Understanding High-Impact Monitoring Findings for SE Grantees

July 21, 2021 | Virtual

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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.

Ice Breaker

Which emoji face best describes how you feel about monitoring?

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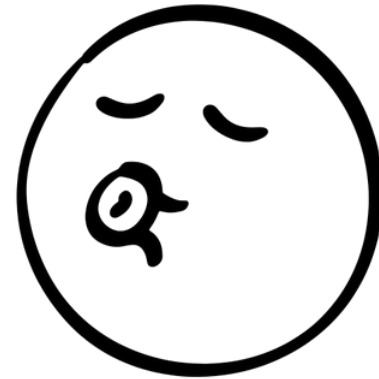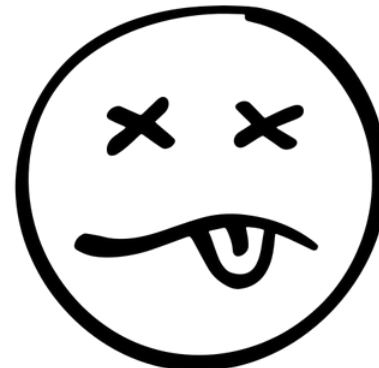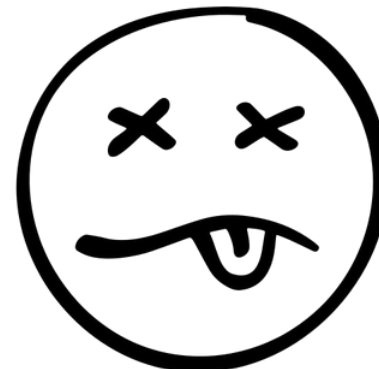
Session Objective

Session Objectives

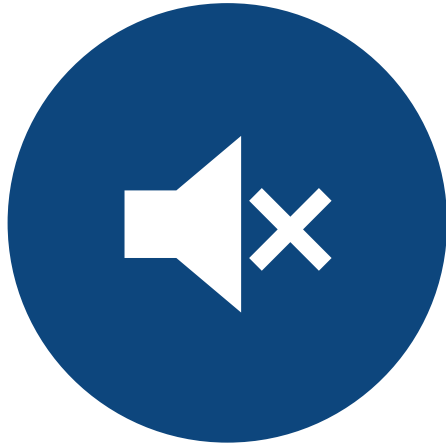Provide an overview of monitoring findings for the SE program

Identify those indicators with high-impact findings

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

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Norms for Discussion

Look for the key!
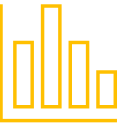
Remember to mute yourself

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.

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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.

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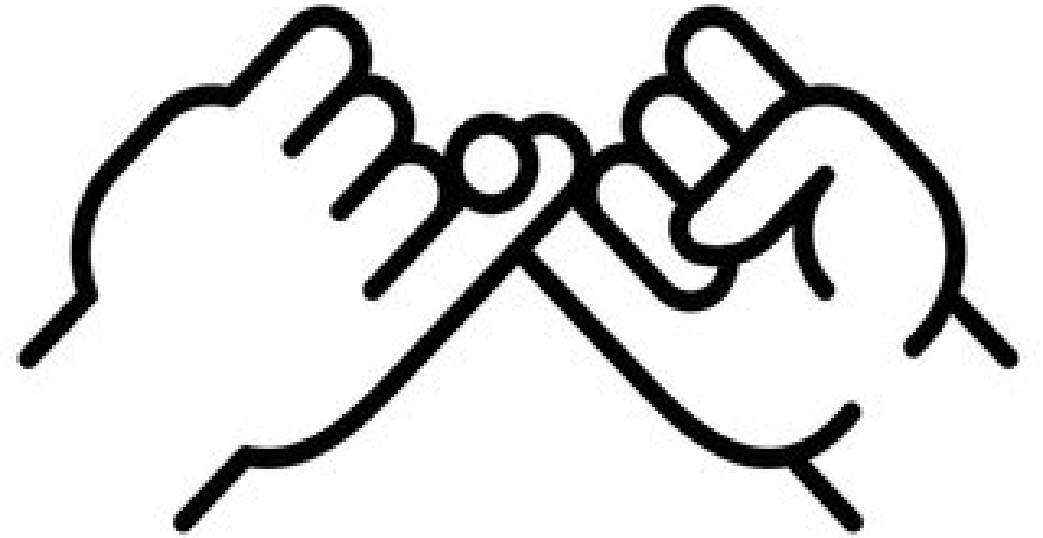
Session Agenda

