



NATIONAL  
**CHARTER SCHOOL**  
RESOURCE CENTER

# Understanding High-Impact Monitoring Findings for Developer/Non-SEA Grantees

September 22, 2021 | Virtual

[charterschoolcenter.ed.gov](http://charterschoolcenter.ed.gov)

# 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.



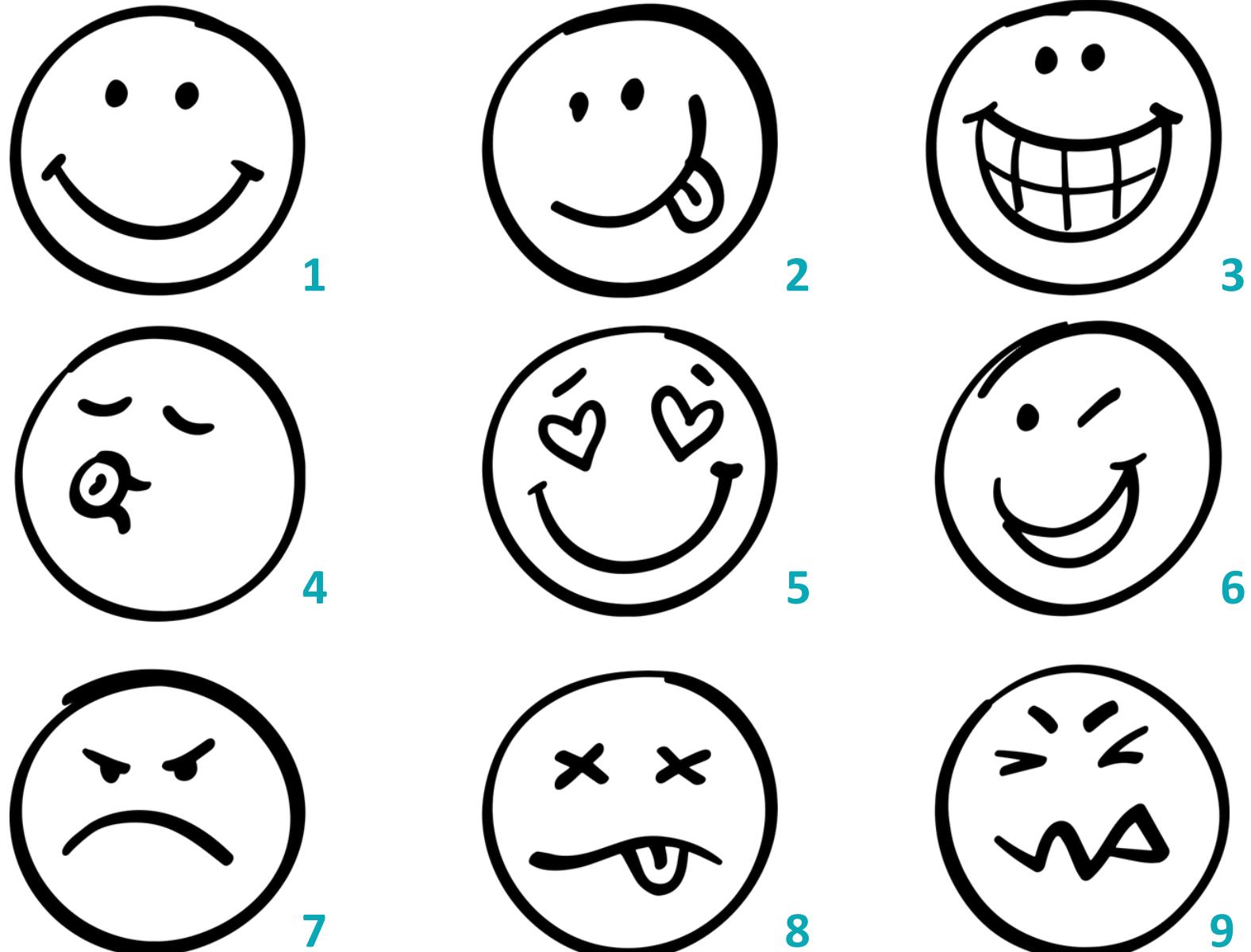
NATIONAL  
**CHARTER SCHOOL**  
RESOURCE CENTER

**MSG**  
MANHATTAN STRATEGY GROUP

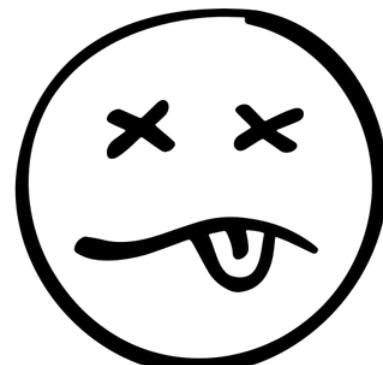
**WestEd**®  
WestEd.org

## Ice Breaker

Which emoji face best describes how you feel about monitoring?



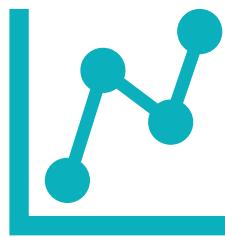
## Session Goal



# Session Objectives



Provide an overview of monitoring findings for the Developer program

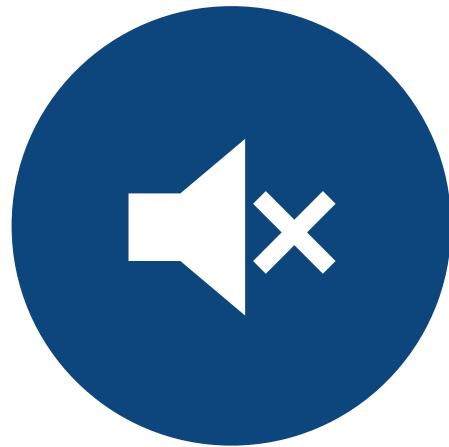


Identify those indicators with high-impact findings



Discuss existing resources and our plans for technical assistance to address high-impact findings

## Norms for Discussion



Remember to mute yourself



Utilize the chat for questions  
and comments



Respond to the survey



*This session is being recorded, so you and your peers may access it at a later date.*

