



NATIONAL
CHARTER SCHOOL
RESOURCE CENTER

Non-SEA SE Grantee Symposium – Day 1

*A Two-Day Workshop on Grants Administration for Non-SEA
State Entity Grantees*

July 14-15, 2021 | Virtual

charterschoolcenter.ed.gov

Day One

About the NCSRC

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





Cameras Off/Cameras On Icebreaker

Day 1 Speakers



Jennifer Todd
Ashley Gardner



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Sharon Herpin, Ed.D.
Robin Chait
Kelly Wynveen

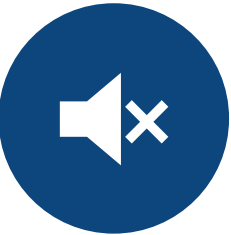


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And... YOU!



Norms



Remember to mute yourself



Utilize the chat for questions and comments



Actively participate in discussions



Respond to the survey



Observe the Vegas Rule



The main session is being recorded. By participating, you are consenting to be recorded. Breakout room discussions will not be recorded.

Agenda

Day One – July 14

- | | |
|----------------|---|
| 2-2:10 p.m. | Welcome/Overview |
| 2:10-3:10 p.m. | Grantee Introductions & Lessons Learned |
| 3:10-3:20 p.m. | Break |
| 3:20-4:20 p.m. | Internal Controls |
| 4:20-4:30 p.m. | Q&A/Closing Thoughts |

Day Two – July 15

- | | |
|----------------|-----------------------|
| 2-2:10 p.m. | Welcome/Overview |
| 2:10-3:10 p.m. | Subgrantee Monitoring |
| 3:10-3:20 p.m. | Break |
| 3:20-4:20 p.m. | Peer Review |
| 4:20-4:30 p.m. | Q&A/Closing Thoughts |

Meeting Objective and Purpose



Purpose: Bring together grantees for technical assistance and community building



Objective: Provide direct technical assistance to non-SEA SE grantees in areas of high need to ensure grantees are effective stewards of CSP funding

Grantee Introductions & Lessons Learned

Alabama

Arkansas

Idaho

Mississippi

New Jersey

Oklahoma

Opportunity 180

Pennsylvania

Washington



Tell us the main goals of your grant.



Tell us one lesson learned from managing your grant.



Tell us one success you've had managing your grant.



Tell us what you are hoping to get out of the workshop.



10 Minute Break



Key Elements of Internal Controls

What are internal controls?

Policies and processes by which an organization assures operational objectives are achieved efficiently, effectively, and with reliable, compliant reporting



An entity's oversight body, management, and other personnel who provide reasonable assurance that the objectives of an entity will be achieved



2 C.F.R. 20.303 - Internal Controls elevated as accountability measure

Internal Control Components

GAO-14-704G



Control Environment

Risk Assessment



Control Activities

Information & Communication



Monitoring

Why have internal controls?

To ensure compliance and fiscal responsibility

To enhance oversight of sub-recipients, such as risk assessments and monitoring tools

To focus on performance expectations and results



4 Key Elements of Internal Controls for CSSO/Non-SEA SE Grantees



Subgrantee Reimbursements



Tagging of Assets



Documenting and Communicating Policies and Procedures

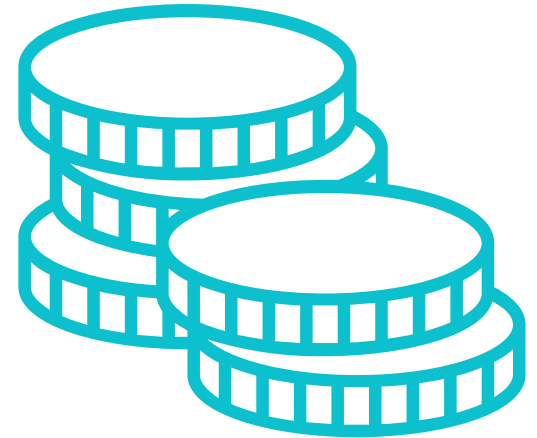


Segregation of Duties

Subgrantee Reimbursements

Things to Consider:

- Are expenses allowable, allocable, necessary, and reasonable?
- Are expenses in the approved budget?
- Is adequate documentation included with the reimbursement request?
- Were the expenses within the appropriate performance period (planning/implementation)?