Purpose of Monitoring

Overview of Monitoring Findings for the SE Program

Overview of Indicators with High-Impact Findings

Overview of Technical Assistance Resources

Key Takeaways

Office Hours

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Session Presenters

Jennifer Todd

U.S. Department of Education, Charter School Programs

Ashley Gardner

U.S. Department of Education, Charter School Programs

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

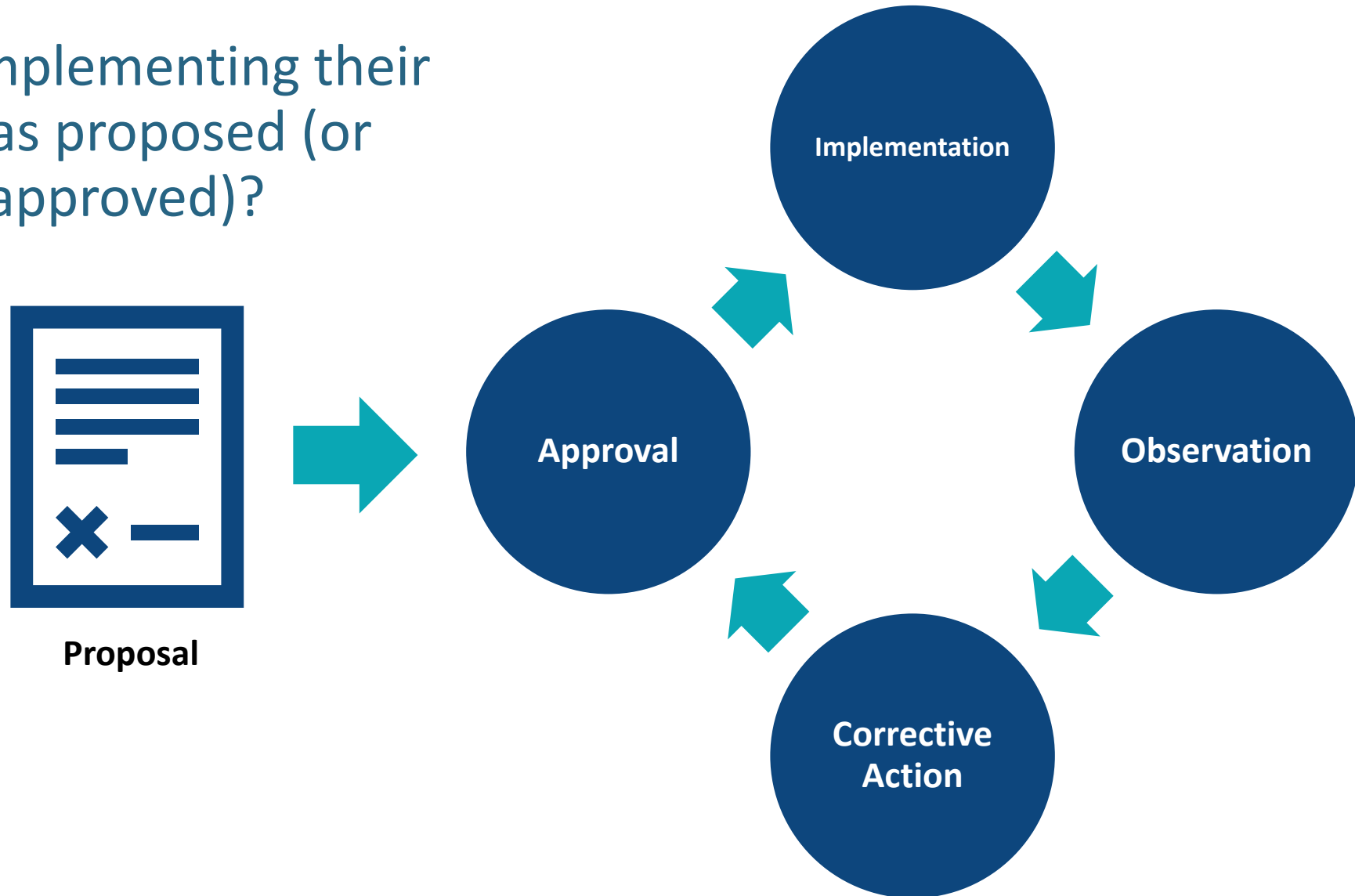Assist grantees with effective planning and implementation of grant projects