**Look for the key!**

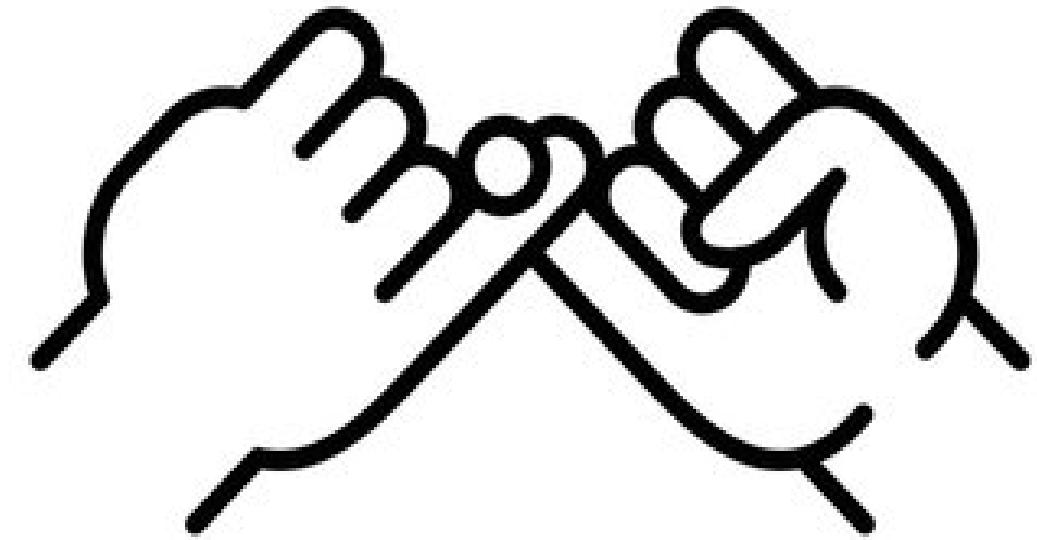


## Our Promise

We promise to answer every question that we can during this session and the accompanying office hours.

## However...

Some questions may need to be referred to your program officer for follow-up.



# Session Agenda



Purpose of Monitoring



Overview of  
Monitoring Findings for  
the Developer Program



Overview of Indicators  
with High-Impact  
Findings



Overview of Technical  
Assistance Resources



Key Takeaways



Office Hours

# Session Presenters



**Stephanie  
Jones**

U.S. Department of  
Education, Charter  
School Programs



**Porscheoy  
Brice**

U.S. Department of  
Education, Charter  
School Programs



**Leslie  
Hankerson**

U.S. Department of  
Education, Charter  
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**Sara  
Allender**

WestEd (Monitoring  
Contractor)



**Carter  
Clawson**

National Charter  
School Resource  
Center



## A Word from CSP



# What is monitoring?

# Monitoring is...

Monitoring is the regular and systematic examination of a grantee's administration and implementation of a federal education grant, contract, or cooperative agreement administered by ED.

ED policy requires every program office overseeing discretionary or formula grant programs to prepare a monitoring plan for each of its programs.



