



NATIONAL
CHARTER SCHOOL
RESOURCE CENTER

High Impact Monitoring Findings for Developer/Non- SEA Grantees

*A Resource Guide for CSP Developer
Grantees*

U.S. Department of Education
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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) Developer/Non-SEA grant program. The data shared below is based on a May 2021 annual report authored by WestEd detailing comprehensive Developer/Non-SEA monitoring findings. The data in the WestEd-authored annual report and therefore this overview are based on the Developer/Non-SEA grants that were monitored covering the time period of 2018-2019 to 2019-2020.

Indicators Fully Met by Most Grantees

Indicator #	Title	Ratio	Percentage
Indicator 1.1	Definition of a Charter School	13 of 17 grantees	76%
Indicator 1.5	Parent and Community Involvement	11 of 17 grantees	65%
Indicator 2.2	Competitive Priorities	11 of 15 grantees	73%
Indicator 2.4	Assisting Educationally Disadvantaged Students	12 of 17 grantees	71%

Indicators Not Fully Met by Most Grantees

Indicator #	Title	Ratio	Percentage
Indicator 1.2	Program Implementation	10 of 17 grantees	59%
Indicator 1.3	Management Plan Implementation	11 of 17 grantees	65%
Indicator 1.4	Recruitment, Lottery, and Enrollment	12 of 17 grantees	71%
Indicator 2.1	Quality Controls	9 of 12 grantees	75%
Indicator 2.3	Quality Controls	11 of 17 grantees	65%
Indicator 2.5	Assessment of Performance Measures	9 of 12 grantees	75%
Indicator 3.1	Use of Grant Funds	12 of 17 grantees	71%
Indicator 3.2	Fiscal Control and Fund Accounting	0 of 17 grantees	0%
Indicator 3.3	Records Management	12 of 17 grantees	71%

Indicators Fully Met by Most Grantees

Definition of a Charter School (Indicator 1.1). Thirteen of 17 grantees (76%) were in compliance with the requirements of the indicator because they continued to meet the 13 required elements in the definition of a charter school during the grant period as presented in their original or approved CSP application.

Parent and Community Involvement (Indicator 1.5). Eleven of 17 grantees (65%) were in compliance with the expectations for the indicator. These grantees involved parents and other members of the community in the planning, design, and implementation of the school, which is the basis for meeting this indicator. Grantees involved local community-based organizations (CBOs), faith-based organizations, the local school district, and local city leaders in meetings to plan the school. Parents served on school governing Boards and advisory committees and influenced the adjustment of teacher schedules for parent conferences and the provision of transportation between campuses of a school.

Competitive Priorities (Indicator 2.2). Eleven of 15 grantees (73%) responded to one or more competitive priorities and were found to be in compliance with this indicator by demonstrating that they continued to implement the priorities as presented in their original or approved modified application throughout the grant period. These priorities included supporting high-need students by increasing access to high-quality education choice, dual or concurrent enrollment programs and early college high schools or being single school operators.

Assisting Educationally Disadvantaged Students (Indicator 2.4). Twelve of 17 grantees (71%) were in compliance with this indicator regarding assisting educationally disadvantaged students because they supported students as proposed in their original or approved grant application. Many grantees used instructional programs to individualize and differentiate instruction to meet varying student needs.

Indicators Not Fully Met by Most Grantees

Program Implementation (Indicator 1.2). Ten of 17 grantees (59%) did not comply with the indicator. These grantees did not implement the proposed and approved educational program that included not serving the targeted number of students, not implementing the approved curriculum, and not providing professional development as proposed.

Management Plan Implementation (Indicator 1.3). Eleven of 17 grantees (65%) were not in compliance with the requirements of the indicator. These grantees did not implement the proposed management plan, did not have appropriate Board oversight of the school, or did not adequately maintain documentation of approved changes to the Project Director.

Recruitment, Lottery, and Enrollment (Indicator 1.4). Twelve of 17 grantees (71%) were not in compliance with the indicator because they had recruitment, lottery, and/or enrollment strategies that exceeded Federal recommendations in applicable, non-regulatory guidance. These grantees did not have documentation of lottery policies or had lottery preferences beyond those allowed by Federal guidance.