Serve as ED's eyes and ears

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

Proposal

Approval

Implementation

Observation

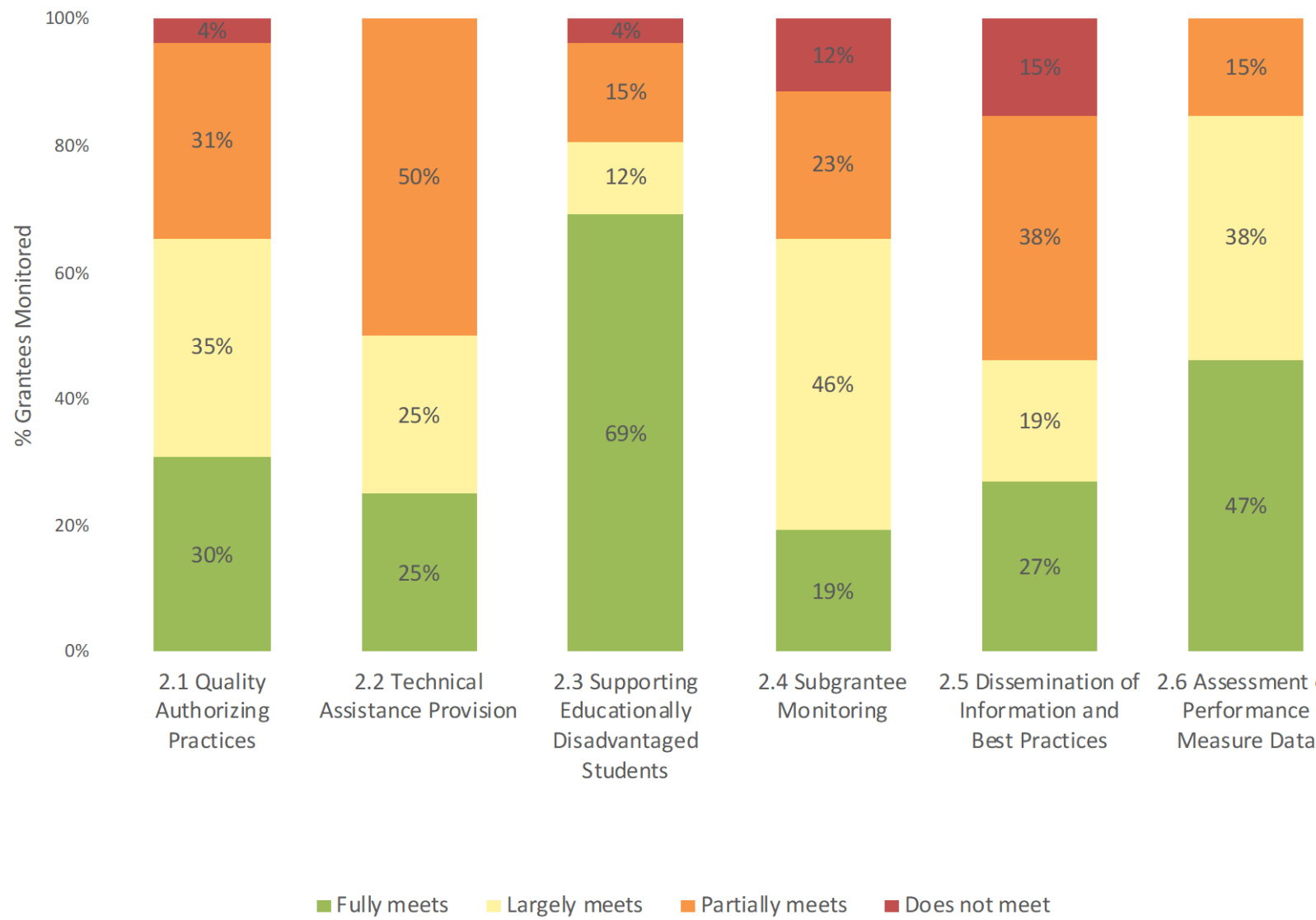**Corrective Action**

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What are the monitoring findings for the SE program?

Subgrant Application and Award Process
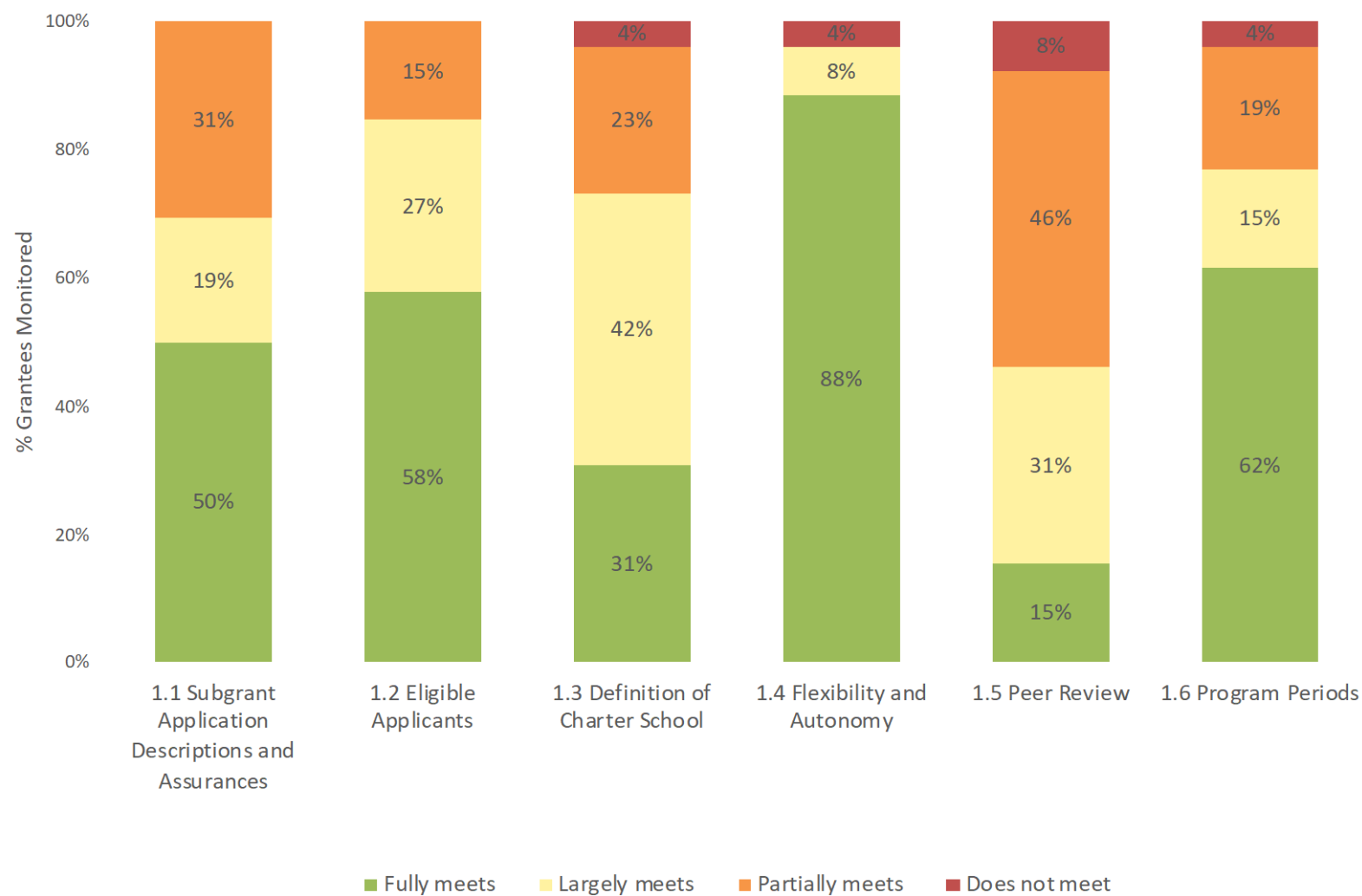
Supporting High-Quality Charter Schools