Ensure fiscal and  
programmatic accountability



Support and improve grantee  
capacity

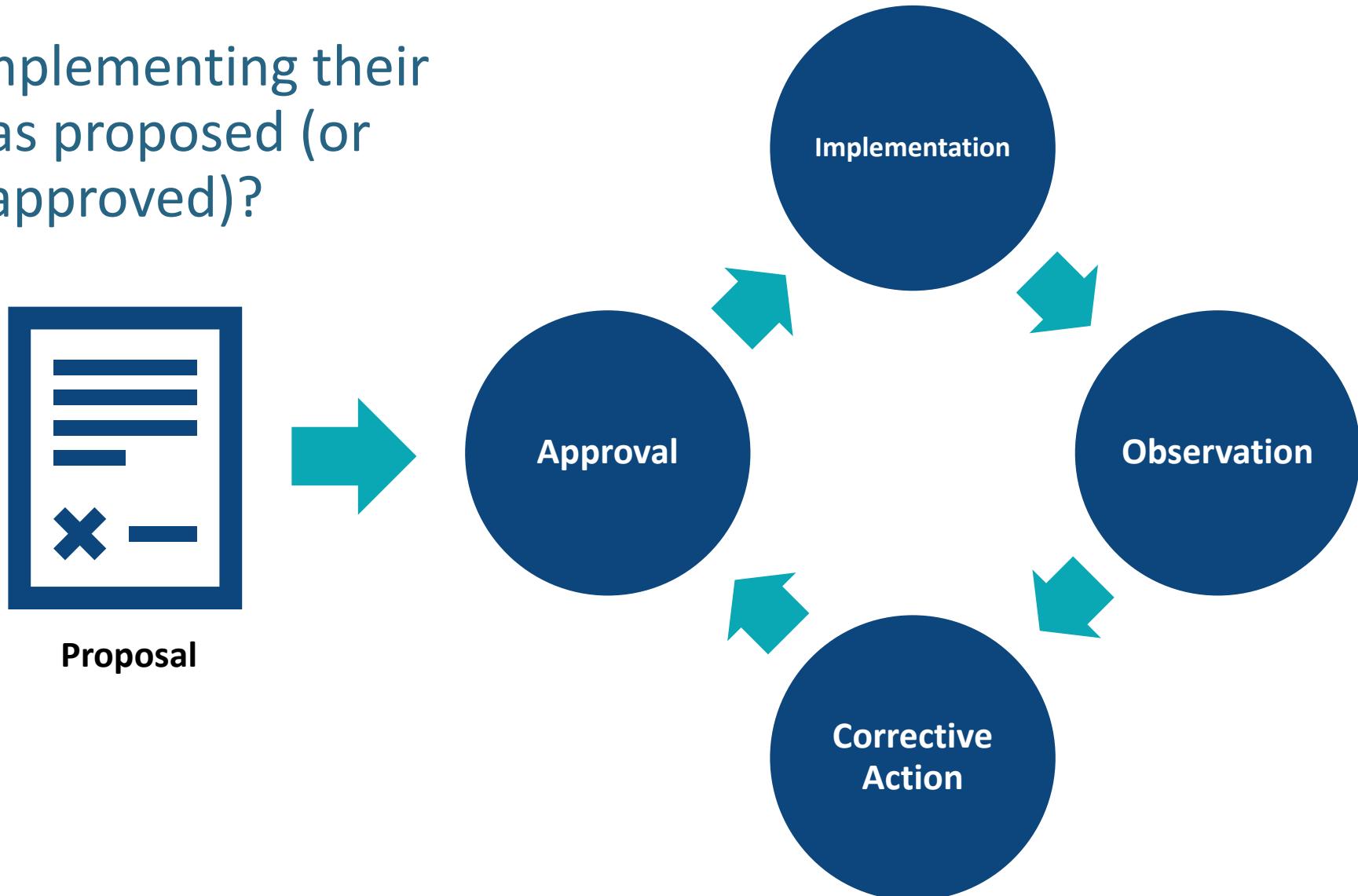


Assist grantees with effective  
planning and implementation  
of grant projects



Serve as ED's eyes and ears

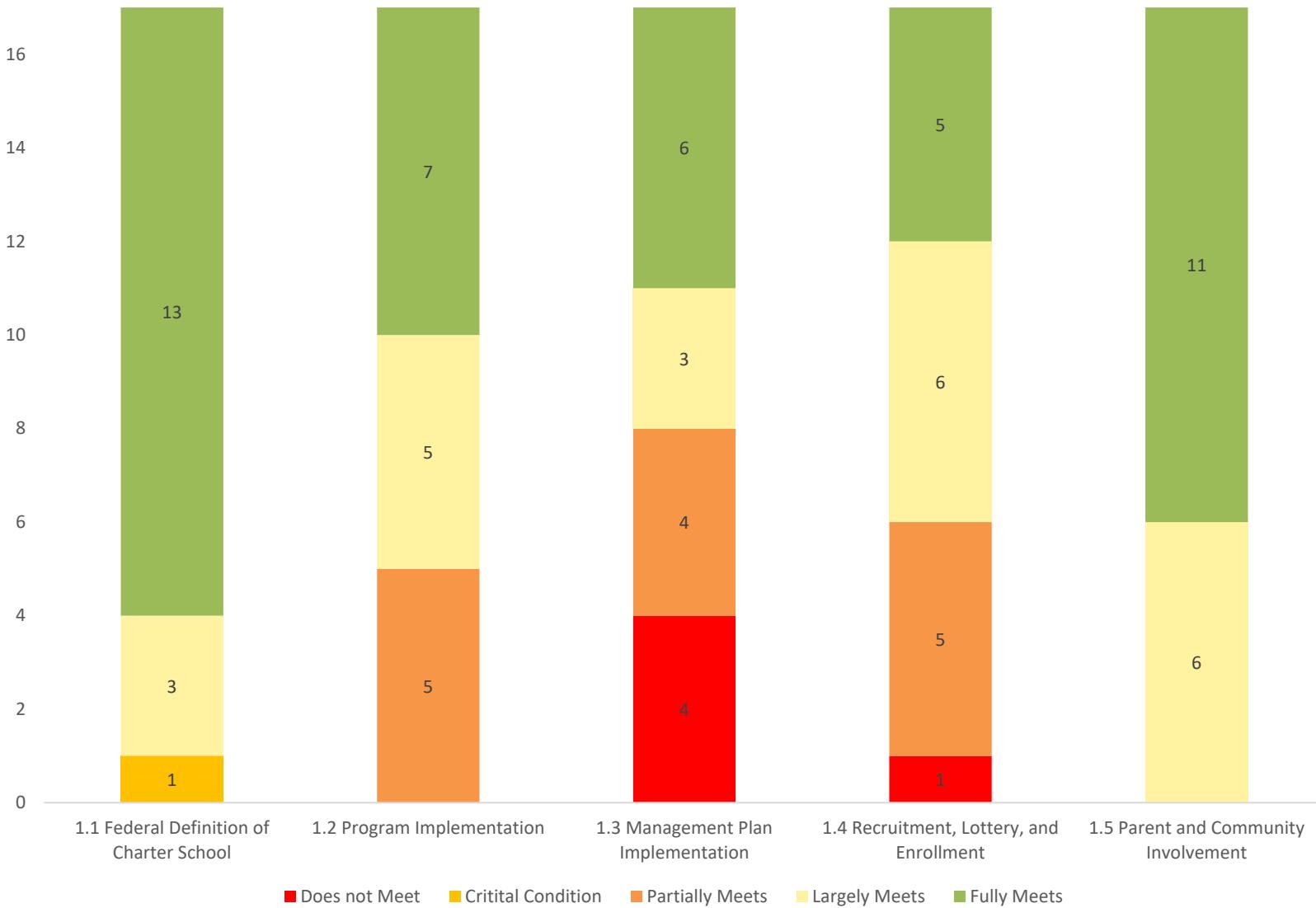
Are grantees implementing their grant projects as proposed (or amended and approved)?