Compliant or Non-Compliant?

Scenario #1

Questions for Discussion

- Is this scenario in compliance?
- Why or why not?

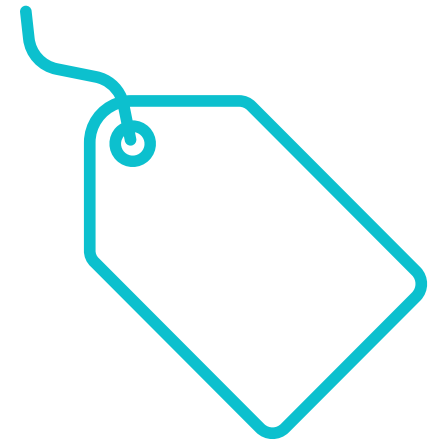
Facts:

- On July 1, SE awards \$1.5M to subgrantee
- On July 16, subgrantee submits reimbursement request and appropriate paperwork for \$200K covering prior 6 months of expenses
- On August 15, subgrantee submits reimbursement request to cover principal salaries through December

Tagging of Assets

It is the SE's responsibility to ensure subgrantees have proper inventory controls, including tagging assets.

- How is the subgrantee tracking inventory?
- Can items purchased with grant funds be easily identified?
- Are purchased items appropriately tagged?



What does it look like when a subgrantee is effectively tagging assets?

Compliant or Non-Compliant? Scenario #2

Questions for Discussion

- Is this scenario in compliance?
- Why or why not?

Facts:

- On July 1, SE awards \$1.5M to developer
- On July 16, developer purchases 200 Chromebooks
- On August 2, Chromebooks arrive and serial numbers are logged
- On August 15, Chromebooks are distributed to students

Documenting and Communicating Policies and Procedures



Ensure documentation is:

- Clear, concise, and detailed
- Consistent with institutional policy
- Meets federal and state requirements
- Meets CSP program requirements

Ensure appropriate documentation is disseminated throughout the grant cycle.

Why document your policies and procedures?

Do Your Subgrantees Have These Policies?



Conflict of Interest



School Closure



Disposition/Depreciation of Assets



Admissions Lottery Policy (Including Preferences and Weights)



Purchasing/Procurement Policy



Document Retention



Student Discipline (Suspension/Expulsion)

Segregation of Duties



Having a clear segregation of duties is a preventative activity within your internal controls to mitigate potential risks.

- Who initiates the transaction?
- Who approves the transaction?
- Who performs the transaction?
- Who reviews and reconciles the transaction?
- How is this documented?

But What About...



Our team is small, potentially just two people!



We're unsure about a reimbursement request. How do we tell if it's allowable?



There have been changes in processes or we anticipate changes since our grant was awarded; what do we do?

Scenario Review #1

Questions for Discussion

- What could be improved?

Scenario A:

- A CSSO is awarded a new CSP grant.
- The CSSO has two people working on the grant, the project director and authorizing official.
- The CSSO tailors an RFA from an SEA and runs its first competition round.
- After the competition, they begin developing policies and procedures as they are needed for operating the grant.

Scenario Review #2

Questions for Discussion

- What would you as the SE do in this situation?

Scenario B:

- A CMO receives a CSP SE subgrant for expansion in 2019 to go from K-5 to K-8 over three years.
- A new grade is added as planned in 2020.
- In 2021, the authorizer does not renew the school's charter and it must close at the end of the 2021-22 school year.



Additional Questions Related to Internal Controls

Closing Thoughts from CSP

Share one thing you learned from today's presentation in the chat.



