct additional monitoring activities, as needed.

In the instance that student interviews are included within the scope of the planned activities, OSSE will work with the sub-recipient to identify potential students and will provide the sub-recipient with letters to assist the sub-recipient with requesting parental consent as appropriate prior to the interviews. OSSE will not conduct interviews without the receipt of appropriate consent.

At the conclusion of each onsite monitoring visit, the OSSE monitoring team will perform an exit interview with key sub-recipient staff to provide general feedback, outline outstanding documentation requests and the timeline for their submission, and discuss other information critical to draft OSSE's onsite monitoring report to the sub-recipient.

IV. TYPES OF EVIDENCE REQUESTED

OSSE will review documents related to both financial and programmatic activities prepared by the sub-recipient. Commonly requested records for both desktop and onsite monitoring include:

- Documentation related to payroll transactions (*e.g.* a list of employees paid with grant funds; job or position descriptions; time and effort records demonstrating employees worked on grant activities; time and attendance records demonstrating when employee worked; evidence of payroll reconciliations; accounting records indicating how salaries were charged; and/or payment records indicating how salaries were paid);
- Documentation related to procurement (*e.g.* requisitions; cost estimates; requests for bids, proposals, etc.; copies of bids, proposals, etc. submitted; evaluation documents; purchase orders or contracts; invoices; proof that items purchased were received; inventory records; and/or review of the excluded parties list);
- Equipment and other asset inventory logs, including evidence that a physical inventory was conducted if appropriate;
- Other expenditure receipts for items purchased under the grant;
- Fiscal documentation showing the sub-recipient is meeting its obligations under EDGAR 34 CFR §§76.730 and 76.731, and/or the City-Wide Grants Manual and Sourcebook, including documents showing:
 - a) The amount of funds available under the grant;
 - b) How the sub-recipient has used the funds;
 - c) The total cost of projects initiated via the grant award;
 - d) The share of projects' total cost provided from other sources; and
 - e) Other records necessary to facilitate an effective audit.
- Copies of policies and procedures concerning grant administration, especially those related to internal controls;
- Data related to performance against grant goals and objectives; and

- Representative samples of student or staff files.

V. COORDINATING MONITORING ACROSS OSSE

OSSE strives to coordinate monitoring functions for grant programs in order to reduce burden. OSSE's Enterprise Grants Management System (EGMS) and other shared resources enable OSSE's various divisions to reduce the administrative burden of monitoring for sub-recipients, including: coordinating visits; streamlining documentation requests; allowing document requests, response documents, monitoring reports from OSSE, and Corrective Action Plans (CAPs) to be uploaded to an online, centralized platform; and prioritizing monitoring based on information contained within other divisions' monitoring reports.

VI. MONITORING REPORTS

Within ninety (90) calendar days after completion of any desktop review or onsite monitoring (assuming receipt of all supporting documents and materials requested of the sub-recipient), OSSE will send a report to the sub-recipient that will include an overview of any findings, recommendations, and/or plans for onsite monitoring, if applicable. Should a Corrective Action Plan (CAP) that delineates strategies and a timeline in which the sub-recipient will correct any findings be required by OSSE, a sub-recipient will have thirty (30) calendar days to submit the CAP.

Additionally, in specific instances involving immediate student safety or the potential denial of a Free and Appropriate Public Education (FAPE) under the Individuals with Disabilities Education Act, corrective actions may either be stipulated by OSSE and/or include shorter timelines for implementation of the CAP.

VII. CORRECTIVE ACTION PLAN (CAP)

OSSE will review a sub-recipient's CAP and provide feedback to the sub-recipient within thirty (30) calendar days of receipt of the CAP. OSSE will either approve the CAP or provide targeted technical assistance to support the sub-recipient in strengthening the CAP to meet requirements. The OSSE program office will work with the sub-recipient to ensure the plan is sufficient, manageable, and timely. OSSE program staff will ensure that the CAP includes a timeline that requires correction of any findings as soon as possible and in no case more than one year from the date the finding was made. As described in additional detail under Section IX, the OSSE program office may submit post-monitoring documentation requests to ensure the CAP has been sufficiently implemented, and may include verification of CAP implementation as part of subsequent monitoring.

VIII. CONDITIONS/RESTRICTIONS

If a sub-recipient is determined to be high risk or fails to sufficiently implement its CAP within a timely manner, OSSE may impose special conditions or restrictions on the sub-recipient's ability to receive grant funds in the future. Special conditions or restrictions may include:

- Additional reporting;
- Additional onsite monitoring;

- Mandatory technical assistance; and/or
- Withholding or suspension of grant funds, with advanced notice via written notification.