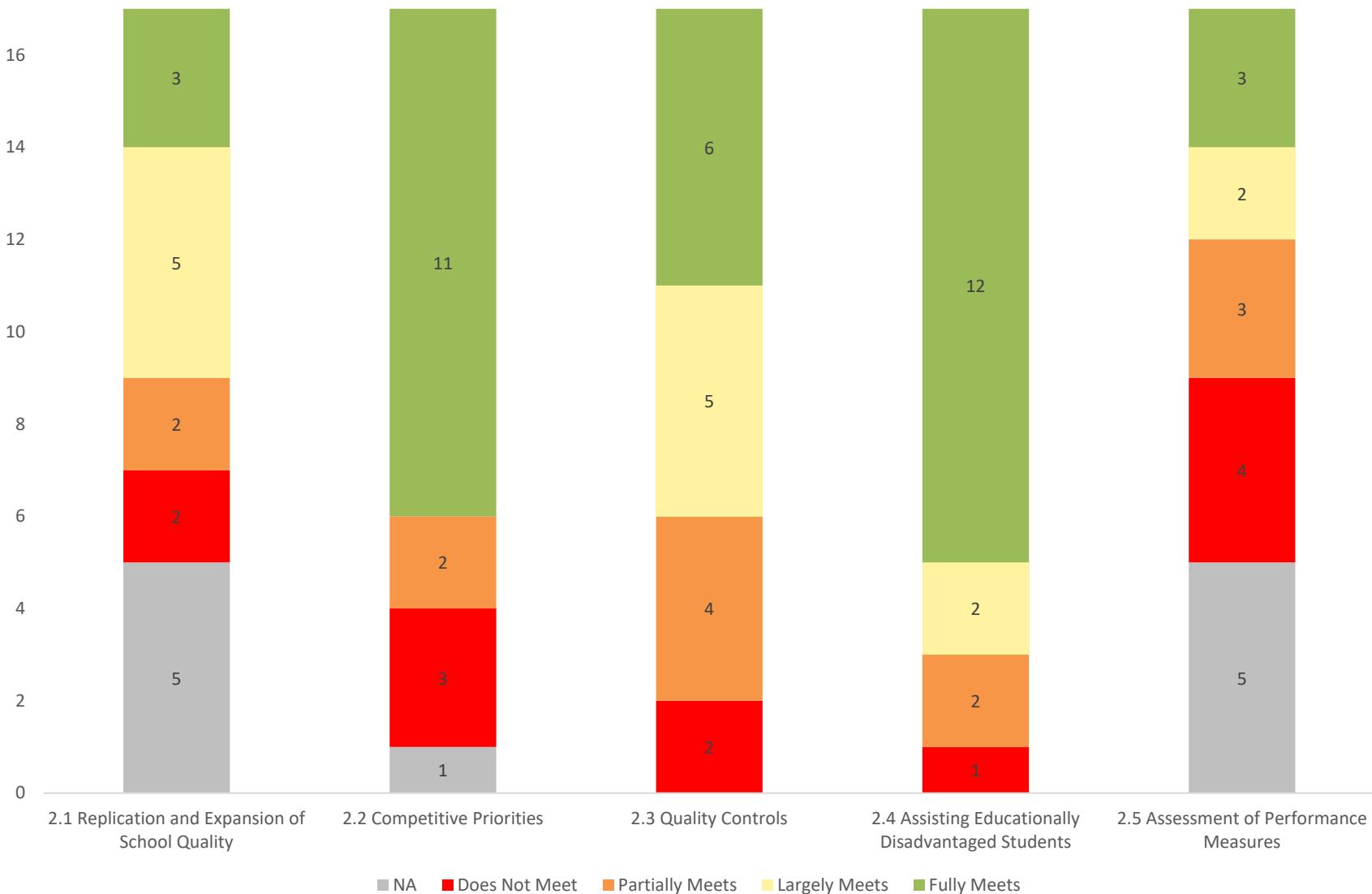


**What are the monitoring findings for the  
Developer/Non-SEA Program?**

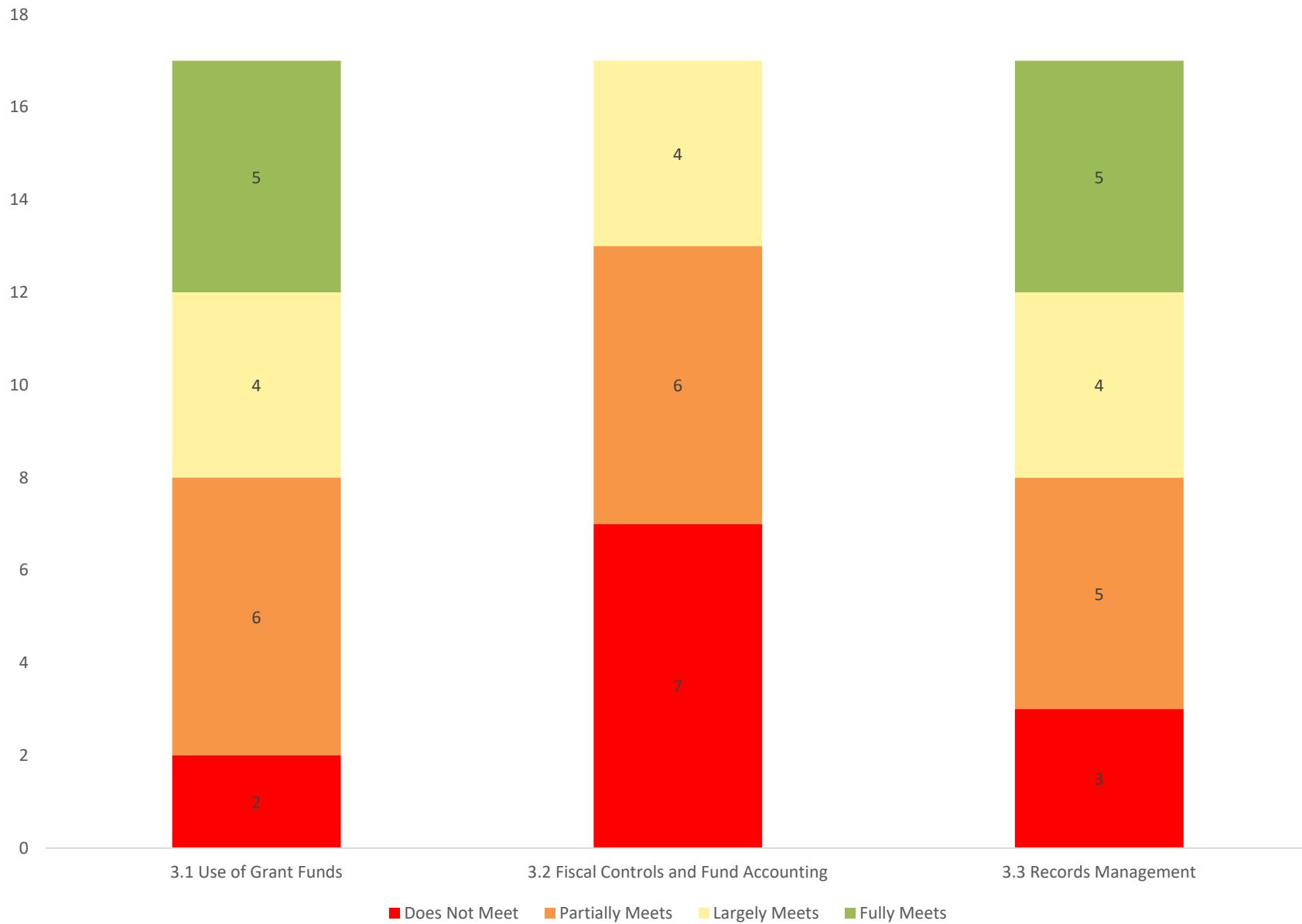
# Charter School Status and Application Fidelity



# Grantee Quality and Performance Assessment



# Administrative and Fiscal Responsibilities





## What are the *high-impact findings* for the Developer/Non-SEA program?

Our definition today for a high-impact monitoring finding across Developer grantees is it's a common finding and/or there are critical implications to risk.

# **Fiscal Control and Fund Accounting**

*Indicator 3.2*

# Fiscal Control and Fund Accounting Findings

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.

# Recipients of Federal Funds are Required to Have:

Financial management systems that provide for the identification of all Federal awards received and expended