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Non-SEA SE Grantee Symposium – Day 2

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Day Two



In the chat...

Share the best piece of advice you've received related to your CSP grant.

Day 2 Speakers



Jennifer Todd
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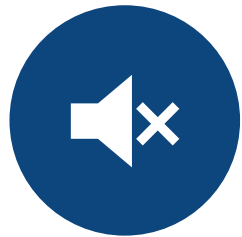


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Key Elements of an Effective Subgrantee Monitoring Plan

Purpose of Subgrantee Monitoring

1

Ensure compliance with federal laws and regulations governing the use of grant funds

2

Ensure compliance with subgrant application

3

Measure subgrantee progress toward meeting performance goals

Key Elements of Effective Subgrantee Monitoring



Monitoring Mechanics



Monitoring Content



Monitoring Follow Up

Monitoring Mechanics



Who

Who is doing the monitoring?



Which

Which subgrantees are getting monitored?



When

How frequently are grantees monitored?



How

What types of monitoring activities are being conducted?

Monitoring Mechanics – Who



- Who on the team will monitor?
 - Preferred qualifications:
 - Expertise in charter schools
 - Knowledge of grants management
 - Knowledge for monitoring:
 - CSP requirements
 - Allowable expenses
 - Subgrantee grant application
- Provide training to monitors

Monitoring Mechanics – Who (Will Be Trained?)



Training Content

Overview of CSP requirements

Content they are monitoring

Rubrics and checklists they will use

Acceptable evidence



Training Options

Host a virtual training session

Create modules for monitors to watch

Hold practice sessions

Monitoring Mechanics – Which

Which subgrantees are getting monitored on-site annually?



Two options:

- 1 - All subgrantees
- 2 - Use a risk-based approach

Monitoring Mechanics – When?



Full, on-site monitoring at least once during the grant period



Some type of monitoring at least annually to ensure subgrantees are on track with grant implementation



Monitor subgrantee expenditures more frequently--at least quarterly

Monitoring Mechanics – How?



Desktop monitoring

Expenditures, policies, progress toward grant objectives



Onsite monitoring

Student safety and operational management, meeting the needs of disadvantaged students, programmatic elements of application



Virtual monitoring

Authorizer interviews, interviews with developer staff

Monitoring Supports

A monitoring guide outlines key topics and indicators you will monitor

Important for communicating expectations to subgrantees

A rubric should define acceptable evidence and ratings

Peer examples are helpful

Sample Monitoring Rubric

Indicator P3: The subgrantee has adopted and implements conflict of interest policies that prevent real or apparent conflicts of interest.		
Criteria for the indicator:		
<ul style="list-style-type: none"> • The governing board has adopted and implemented a conflict of interest policy that prevents real or apparent conflicts of interest; • Board minutes document when a member has a real or apparent conflict of interest and the member has abstained from voting on any related business items; and • The school does not enter into lease/rental contracts where any board member has a real or apparent conflict of interest. 		
Subgrantee must upload documentation:		
<ul style="list-style-type: none"> • List of governing board members and their affiliations; • Conflict of interest policy and board minutes; • Rent/lease contract/agreements; and • Board minutes indicating when a governing board member abstains from voting due to a real or perceived conflict of interest (if applicable). 		
Subgrantee must answer these questions:		
<ol style="list-style-type: none"> 1. Describe the process your governing board follows when a conflict of interest is discovered. 2. (If applicable) Has a governing board member abstained from voting on any related business items that are a conflict of interest? 		
Rating: (Department determines.)	Compliant	Not Compliant

Subgrantee Monitoring Checklist

Verifications Needed During the Application Process	
√	The applicant applied to an authorized public chartering authority to operate a charter school.
√	The applicant provided adequate and timely notice to that authority regarding the CSP application.
√	The applicant has nonprofit status.
√	The applicant is an organization with articles of incorporation.
√	The applicant has not received a previous award under the grant, directly from ED or an SE, for the same purpose.
√	For Replication or Expansion applicants: that the charter school is high quality, and a) shows evidence of strong academic results, which may include strong student academic growth, as determined by a State b) has no significant issues in the areas of student safety, financial and operational management, or statutory or regulatory compliance c) has demonstrated success in significantly increasing student academic achievement
√	The proposed school is exempt from significant State or local rules that inhibit the flexible operation and management of public schools.
√	The proposed school is created by a developer as a public school, or adapted from an existing public school and is operated under public supervision and direction.