Administrative and Fiscal Responsibilities
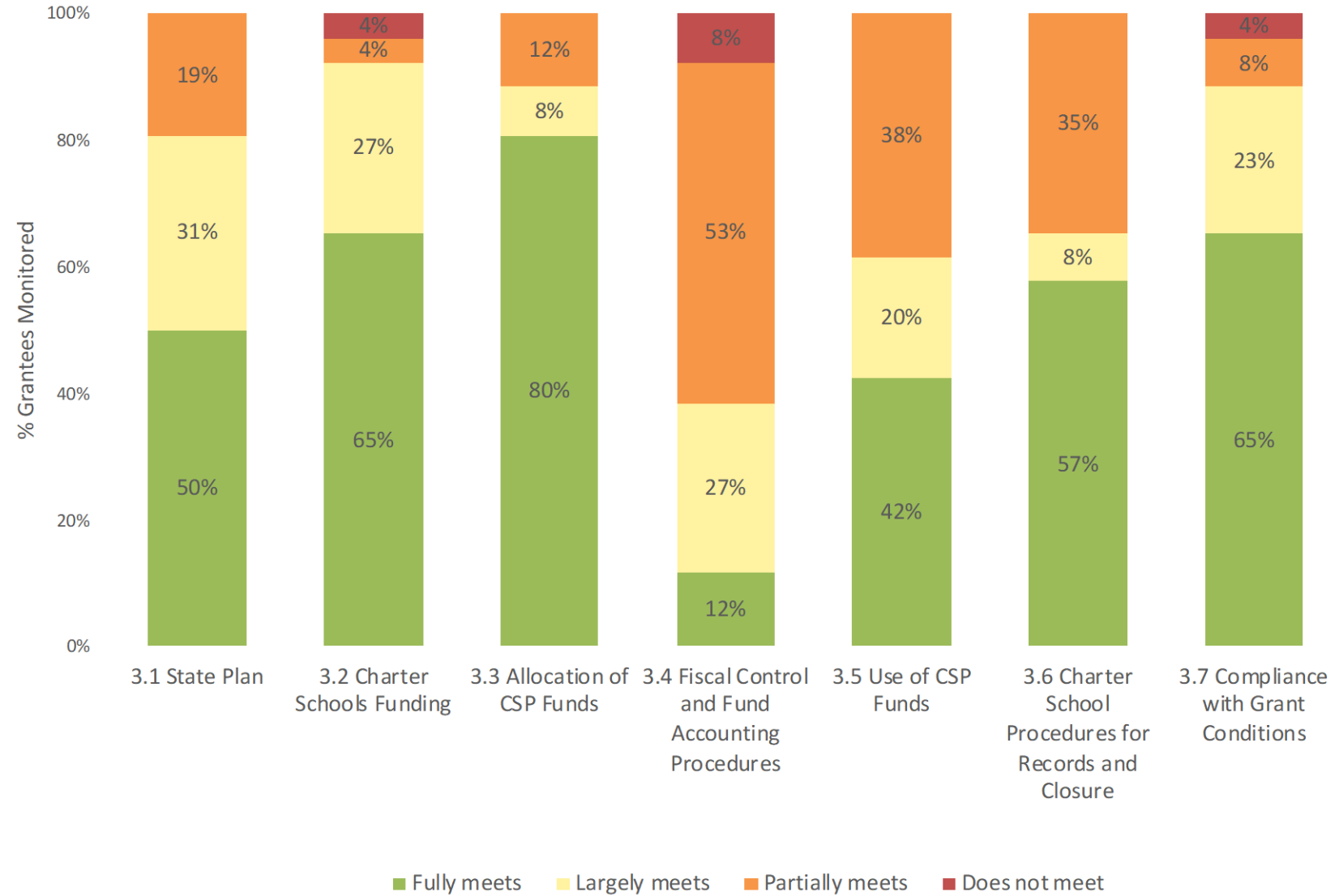
Oversight of Management Organization Relationships

% Grantees Monitored

4.1 Mitigating Risk of Charter School Relationships with Management Organizations
- Corrective action required: 5%
- Requires TA: 15%
- Recommends TA: 65%
- No recommendation: 15%

4.2 Oversight of EDFacts Data Collection for Management Organizations
- Requires TA: 16%
- Recommends TA: 11%
- No recommendation: 73%

Legend: ■ No recommendation ■ Recommends TA ■ Requires TA ■ Corrective action required

What are the high-impact findings for the SE program?