Accurate, current, and complete discourse of financial results

Records that adequately identify the source and application of funds

Effective control over and accountability for funds, property, and assets

A comparison of expenditures with budget amount

Written procedures for procurement, allowability, and disposition of assets

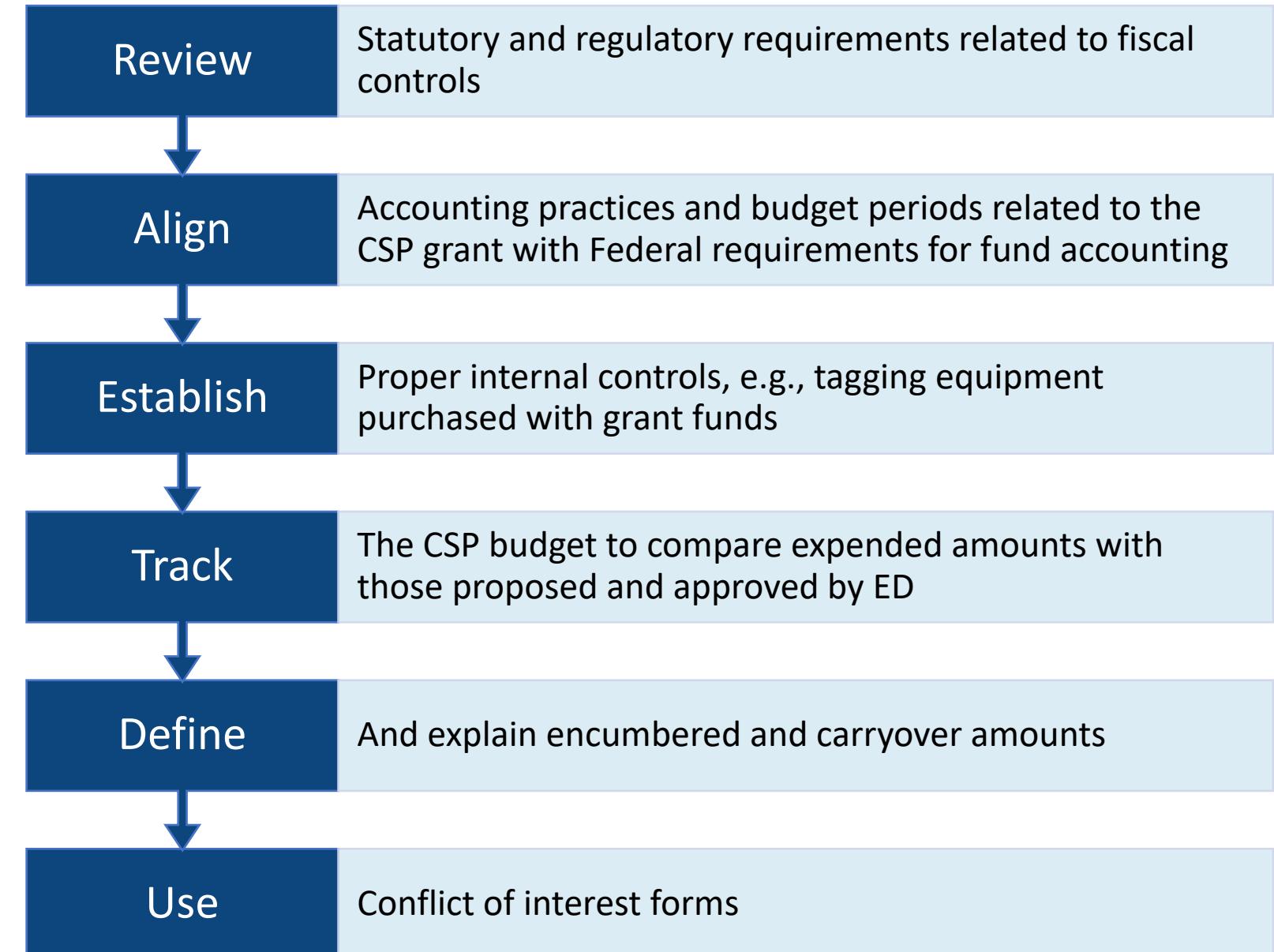
# Steps to Improve Fiscal Control and Fund Accounting



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/EWVpitfRA9JlusXq8ItOtoEBkvoq9s06UGlakTxzzgZchQ?e=C67S1u>



# **Replication and Expansion School Quality**

*Indicator 2.1*

# Replication and Expansion School Quality Findings



75% struggled to provide updated data sources similar to what was provided in approved grant applications or did not demonstrate consistent increases in performance.



Grantees typically provided most but not all of the achievement data to the monitoring team that served as evidence of their achievement gains.



Common missing data included attendance data, subgroup data, or comparisons to State data. Other grantees demonstrated decreased achievement in one subject or area, indicating minor changes from past achievement results.

# Steps to Improve Replication and Expansion School Quality



Submit student performance data to demonstrate performance and alignment with the approved application



Submit updated data to demonstrate performance and alignment with the approved application

# **Assessment of Performance Measures**

*Indicator 2.5*

# Assessment of Performance Measures Common Findings



Grantees are expected to collect and use quality data to inform their progress toward grant objectives and performance measures.



Grantees routinely struggled to demonstrate that they had adequate data collection and analysis plans in place to ensure they were able to produce reliable and valid data for performance measures reporting.



Common findings of noncompliance across grantees included that grantees had **vague performance measures**, **incomplete or missing data**, **data that was not aligned to the measure**, and **inconsistent wording of the measures**.

# Steps to Improve Assessment of Performance Measures



Track all approved performance measures locally over the project period



Report on all performance measures accurately to demonstrate performance and progress

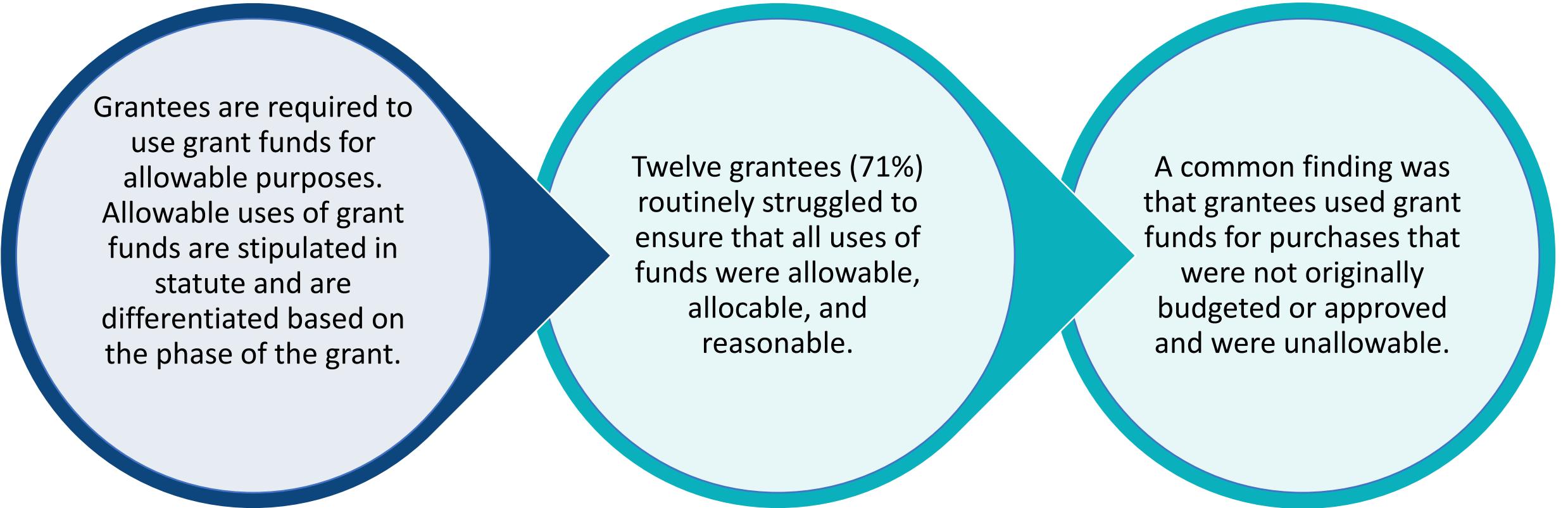


NCSRC SMART Toolkit --  
<https://charterschoolcenter.ed.gov/publication/smart-objectives-toolkit->