Pain Points in Subgrantee Monitoring: Discussion

How do you continue to ensure that subgrantees meet the federal definition of a charter school throughout the life of the grant?

How are you monitoring the implementation of a lottery policy?

Monitoring Activities – Sources

Subgrant application

Interviews with authorizers

Interviews with developer staff

Onsite reviews

Financial documents

Board minutes

Charter contract

School website

Monitoring Follow-Up



Written report on findings (positive and negative)

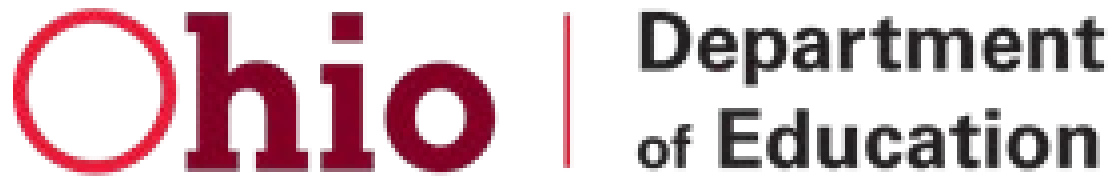


Share with subgrantee and authorizer



Plan for subgrantee to address deficiencies within a specified time period
(corrective action plan)

Subgrantee Monitoring Tips from Your Peers



Karl Koenig, Director, Office of Community Schools
Tiffany Cartier White, CSP Grant Administrator



JoAnna Laghetto, Finance and Data Coordinator



What is one thing you wish someone told you when you were just getting started with your grant?



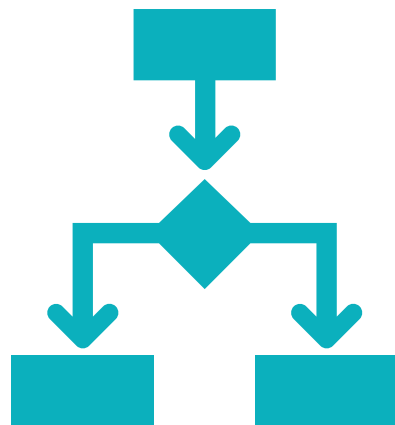
Pro Tip #1: Set Expectations

*Make sure your subgrantees are aware of **what** you are monitoring and **how** you are conducting your monitoring.*



Pro Tip #2: Provide Training

Offer trainings on your monitoring process and share with subgrantees examples of your own monitoring systems to model how they may organize their monitoring files.



Pro Tip #3: Use What is Available

Don't recreate the wheel. Look to the SEA and authorizers for existing structures to support your monitoring processes.



Pro Tip #4: Focus on Trust

Foster a relationship built on trust with subgrantees.



