



NATIONAL
CHARTER SCHOOL
RESOURCE CENTER

Overview of CSP SE/SEA Monitoring Comprehensive Annual Report 2019–20

*A Resource for CSP State Entity
Grantees*

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The National Charter School Resource Center (NCSRC) provides technical assistance to federal grantees and resources supporting charter sector stakeholders working across the charter school life cycle. NCSRC is funded by the U.S. Department of Education and managed by Manhattan Strategy Group in partnership with WestEd.

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Overview of Monitoring Findings

This document summarizes high-level monitoring findings for the U.S. Department of Education Charter School Programs (CSP) State Entity (SE)/State Educational Agency (SEA) grant program. The data shared below is based on a May 2021 annual report authored by WestEd detailing comprehensive SE/SEA monitoring findings. The data in the WestEd-authored annual report and therefore this overview are based on the SE/SEA grants that were monitored covering the time period of 2016–17 to 2019–20.

Indicators Fully Met by Most Grantees

Indicator #	Title	Ratio	Percentage
Indicator 1.2	Eligible Applicants	15 of 26 grantees	58%
Indicator 1.4	Flexibility and Autonomy	23 of 26 grantees	88%
Indicator 1.6	Program Periods	16 of 26 grantees	62%
Indicator 2.3	Supporting Educationally Disadvantaged Students	18 of 26 grantees	69%
Indicator 3.2	Charter Schools Funding	17 of 26 grantees	65%
Indicator 3.3	Allocation of CSP Funds	21 of 26 grantees	80%
Indicator 3.6	Charter School Procedures for Records and Closure	15 of 26 grantees	57%
Indicator 3.7	Compliance with Grant Conditions	17 of 26 grantees	65%
Indicator 4.2	Oversight of ED <i>Facts</i> Data Collection for Management Organizations	14 of 19 grantees	73%

Indicators Evenly Split by Grantees

Indicator #	Title	Ratio	Percentage
Indicator 1.1	Subgrant Application Descriptions and Assurances	13 of 26 grantees	50%
Indicator 3.1	State Plan	13 of 26 grantees	50%

Indicators Not Fully Met by Most Grantees

Indicator #	Title	Ratio	Percentage
Indicator 1.3	Definition of a Charter School	18 of 26 grantees	69%
Indicator 1.5	Peer Review	22 of 26 grantees	85%
Indicator 2.1	Quality Authorizing Practices	18 of 26 grantees	70%
Indicator 2.2	Technical Assistance Provision	6 of 8 grantees	75%
Indicator 2.4	Subgrantee Monitoring	21 of 26 grantees	81%

Indicator 2.5	Dissemination of Information and Best Practices	19 of 26 grantees	73%
Indicator 2.6	Assessment of Performance Measure Data	14 of 26 grantees	53%
Indicator 3.4	Fiscal Control and Fund Accounting Procedures	23 of 26 grantees	88%
Indicator 3.5	Use of Grant Funds	15 of 26 grantees	58%
Indicator 4.1	Mitigating Risk of Charter School Relationships with Management Organizations	17 of 20 grantees	85%

Indicators Fully Met by Most Grantees

Eligible Applicants (Indicator 1.2): 15 of 26 grantees (58%) complied with the requirements of this indicator. The majority of grantees had systems and processes in place to ensure that subgrants were awarded to eligible applicants. A common issue of those grantees that did not comply with this indicator was the lack of a process or system to effectively ensure that eligible applicants had not previously received CSP funding for the same purposes.

Flexibility and Autonomy (Indicator 1.4): 23 of 26 grantees (88%) complied with the requirements of this indicator. The vast majority of grantees demonstrated that charter schools in the state were afforded sufficient flexibility and autonomy (especially as it related to daily operations and budgetary decisions) under existing State law.

Program Periods (Indicator 1.6): 16 of 26 grantees (62%) complied with the requirements of this indicator. The majority of grantees had manual or electronic grants management systems in place that clearly documented subgrant award periods. Common issues of those grantees that did not comply with this indicator were related to not clearly communicating the start and end of the award periods to subgrantees or allowing subgrantees to incur costs more than 90 days prior to the award period without ED approval.