# **Use of Grant Funds**

*Indicator 3.1*

# Common Findings Related to Use of Grant Funds



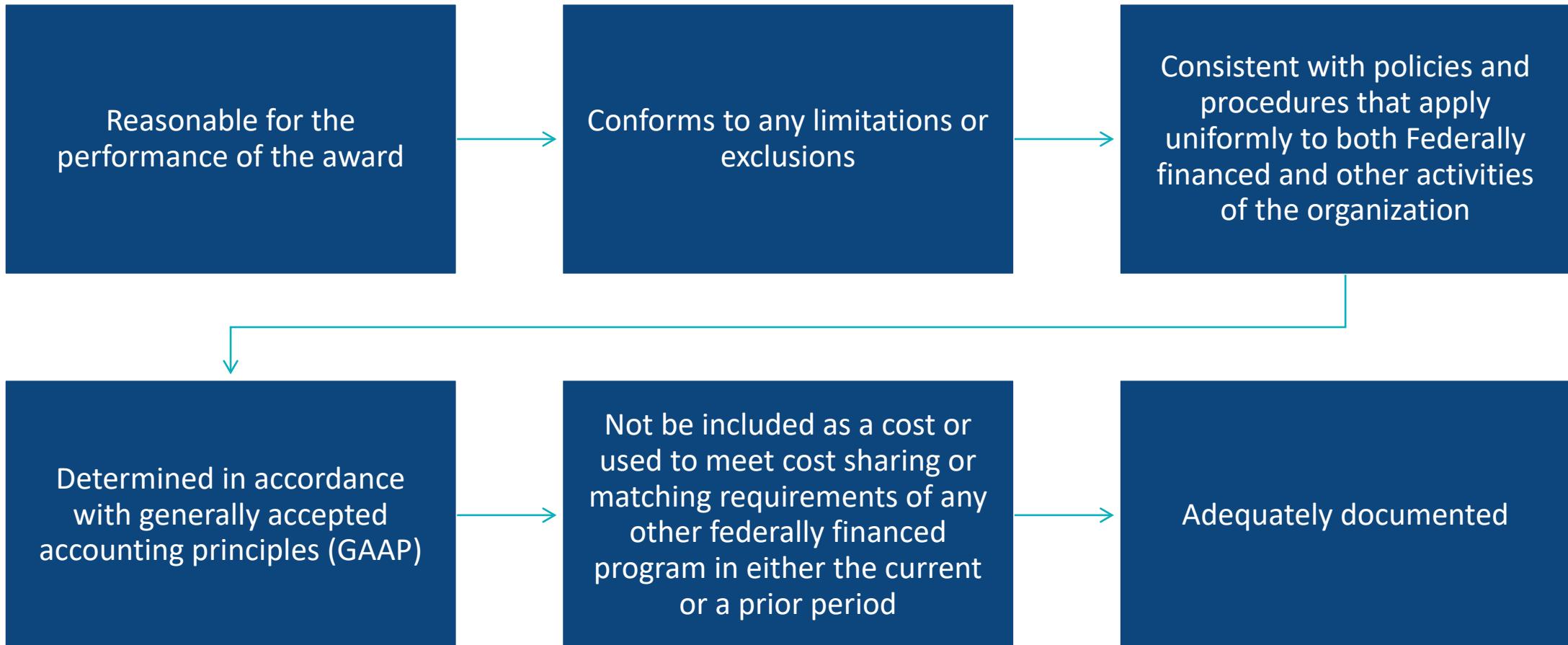
Grantees are required to use grant funds for allowable purposes. Allowable uses of grant funds are stipulated in statute and are differentiated based on the phase of the grant.

Twelve grantees (71%) routinely struggled to ensure that all uses of funds were allowable, allocable, and reasonable.

A common finding was that grantees used grant funds for purchases that were not originally budgeted or approved and were unallowable.



# Is It Allowable?



## Is It Allocable?



Incurred specifically for the award



Benefits both the award and other work, and can be distributed in reasonable proportion to the benefits received



Necessary to the overall operation of the organization, although a direct relationship to any particular cost objective cannot be shown



Not prohibited under the grant

## Is It Reasonable?



Does not exceed that which would be incurred by  
a prudent person under the circumstances  
prevailing at the time the decision was made to  
incur the costs

# Steps to Improve Use of Grant Funds

## Refer

Refer to use of grant funds guidance and resources and well as guidance on limits on the use of funds for personnel costs

## Rely

Rely on allowable, allocable, and reasonable costs definitions

## Communicate

Communicate with ED when budget changes may be necessary, and obtain approval BEFORE making changes

## Familiarize

Familiarize yourself with the amendment process



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>

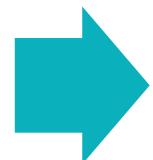
# **Records Management**

*Indicator 3.3*

# Records Management Findings



Grantees are expected to maintain adequate grant files to ensure effective record keeping.

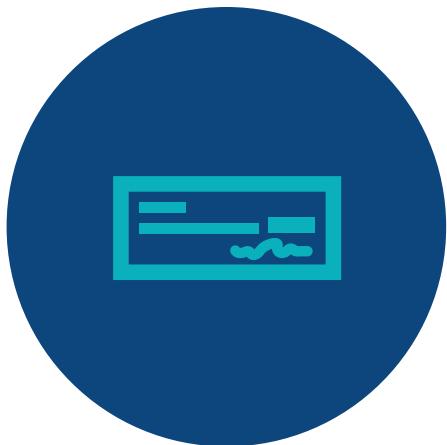


29% of grantees maintained and retained all of their grant-related documents appropriately and complied with the indicator requirements



Findings included **not maintaining complete CSP records**, including APRs, correspondence with the Program Officer, or financial records and **not having record retention policies** that included the required time period.

# Steps to Improve Records Management



Maintain financial and programmatic records, supporting documents, statistical records, and other records related to grant funds for grant monitoring and audit purposes

Create records retention policies that include the required time period

Share policies with proper staff



§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>

# **Recruitment, Lottery, and Enrollment**

*Indicator 1.4*

# Recruitment, Lottery, and Enrollment Findings



This indicator examined grantee efforts to inform students and families about the charter school and to ensure that students have equal access to attend.

Five of the 17 grantees (29%) complied with the requirements of this indicator

Critical to this indicator is an examination of a grantee's marketing, outreach, lottery, and enrollment procedures.

Common findings were that grantees did not have written lottery policies or procedures and they did not highlight their commitment to meet the needs of all students in recruitment materials.

# Steps to Improve Practices Related to Recruitment, Lottery, and Enrollment

## Review

- Review the Federal lottery policy and non-regulatory guidance

## Document

- Document lottery procedures, including preferences and weighted lotteries, and seek ED approval for changes



CSP Nonregulatory Guidance --  
<https://www2.ed.gov/programs/charter/fy14cspnonregguidance.doc> (page 17)

# **Management Plan Implementation**

*Indicator 1.3*

## Common Findings Related to Management Plan Implementation

Results from monitoring visits found that the implemented management structure often varied from what most grantees proposed in the application and that, in many cases, those changes were not effectively communicated to Program Officers.



Grantees are required to manage their grant as proposed.



Many grantees demonstrated limited or insufficient Board oversight.



Changes in the role of Project Director proved an issue because grantees did not maintain or provide the monitoring team with documentation of ED approval for the change in key personnel.