Additional Questions Related to Internal Controls

10 Minute Break



Key Elements of an Effective Peer Review Process

Part I: Key Elements of Effective Peer Review Process



Selection process for peer reviewers



Criteria for assessing applications



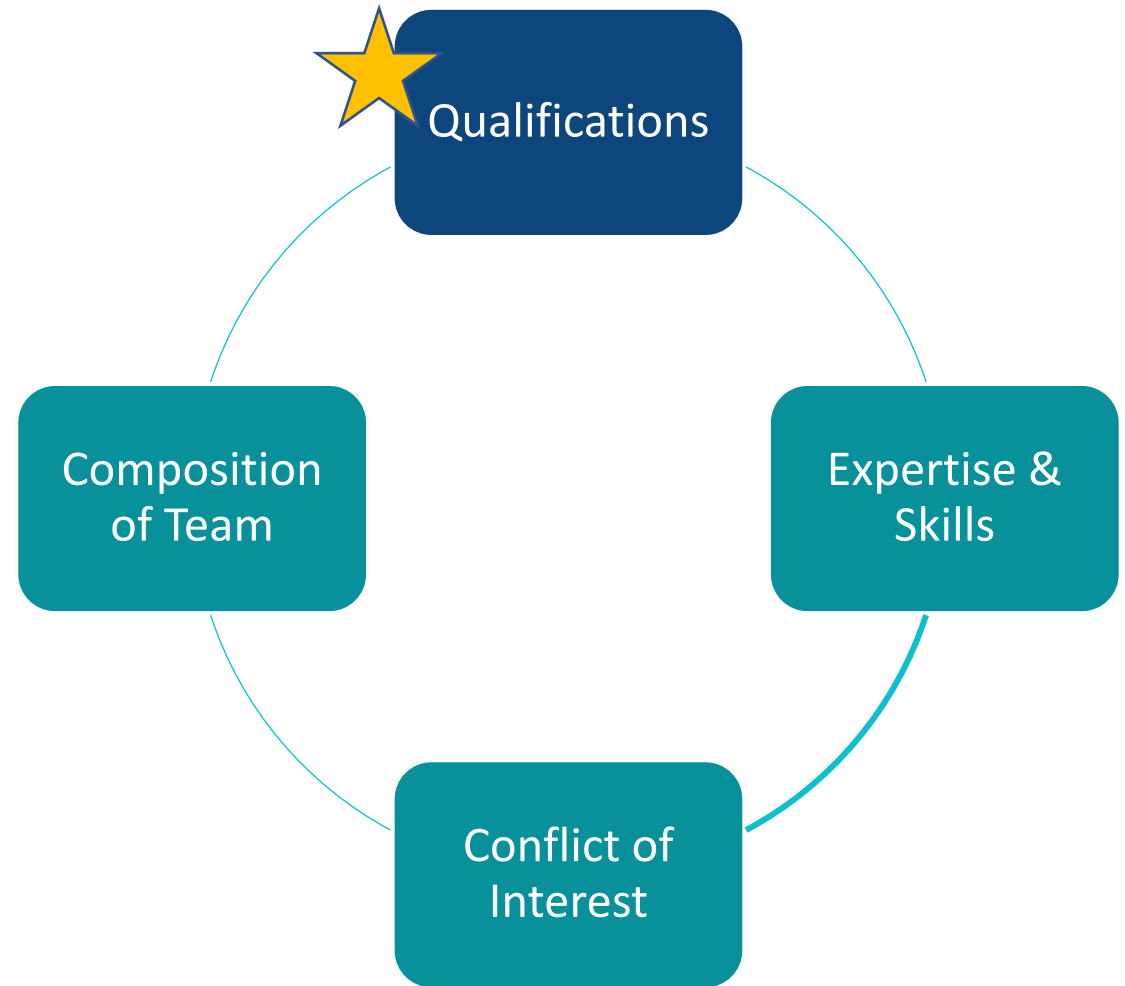
Process for guidance and training

Who is a Peer Reviewer? – Qualifications

Highly qualified Individuals such as colleagues or peers with an in-depth knowledge of the subject area.

What qualifications are needed to review applications?

- There are no firm rules for qualifications for Peer Reviewers – articulate your own requirements.
- SE staff not associated with the grant are allowed to participate but cannot have conflicts of interest.



Who is a Peer Reviewer? – Expertise

What expertise is needed to review applications?

- Background in education
- Charter knowledge
- Financial, operational, or governance expertise
- Expertise in SpEd, ELL, etc.
- Grants management expertise



Who is a Peer Reviewer? – COI

What qualifies as a conflict of interest?