Supporting Educationally Disadvantaged Students (Indicator 2.3): 18 of 26 grantees (69%) complied with the requirements of this indicator. Grantee compliance for this indicator is measured relative to specific actions that were proposed. Grantees found in compliance were implementing the specific supports that they proposed in their grant applications. Grantees that were not in compliance had failed to develop plans for implementing their proposed activities.

Charter Schools Funding (Indicator 3.2): 17 of 26 grantees (65%) complied with the requirements of this indicator. The majority of grantees demonstrated that they informed charter schools and the community at large about the Federal funding opportunities available to charter schools (e.g., CSP subgrants, Title I). Of those grantees that did not comply with the indicator, most failed to ensure that parents and the community were notified about the CSP grant opportunities as required in statute. Rather, this information typically was sent to charter school leaders, developers, and authorizers.

Allocation of CSP Funds (Indicator 3.3): 21 of 26 grantees (80%) complied with the requirements of this indicator, ensuring that grant funds were used in required allotments according to statute; however, grantees' performance varied based on whether they were NCLB or ESSA grantees. Specifically, all but one NCLB grantee monitored complied with this indicator, whereas only half of the ESSA grantees monitored complied. ESSA grantees struggled with being underspent on technical assistance efforts and/or subgrants or being overspent on costs related to administrative purposes. It is likely that part of the challenge may be related to a general trend of slowed pipelines of eligible applicants for ESSA grants.

Charter School Procedures for Records and Closure (Indicator 3.6): 15 of 26 grantees (57%) complied with the requirements of this indicator by demonstrating that they had policies and practices in place to effectively support charter schools that close as well as transfer student records (including individualized education programs, or IEPs). A common area of concern for grantees that did not comply with the indicator was failure to take an active role in disseminating information about requirements for the timely and appropriate transfer of student records between charter schools and local educational agencies (LEAs) in the state. This sentiment was regularly echoed by subgrantees that were interviewed as a part of monitoring.

Compliance With Grant Conditions (Indicator 3.7): 17 of 26 grantees (65%) complied with the requirements of this indicator, demonstrating that they had appropriately addressed related grant conditions, including timely reporting of Annual Performance Report data, retaining appropriate grant files, and cooperating with the monitoring visit. A common concern among grantees that did not comply with this indicator included incomplete grant files.

Oversight of ED*Facts* Data Collection for Management Organizations (Indicator 4.2): 14 of 19 grantees (73%) complied with the requirements of this indicator. Most grantees reported all data elements and tables as required. Of the grantees that did not comply with this indicator, there were common concerns regarding the grantee's ability to report on ED*Facts* data related to management organizations.

Indicators Evenly Split by Grantees

Subgrant Application Descriptions and Assurances (Indicator 1.1): 13 of 26 grantees (50%) complied with the requirements of this indicator. Half of grantees obtained all of the descriptions and assurances noted in CSP statute through the subgrant application. Common issues for grantees were omitting one or two required descriptions or assurances from the subgrant application, such as requests for waivers, a description of how the school would be sustained after the end of the subgrant period, or how parents and the community would be involved in the planning and design of the charter school.

State Plan (Indicator 3.1): 13 of 26 grantees (50%) complied with the requirements of this indicator. Half of grantees implemented the strategy articulated in their grant applications to support the growth of high-quality charter schools as well as to utilize their logic model and management plan to ensure strong grant administration. Common issues for grantees included not effectively communicating to their Program Officer the impact of unexpected delays in their charter school pipelines that impacted their abilities to carry out grant project activities.

Indicators Not Fully Met by Most Grantees

Definition of a Charter School (Indicator 1.3): 18 of 26 grantees (69%) did not comply with the requirements of this indicator. While most grantees ensured that eligible applicants met the Federal definition of a charter school at the time of application, they lacked effective guidance or processes to ensure that subgrantees continued to meet the Federal definition of a charter school throughout the period of Federal CSP funding. Common issues were related to school lottery policies that did not align with existing Federal guidance.