# Steps to Improve Management Plan Implementation



Implement the proposed management plan,  
including board oversight of the school



Maintain documentation of approved changes  
to the project director

# **Quality Controls**

*Indicator 2.3*

# Common Findings Related to Quality Control

Quality controls covered in this indicator include whether a measurement of school performance is included in an approved charter or performance contract; student performance is one of the most important factors for renewal or revocation; other financial, structural, or operational factors are included in renewal or revocation; and grantee policies related to school closure.



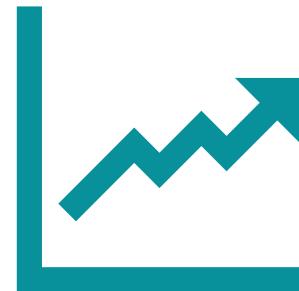
Grantees that did not fully meet the indicator lacked a written policy for school closure or a policy for student placement in other high-quality schools in the event of school closure or both.

Another common finding was that some grantee contracts with their authorizers did not state how student performance would be measured.

# Steps to Improve Quality Controls



Maintain 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



Ensure authorizer agreements include performance metrics for students and school operations and a charter renewal process

# Program Implementation

*Indicator 1.2*

# Common Findings Related to Program Implementation

Grantees are required to demonstrate that they implemented their educational program as described in their approved CSP application.



The vast majority of findings stemmed from grantees not implementing their educational programs as proposed and approved.



Common findings included grantees not serving the intended grades and students as proposed, not serving the intended grades or expanding the number of seats, not offering the proposed professional development, and not implementing the proposed curriculum.

# Steps to Improve Program Implementation

## Implement

Implement the proposed and approved educational program (e.g., targeted number of students, approved curriculum, professional development as proposed)

## Initiate

Initiate regular communication with your program officer about delays, challenges, changes, and highlights



NCSRC Logic Model Toolkit --

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



**What technical assistance is recommended  
or available to support Developer grantees?**



## Recommended Areas of Technical Assistance

Provide guidance on statutory and regulatory requirements related to fiscal controls

Support FY 2018 grantees to develop measurable performance measures

Identify multiple ways to communicate with grantees regarding appropriate uses of grant funds

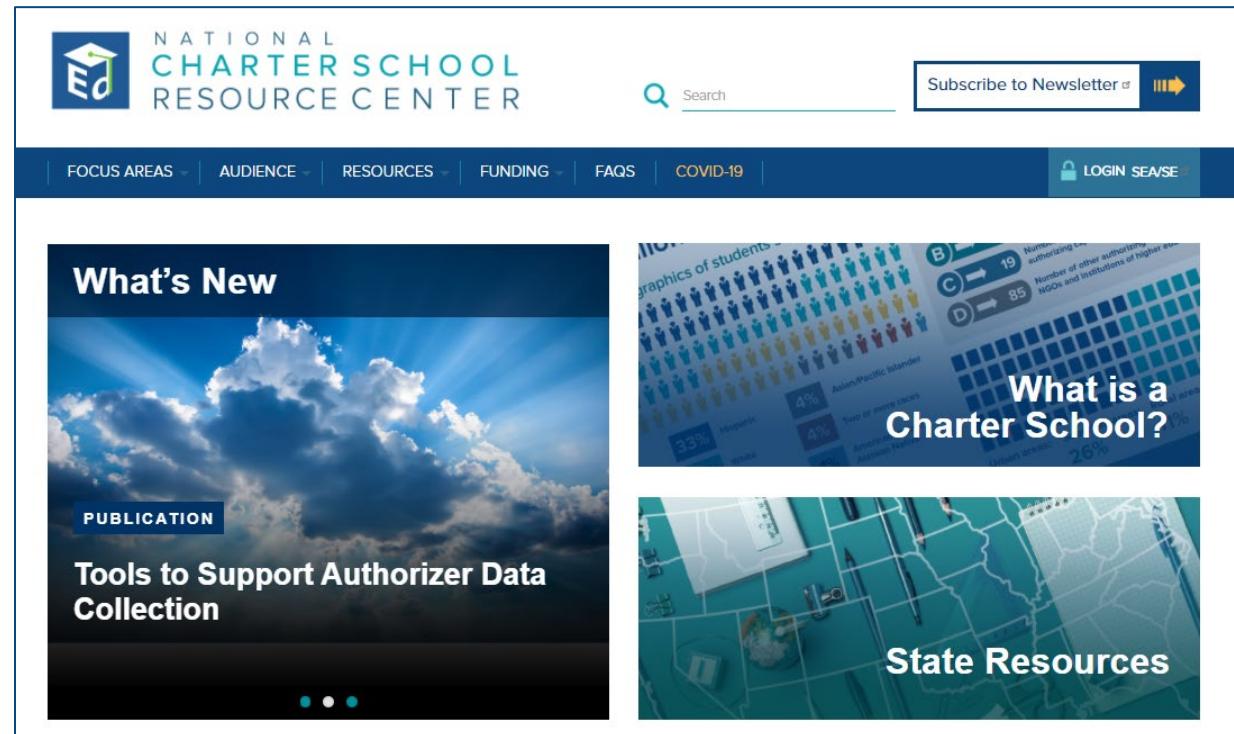
Reinforce the requirements for grant recordkeeping

Train grantees on CSP grant oversight

# The National Charter School Resource Center

NCSRC:

1. Serves as a national hub of information and resources for the sector; and
2. Provides technical assistance (TA) to you and other CSP grantees to assist in overcoming grant implementation challenges.



# NCSRC TA Strategy

All NCSRC support for grantees is:

- Guided by high leverage themes based on grantee needs, sector challenges, and CSP priorities.
- Offered through multiple modalities.
- Responsive to changing and emerging needs.
- Provides ample opportunity for grantee feedback.