Subgrant Application Peer Review

Indicator 1.5
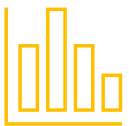
Subgrant Application Peer Review Findings

22 of 26 grantees (85%) were not in compliance with the requirements of this indicator. All grantees were using some form of peer reviewers 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**.

Steps to Improve Peer Review Process

Document	Document the subgrant application peer review process
Provide	Provide adequate peer reviewer training
Create	Create process for scoring rubrics and norming within and across peer review panels
Ensure	Ensure a fair and open process, including sufficient and consistent criteria for awarding subgrants
Mitigate	Mitigate possible challenges
Communicate	Communicate process changes to the program officer

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Subgrantee Risk Assessment and Monitoring

Indicators 1.3 and 2.4

Subgrantee Risk Assessment and Monitoring Findings

Definition of a Charter School: 18 of 26 grantees (69%) were not in compliance.

- While most grantees ensure that applicants met the Federal definition of a charter school at 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 CSP funding.
- **Common issues were related to school lottery policies that did not align with existing Federal guidance**.

Subgrantee Monitoring: 21 of 26 grantees (81%) were not in compliance.

- Grantees **struggled to take sufficient steps to ensure that subgrantees continue to meet the Federal definition of a charter school** (as noted to the left) and adhere to CSP assurances throughout duration of 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**.

Steps to Improve Subgrantee Risk Assessment and Monitoring

Conduct and document risk assessments

Document the monitoring process

- Monitoring plan
- Established training program for monitors
- Aligned monitoring materials and/or rubrics to assess the programmatic and fiscal aspects of subgrantees

Monitor specifically for the CSP requirements

- Focus on definition of a charter school, especially related to lottery policies that do not align with existing Federal guidance
- Ensure subgrantees adhere to CSP assurances throughout grant

Document Corrective Actions

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Internal Controls

Indicators 2.1, 2.2, 2.5, 3.4, 3.5, and 4.1

Quality Authorizing Practices (Indicator 2.1)

18 of 26 grantees (70%) were not in compliance 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.**

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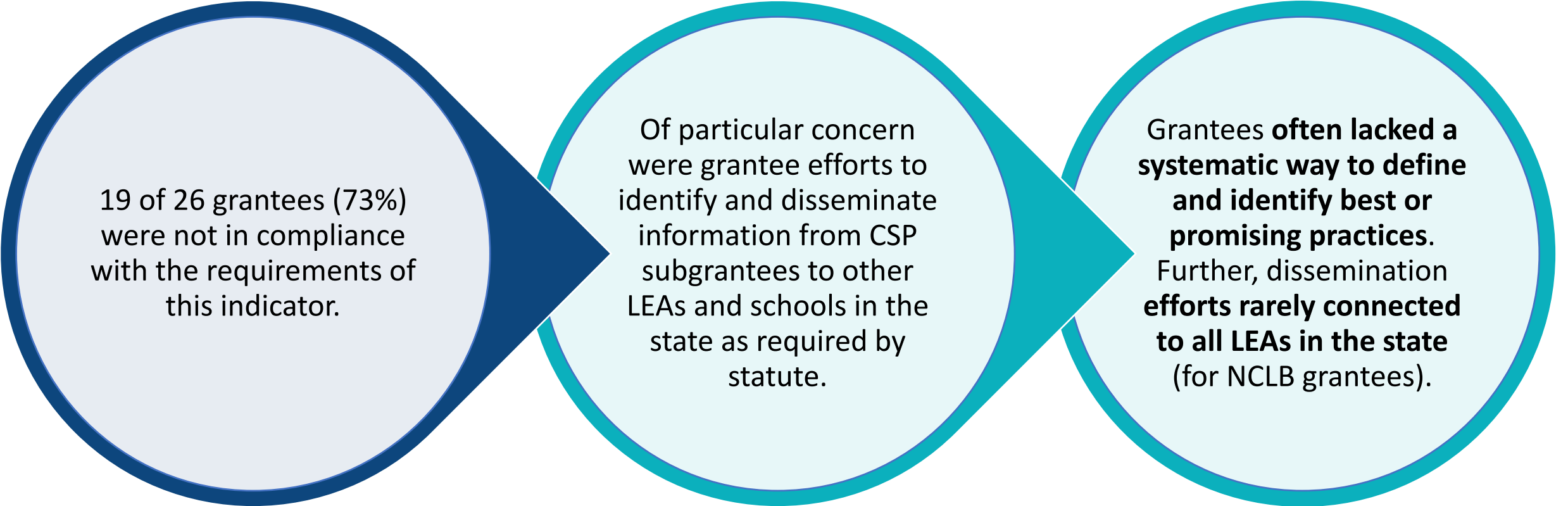
Technical Assistance Provision (Indicator 2.2)

6 of 8 grantees (75%) were not in compliance. Many of the compliance issues related to grantees who were either **slow to implement their proposed technical assistance plans** or grantees who **changed their proposed approaches without approval from ED**.