Additional program-specific conditions may also be imposed at the discretion of the respective grant manager if a grant manager believes that the sub-recipient has failed to achieve the performance goals of the grant. The sub-recipient will be notified in writing by the OSSE grant manager if there are any special conditions or restrictions attached to the grant award. The notice will include:

- Nature of the special conditions/restrictions;
- The reasons why the additional conditions/restrictions are being imposed;
- The nature of the action (including any corrective actions) which must be implemented before the conditions/restrictions may be lifted;
- The time allowed for completing the actions, as applicable; and
- The method for requesting reconsideration of the additional requirements imposed.

OSSE will remove special conditions once the conditions that prompted them have been corrected.

IX. RESOLUTION OF NONCOMPLIANCE

OSSE will consider all findings from a monitoring visit resolved only after the sub-recipient has provided sufficient evidence that all findings of noncompliance have been corrected. Sufficient evidence may include, but is not limited to, additional testing of applicable records and the submission of documents identified by OSSE. Once OSSE has collected, reviewed, and deemed acceptable all evidence of implementation of corrective actions, OSSE will issue a closeout letter to the sub-recipient to indicate the findings have been resolved and to document any conditions/restrictions that have been lifted.

X. DESKTOP AND ON-SITE MONITORING SUMMARY TIMETABLE

This section delineates standard timelines related to key monitoring activities. Adjustments to the timeline based on extenuating circumstances will be determined on a case by case basis.

OSSE Monitoring Activity	Due date
Notification of annual onsite monitoring from OSSE to sub-recipient	4 weeks prior to start of onsite monitoring
Monitoring report from OSSE to sub-recipient (both desktop and onsite monitoring)	Ninety (90) days after completion of the review <u>and</u> receipt by OSSE of all supporting documents and materials requested of the sub-recipient
Corrective action plan (CAP) from sub-recipient to OSSE (if required by onsite monitoring report)	Thirty (30) days after receipt of the onsite monitoring report from OSSE
Feedback from OSSE to sub-recipient regarding CAP (if CAP is required)	Thirty (30) days after receipt of the CAP by OSSE
Documentation requests for verification of CAP implementation (post-monitoring)	On an as-needed basis

XI. MANAGEMENT DECISION LETTERS

Following review of the sub-recipient's single audit, as required by 2 CFR Part 200, Subpart F (or OMB A-133 for fiscal years beginning before December 26, 2014), OSSE will issue a management decision letter (MDL). The letter will state whether or not OSSE sustains the audit finding, provide the reasons for the decision, and identify the expected sub-recipient action to repay disallowed costs, make financial adjustments, or take any other corrective action. If the sub-recipient has not already completed the corrective action, the MDL will include a timetable for follow-up.

Prior to issuing the MDL, OSSE may request additional information or documentation from the sub-recipient as a way of mitigating disallowed costs. The MDL will also include a description of any appeal process available to the sub-recipient. OSSE will issue the MDL within six (6) months of acceptance of the audit report by the Federal Audit Clearinghouse. The MDL will include the reference numbers the auditor assigned to each audit finding.

XII. DEFINITIONS

- A. Federal Audit Clearinghouse (FAC)** means the clearinghouse designated by Office of Management and Budget (OMB) as the repository of record where non-Federal entities are required to transmit the reporting packages required by Subpart F—Audit Requirements of 2 CFR Part 200. The mailing address of the FAC is Federal Audit Clearinghouse, Bureau of the Census, 1201 E. 10th Street, Jeffersonville, IN 47132 and the web address is: <http://harvester.census.gov/sac/>. Any future updates to the location of the FAC may be found at the OMB Web site.
- B. Local Education Agency (LEA)** means an educational institution at the local level that exists primarily to operate a publicly funded school or schools providing elementary or secondary education in the District of Columbia, including the District of Columbia Public Schools (DCPS) and a District of Columbia public charter school. For the purposes of special education compliance monitoring, LEAs are responsible for ensuring that appropriate and compliant services are provided for students who have been parentally-placed in private (*i.e.*, non-public) institutions.
- C. Community-based Organization (CBO)** means an institution at the local level that exists primarily to engage in community development activities in a particular geographic area, which may include educational, economic, and housing development activities, with the goal of: improving the climate of the area, increasing educational or professional opportunities for the area's residents, or other desired outcomes.
- D. Sub-recipient** means a non-Federal entity that receives a sub-award from a pass-through entity to carry out part of a Federal program, but does not include an individual that is a beneficiary of such program. A sub-recipient may also be a recipient of other Federal awards directly from a Federal awarding agency.