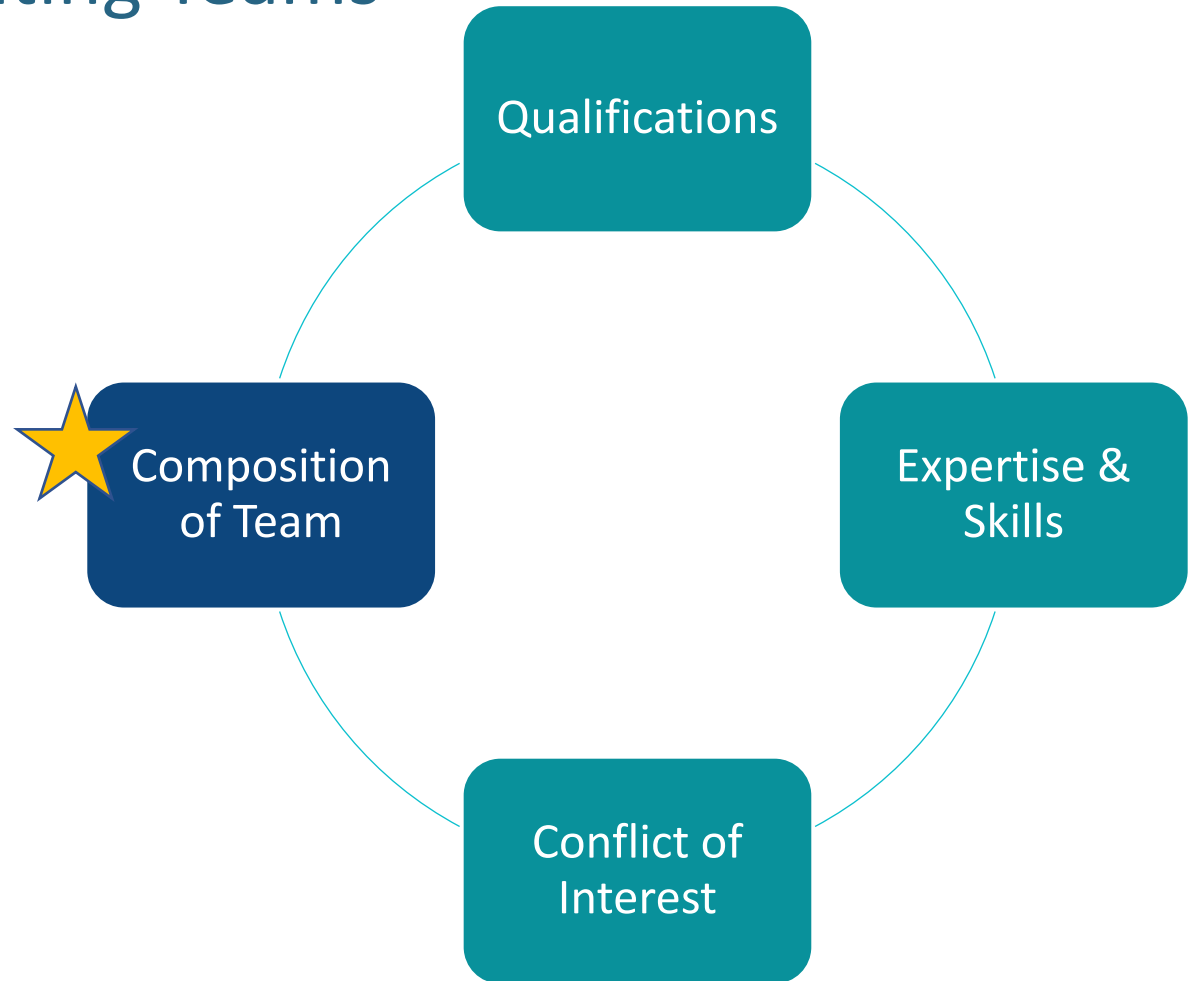
- Possible, apparent and/or actual conflicts of interest must be avoided
- Former or current employee of applicant, consultant, or advisor
- Any financial interest
- Personal relationships that would impair ability to impartially review an application
- May benefit reviewer in some way from an applicant receiving a grant