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 CSP.

Dissemination of Information and Best Practices (Indicator 2.5)

19 of 26 grantees (73%) were not in compliance 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** (for NCLB grantees).

Fiscal Control and Fund Accounting Procedures (Indicator 3.4)

23 of 26 grantees (88%) were not in compliance. All grantees were able to demonstrate 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%) were not in compliance with the requirements of this indicator.

→

Several NCLB grantees **failed to provide subgrantees with clear guidance on allowable expenses**, particularly related to planning and design versus implementation program periods, which resulted in unallowable fund use by subgrantees.

→

Issues with **use of funds for ESSA grantees typically related to approving budgets with or reimbursing subgrantees for expenses not allowed under the grant.**

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Mitigating Risk of Charter School Relationships with Management Organizations (Indicator 4.1)

17 of 20 grantees (85%) were not in compliance 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 management organization that aligned with the Federal definition**.

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5 Key Steps to Improve Internal Controls – State Level

Provide TA with funds available through 7% TA provision

Provide subgrantees with clear allowable cost guidelines

Create and implement process for reviewing subgrantees expenditures and ensure alignment w/allowable costs and subgrantee payment requests

Ensure planning and design versus implementation program periods are followed (NCLB) to mitigate unallowable fund use by subgrantees

Ensure adequate internal controls regarding CMOs using a definition of a management organization that is aligned with the Federal definition

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3 Steps to Improve Internal Controls – Subgrantees

Ensure subgrantees have proper internal budget and accounting controls in place

⬇

Create budget controls and a process for reviewing drawdowns from subgrantees for allowability of expenditures

⬇

Focus on disposition and depreciation of assets

What technical assistance is recommended to support SE grantees?

Recommended Areas of Technical Assistance for SEs

Subgrant application requirements	Peer review processes, including training and consistent use of scoring rubrics	Subgrantee monitoring processes, including training and follow-up procedures	SMART project objectives and measures as well as consistent performance measurement
Fiscal controls and fund accounting procedures and use of Uniform Guidance	Promising practices including definition, identification, and dissemination	7% allocation for technical assistance within the grant	Required reporting as it relates to management organizations

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What technical assistance is currently available to support SE grantees?

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.
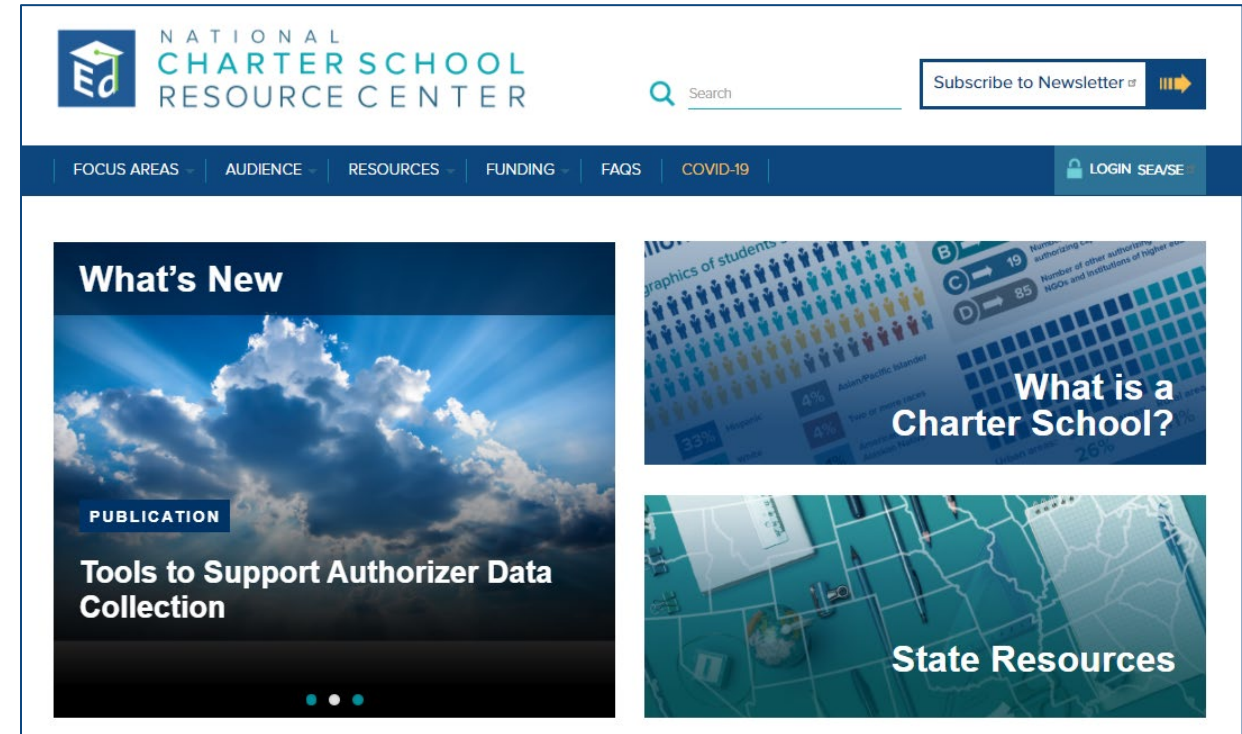
NCSRC TA Strategy