Peer Review (Indicator 1.5): 22 of 26 grantees (85%) did not comply with the requirements of this indicator. All grantees used some form of peer review to review and select subgrant applicants, but not all grantees used a high-quality review process. Common issues included insufficient training for peer reviewers and insufficient or inconsistent criteria for awarding subgrants.

Quality Authorizing Practices (Indicator 2.1): 18 of 26 grantees (70%) did not comply with the requirements of this indicator. Many grantees lacked regulatory oversight of charter school authorizers, though they continued to work across State program offices, with State legislatures, and with authorizers and other stakeholders to strengthen authorizing practices and charter school oversight within their jurisdiction. Common issues among grantees that did not comply with this indicator included not having quality authorizing frameworks or evaluation tools in place as proposed and not ensuring that charter contracts specified the rights and responsibilities of both parties.

Technical Assistance Provision (Indicator 2.2): 6 of 8 grantees (75%) did not comply with the requirements of this indicator. Many of the compliance issues identified related to either grantees that were slow to implement their proposed technical assistance plans or grantees that changed their proposed approaches without approval from ED. This indicator was newly implemented for ESSA grantees in the 2018–19 monitoring cycle. Prior to ESSA, grantees were not required to provide dedicated, targeted technical assistance to eligible applicants and authorizers through the grant. The challenges associated with this area may be due to the newness of the requirement as well as a lack of consistent guidance and direction from the CSP.

Subgrantee Monitoring (Indicator 2.4): 21 of 26 grantees (81%) did not comply with the requirements of this indicator. Grantees consistently struggled to provide appropriate, comprehensive, and systematic monitoring of subgrantee projects. This included taking sufficient steps to ensure that subgrantees continued to meet the Federal definition of a charter school (as noted above) and adhered to the CSP assurances throughout the duration of the grant. Grantees also failed to consistently demonstrate that they had established training programs for their own monitors and had clear and aligned monitoring materials and/or rubrics to review programmatic and fiscal aspects of subgrantees.

Dissemination of Information and Best Practices (Indicator 2.5): 19 of 26 grantees (73%) did not comply with the requirements of this indicator. Of particular concern were grantee efforts to identify and disseminate information from CSP subgrantees to other LEAs and schools in the state as required by statute. Grantees often lacked a systematic way to define and identify best or

promising practices. Further, dissemination efforts rarely connected to all LEAs in the state as required by statute for grantees under NCLB.

Assessment of Performance Measure Data (Indicator 2.6): 14 of 26 grantees (53%) did not comply with the requirements of this indicator. Common areas of concern among grantees were related to inconsistent wording or measurement of performance measures over time. Grantees that did not comply with this indicator experienced these issues in isolation or experienced these issues across multiple performance measures.

Fiscal Control and Fund Accounting Procedures (Indicator 3.4): 23 of 26 grantees (88%) did not comply with the requirements of this indicator. All grantees demonstrated that they had appropriate financial reporting and cash management processes in place. However, there were common issues related to allowable costs guidelines, internal controls, budget controls, and disposition of assets. The consistent lack of understanding with this content indicates that grantees need more technical assistance as it relates to Uniform Guidance and appropriate fiscal controls and fund accounting procedures.

Use of Grant Funds (Indicator 3.5): 15 of 26 grantees (58%) did not comply with the requirements of this indicator. Several NCLB grantees failed to provide subgrantees with clear guidance on allowable expenses under the CSP, particularly as related to the planning and design versus implementation program periods, which resulted in nonallowable fund use by subgrantees. Issues with use of funds for ESSA grantees typically related to approving budgets with subgrantees or reimbursing subgrantees for expenses not allowed under the grant.

Mitigating Risk of Charter School Relationships With Management Organizations (Indicator 4.1): 17 of 20 grantees (85%) did not comply with the requirements of this indicator. Common issues identified among grantees monitored were failing to ensure adequate internal controls were in place, specifically regarding management organizations, and not using a definition of a management organization that aligned with the Federal definition.