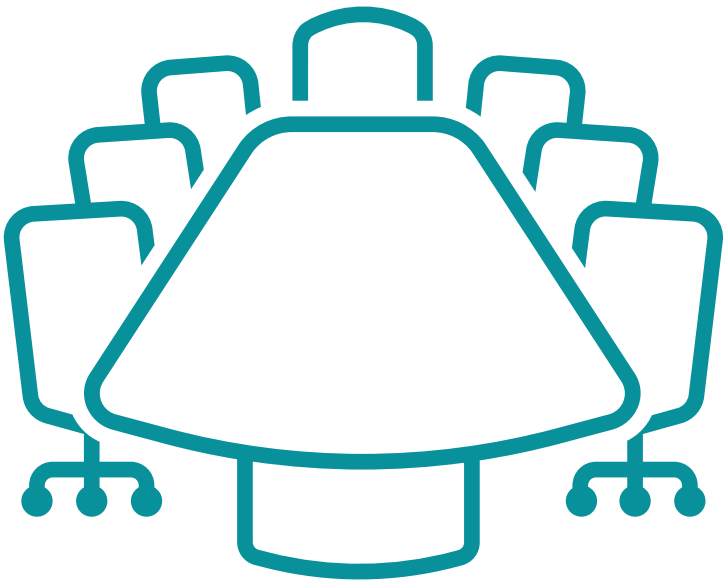
Who is a Peer Reviewer? – Creating Teams

When creating review teams, consider:

- How many reviewers are needed per application?
- What skills are needed across reviewers?
- What specific knowledge might be needed based on the application?
- Does your peer review plan adhere to what was proposed in the original application?



Questions to Consider in Identifying and Recruiting Peer Reviewers



- Do you have a documented plan for your peer review process?
- Are you compensating external reviewers?
- How do you keep a running list of potential reviewers throughout the year?
- How are you publicizing the opportunity to be a peer reviewer?
- What documents are you requiring peer reviewers to submit?

Criteria for Assessing Applications



Develop criteria for assessing applications and determining awards



Develop a rubric for reviewers to use in assessing applications



Ensure reviewers are grounding decisions in the rubric and criteria provided

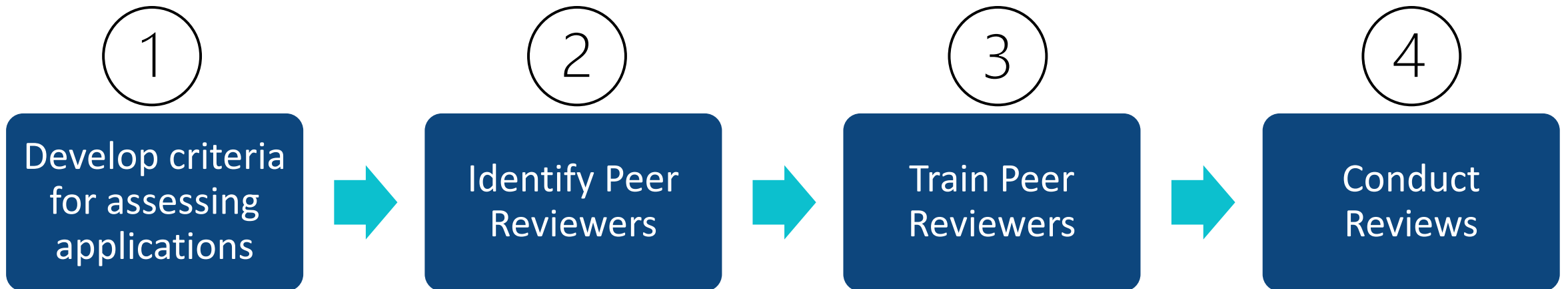
Example Rubric

SEA Grantee:
Colorado Department of
Education
[2020 RFA](#)