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

✓ SMART Objectives Toolkit (& Accompanying Webinar)

✓ Logic Model Toolkit

✓ Subgrantee Monitoring Checklist

✓ Peer Review Plan Elements Checklist

Existing TA Webinars

1. [What to Expect When Getting Monitored](#)
2. [Ten Things We Learned from Monitoring](#)
3. [Peer Consultancy: Designing Peer Reviews and Subgrant Competitions](#)
4. [Administering Ed Grants (on fiscal accountability & internal controls)](#)
5. [Indirect Costs Decoded](#)
6. [Peer Consultancy: Allowable Expenses](#)

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".
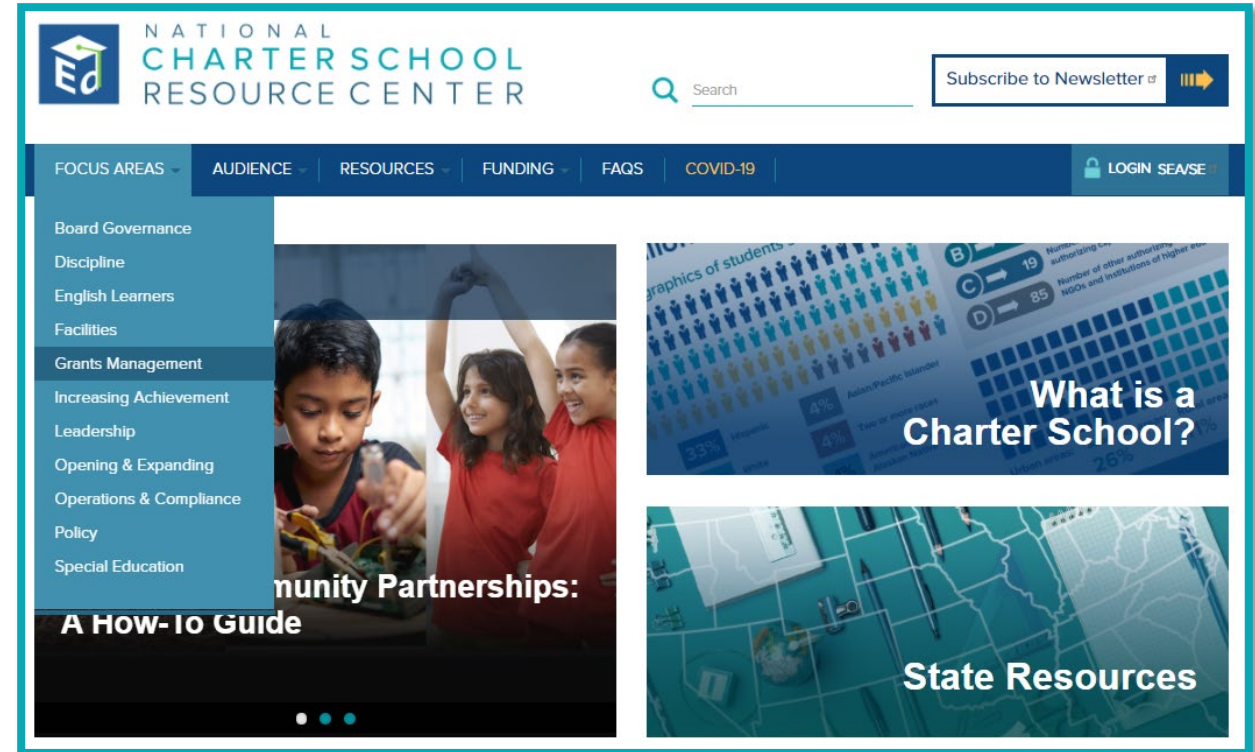
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Existing TA Resources: Individualized Grantee Support

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

SMART performance measures

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

Monitoring CAPs

High-Quality Authorizing Practices

Existing TA Resources: The PD Meeting

SE 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.

Existing TA Resources: Your SE Community of Practice

- The SE Exchange allows SE grantees to share resources and post questions to one another.