Quality Controls (Indicator 2.1). Nine of 12 grantees (75%) did not comply with the indicator to submit student performance data that showed they were performing similar to what was provided in the approved grant applications or did not demonstrate consistent increases in performance. Grantees struggled to provide updated data to what was submitted in the grant application.

Quality Controls (Indicator 2.3). Eleven of 17 grantees (65%) were not in compliance with the requirements of the indicator because they lacked a written policy for school closure or a policy for student placement in other high-quality schools in the event of school closure or both. Additionally, grantees did not have authorizer agreements that included performance metrics for students and school operations and a charter renewal process.

Assessment of Performance Measures (Indicator 2.5). Nine of 12 grantees (75%) were not in compliance with this indicator and did not have the capacity to collect and use quality data to inform progress in meeting grant objectives. These grantees had inconsistent wording, inconsistent units of measure, or incomplete data for their performance measures. Five grantees could not be assessed on this indicator because they were working with ED to develop appropriate performance measures.

Use of Grant Funds (Indicator 3.1). Twelve of 17 grantees (71%) did not comply with the requirements of the indicator to use grant funds only for allowable purposes and as approved by ED. Some grantees did not understand which expenses were allowable. Some grantees used grant funds for purchases that were not originally budgeted and approved and/or did not receive approval from the Program Officer to expend funds on items other than what was proposed and approved.

Fiscal Control and Fund Accounting (Indicator 3.2). No grantees complied with the requirements of the indicator which calls for aligning accounting practices related to the CSP grant with Federal requirements for fund accounting. Reasons for not meeting the indicator included not being aware of fiscal policies, not having consistent policies and practices, not having proper internal controls such as a lack of tagged equipment purchased with grant funds, not having proper tracking of the CSP budget to compare expended amounts with those proposed and approved by ED, and not having a conflict-of-interest form.

Records Management (Indicator 3.3). Twelve of 17 grantees (71%) were not in compliance with the requirements of the indicator to maintain financial and programmatic records, supporting documents, statistical records, and other records related to the CSP grant funds for grant monitoring and audit purposes. Grantees did not maintain complete CSP records, including APRs, correspondence with the Program Officer, and financial records. Ten grantees did not have records retention policies that included the required time period.

Resources to Assist Grantees in Meeting Indicators

U.S. Department of Education Resources & Guidance

Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>

Disposition of Equipment and Supplies

<https://manhattansg.sharepoint.com/:b:/s/FED029-NCSRC/EWVpitfRA9JIusXq8ItOtoEBkvoq9s06UGlakTxzzgZchQ?e=C67S1u>

§200.334 Retention requirements for records

<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>

EDGAR

<https://www.ecfr.gov/current/title-34/part-75>

CSP Nonregulatory Guidance

<https://www2.ed.gov/programs/charter/fy14cspnonregguidance.doc> (see page 17 for lottery guidance)

Grants Training and Management Resources Online Grants Training Courses

<https://www2.ed.gov/fund/grant/about/training-management.html>

National Charter School Resource Center (NCSRC) Resources

NCSRC Logic Model Toolkit

<https://charterschoolcenter.ed.gov/publication/logic-model-toolkit-resource-current-and-prospective-grantees-charter-school-programs>

SMART Objectives Toolkit (& Accompanying Webinar)

<https://charterschoolcenter.ed.gov/publication/smart-objectives-toolkit> and <https://charterschoolcenter.ed.gov/webinar/smart-approach-strategies-making-objectives-smart>

What to Expect When Getting Monitored

<https://charterschoolcenter.ed.gov/webinar/what-expect-when-getting-monitored>

Ten Things We Learned from Monitoring

<https://charterschoolcenter.ed.gov/webinar/ten-things-we-learned-monitoring>

Administering Ed Grants (on fiscal accountability & internal controls)

<https://charterschoolcenter.ed.gov/webinar/administering-ed-grants>

Indirect Costs Decoded

<https://charterschoolcenter.ed.gov/webinar/indirect-costs-decoded>

Administering ED Grants

<https://charterschoolcenter.ed.gov/webinar/administering-ed-grants>

2021 PD Meeting Materials

<https://app.socio.events/ODU1OQ/auth>