# How Does CSP and NCSRC Determine TA Activities?

Needs Assessment Data

CSP Priorities

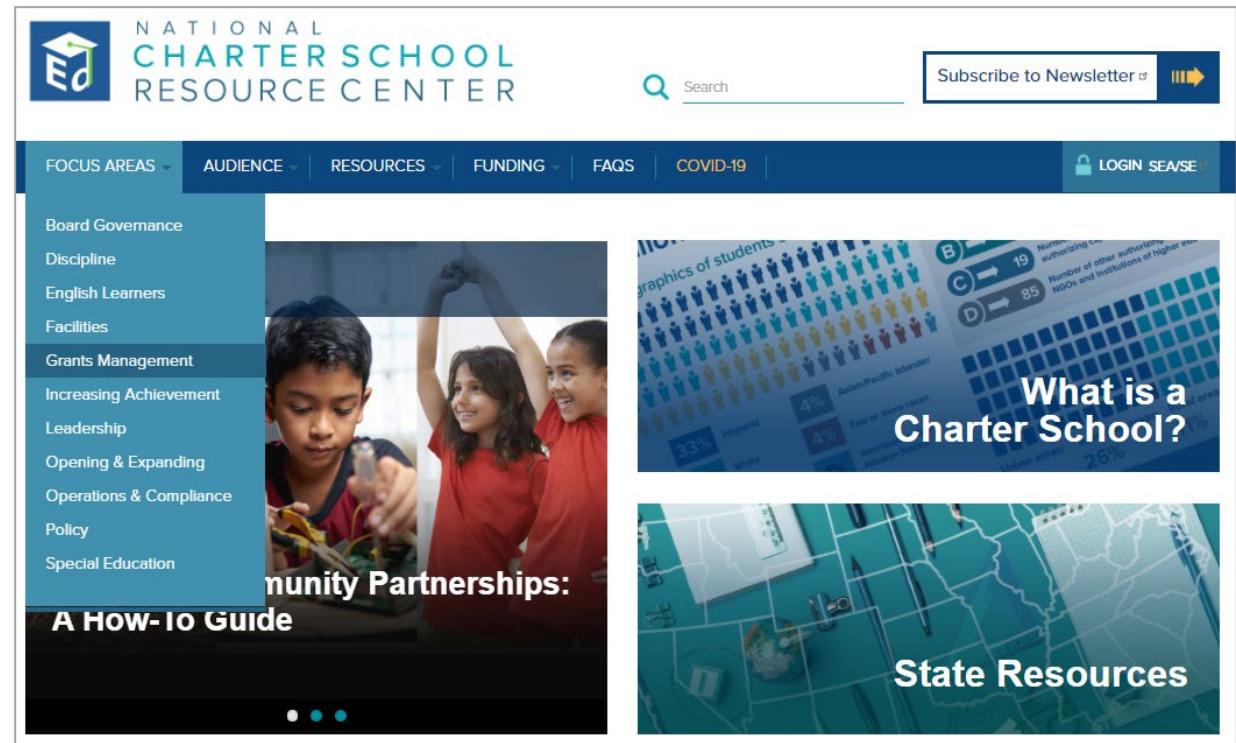
Monitoring Reports

## Existing TA Resources & Webinars

- ✓ SMART Objectives Toolkit (& Accompanying Webinar)
- ✓ Logic Model Toolkit
- ✓ What to Expect When Getting Monitored
- ✓ Ten Things We Learned from Monitoring
- ✓ Administering Ed Grants (on fiscal accountability & internal controls)
- ✓ Indirect Costs Decoded
- ✓ Grants Training and Management Resources Online Grants Training Courses  
(U.S. Department of Education)

# Existing Resources Are Easy to Find on the NCSRC Website!

- NCSRC website features a landing page for all toolkits and webinars related to grants management.
- From the homepage, click “FOCUS AREAS” and “Grants Management”.



[charterschoolcenter.ed.gov](http://charterschoolcenter.ed.gov)

## Existing TA Resources: Individualized Grantee Support

NCSRC also offers individualized TA to *select* grantees as assigned by CSP on:



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SMART performance measures

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Grants Administration Challenges  
(e.g., internal controls, APR support)

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Monitoring CAPs

# Existing TA Resources: The PD Meeting

Developer sessions from the February 2021 PD meeting are viewable on Socio.

**Note:** In our survey seeking grantee feedback for the next PD meeting, **tools for effective grants management** is the #1 topic request, which we will heed.

The screenshot shows the Socio platform interface for the "Charter School Programs Grantees" meeting, which took place from Feb 17 - 25, 2021. The left sidebar includes links for Home, Connections, and Messages. The main area displays the meeting agenda with various sessions and their recordings. The agenda is as follows:

- 12:00 PM - 1:00 PM: Replication and Expansion/CMO Day One (60 attendees, Video Stream, View Recording)
- 12:00 PM - 1:30 PM: National Dissemination Day One (20 attendees, Video Stream, View Recording)
- 2:00 PM: Non-SEA/Developer Day One (25 attendees, Video Stream, View Recording)
- 2:00 PM: State Entity (SE) Day One (45 attendees, Video Stream, View Recording)
- 3:45 PM: State Entity (SE) FY21 Annual Performance Report: Instructions and Overview (42 attendees, Video Stream, View Recording)

# CSP Developer Guidebooks

- CSP Developer Grant Kickoff Guidebook – *Coming Soon*
  - Some chapters will be useful for existing grantees.
- CSP Developer Grant Implementation Guidebook and Learning Modules – *A Possibility in the Future*
  - Focused on ongoing activities and common challenges related to ongoing grant implementation.
  - Asynchronous webinars related to each chapter of the guidebook will explore essential practices for success and offer CSP, NCSRC, and monitor office hours.

## *Proposed Future TA – Give Us Your Feedback!*

- Mandatory, ongoing training for new PDs [aligned with a lasting resource/toolkit]
- Guidance on statutory and regulatory requirements related to fiscal controls
- Requirements for grant recordkeeping
- Training on CSP grant oversight
- Multiple ways to communicate regarding appropriate use of funds
- PD Meeting Session + Tip Sheet on Tracking & Reporting Progress (+ tips for APR & FPR).
- Monitoring Guidebooks (accompanied by an annual webinar on preparing for monitoring)
- Annual Webinars on Monitoring Findings (like this webinar)





**What are my key takeaways from this  
webinar?**

# Key Takeaways



Don't go it alone.



Get familiar with your grant application and requirements, as well as ED regulations.



Codify grant project changes and get CSP approval.



Ask questions. Help is available.



Be prepared.

How are you feeling  
NOW about  
monitoring?



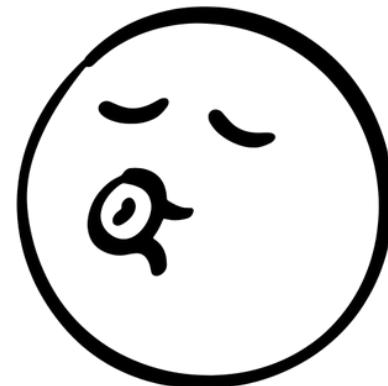
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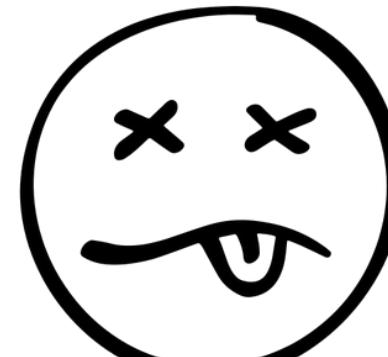
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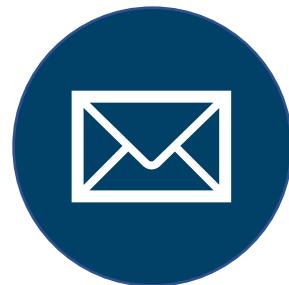
# How did we do?



## How can you contact NCSRC?



[charterschoolcenter.ed.gov](http://charterschoolcenter.ed.gov)



[contact-us@charterschoolcenter.org](mailto:contact-us@charterschoolcenter.org)

## Office Hours

Have more questions?  
Stay on for a 30-minute  
optional Office Hours.





THANK YOU!