- Accessible from the NCSRC homepage.
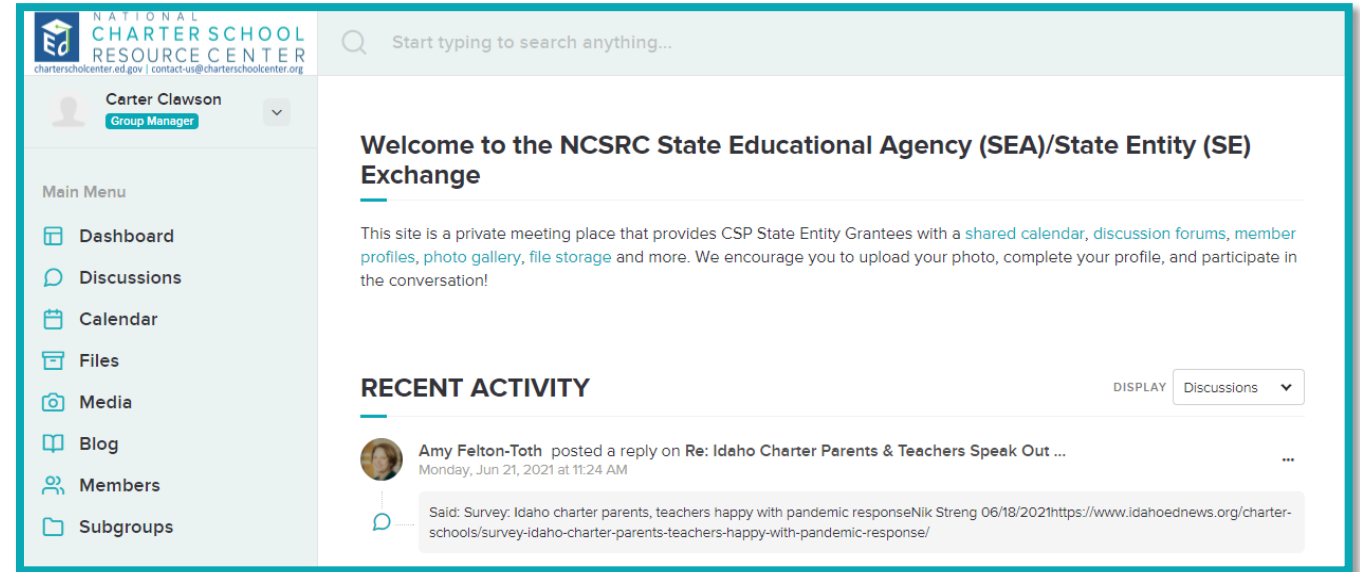
TA Resources that Are Coming Soon!

- **July 14-15:** Non-SEA SE Grant Symposium *(recordings available now!)*
  - Focused on internal controls, subgrantee monitoring, and peer review

- **August 25 and September 1 (2:00 – 3:30 ET):** SEA SE Grant Symposium
  - Focused on subgrantee monitoring and peer review

- **Resource:** CSP SE Grant Kickoff Guidebook
  - Some chapters will be useful for existing grantees

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Proposed Future TA – Give Us Your Feedback!

- **CSP SE Grant Implementation Guidebooks:** Ongoing activities and common challenges related to ongoing SE grant implementation.

- **CSP SE Grant Implementation Learning Modules:** Asynchronous webinars related to each chapter of the above guidebook created to explore essential practices for success and common grantee challenges; includes CSP, NCSRC, and monitor office hours.

Proposed Future TA - Give Us Your Feedback!

- **FAQ on How to Modify a CSP Grant**: NCE, amendments, waivers, and modifications.

- **Webinar and/or Tip Sheet on Tracking and Reporting Progress:** Data collection best practices, challenges, and tips for completing an APR & FPR.

- **Monitoring Guidebooks** (by monitor): Indicators and processes to minimize risk; *accompanied by an annual webinar on preparing for monitoring.*

- **Annual Webinars on Monitoring Findings:** High-impact monitoring findings from previous year and existing TA resources.

What are my key takeaways from this webinar?

Key Takeaways

Don't go it alone.

Get familiar with your grant application and requirements.

Codify grant project changes and get CSP approval.

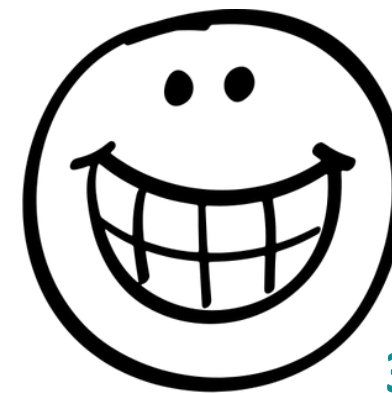Ask questions. Help is available.

Be prepared.

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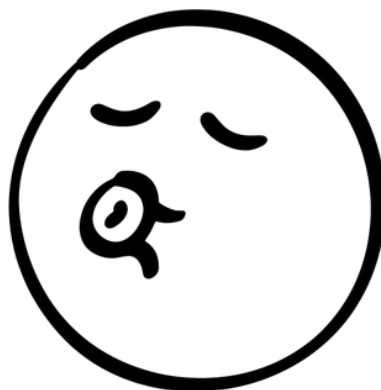
How are you feeling NOW about monitoring?

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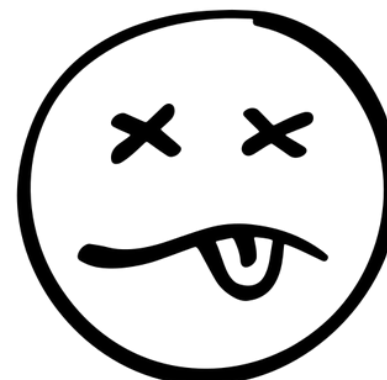
How did we do?

How can you contact NCSRC?

charterschoolcenter.ed.gov

contact-us@charterschoolcenter.org

Office Hours

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

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THANK YOU!