Section A: Executive Summary Briefly introduce the reader to your school, including a summary of your school’s vision & mission, organizational structure, educational program, community need, and expected outcomes. What does this school want to accomplish, and why is that important to the community you intend to serve? How your school will ensure all students are ready for college and/or living-wage jobs? Identify the grant project goals and begin to explain how they will support your planning and implementation of the school. Also, describe who is planning this school.					
Selection Criteria	Minimally Addresses or does not meet criteria <i>(information significantly incomplete or not provided)</i>	Meets some, but not all, identified criteria <i>(requires additional clarification)</i>	Addresses criteria but did not provide thorough detail <i>(adequate response, but not thoroughly developed response)</i>	Meets All Criteria with thorough detail <i>(clear, concise, and well thought out response)</i>	Total
1) Proposal clearly explains why this school should open at this time and in the geographic area and community in which it is planned for the school to serve, including the following: a. Identifies the needs of the community you plan to serve in terms of demographics, the range of educational options currently available, and range of performance outcomes typically seen.	0	2	3	4	

Process for Guidance and Training

- Training should include
 - In-depth review of rubric used for evaluation
 - Norming on review criteria
 - Practice!



Review Day: Things to Consider



Are reviewers asked to score applications individually before the review day?



Will your review be conducted in-person or virtually?



Are you utilizing cut scores or are applications ranked?



What are the cut scores for funding? How was this cut score determined?

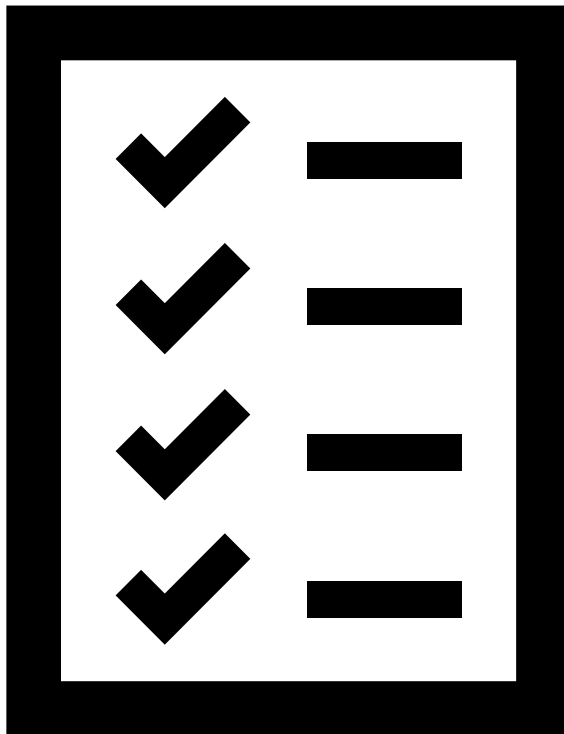


How will a reviewer who cannot or will not complete a review be handled?



Do you have a process for appeals?

Peer Review Plan Elements Checklist



- To help guide you with ensuring your plan for peer reviews has all elements documented, we have developed a checklist. Use this checklist to help ensure all aspects of your peer review plan are included.

Let's Discuss: Peer Review Plan Example – Scoring Process



What are the strengths of this plan?



What are the areas that need to be improved?

Part II: Common Challenges with Peer Reviewers



What do you do if you can't identify enough peer reviewers?



What are common issues that have come up during a review process? How did you deal with these issues?



What other processes or procedures might you have in place if scores appear to be inconsistent within or across teams?



Additional Questions Related to Peer Review

Upcoming Webinar



Common Monitoring Findings for SE Grantees

July 21 from 2-3:30 p.m. ET/11-1:30 p.m. PT

How did we do?



How can you contact NCSRC?



charterschoolcenter.ed.gov



contact-us@charterschoolcenter.org

Closing Thoughts from CSP

Share one thing you learned from today's presentation in the chat.



THANK YOU!

