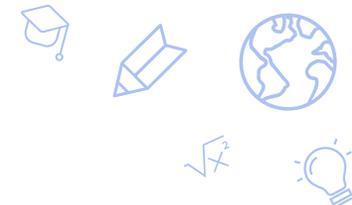




SPCSA Grant Monitoring

December 3, 2021





Purpose

- Understand the SPCSA's responsibilities regarding grants administration
- Understand the SPCSA's approach to grant monitoring
- Understand how grants and grants administration connect to other agency work

Background





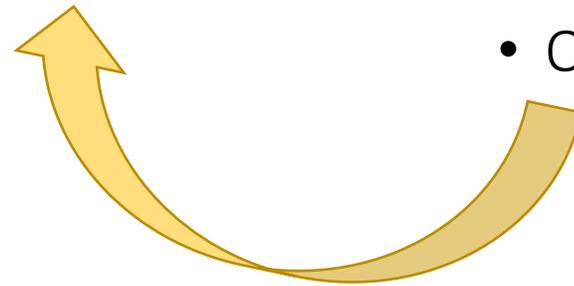
Types of Oversight

Authorizing Oversight

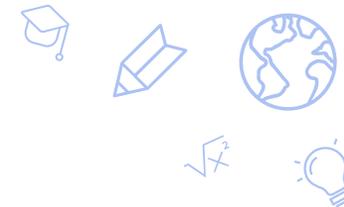
- Review of compliance and reports required by state and federal statutes
- Monitoring of academic, financial, and organizational performance
- Site evaluations

Federal and State Program Oversight

- Review of compliance with federal and state program and grant requirements
- Monitoring of effective use of grant funding and program implementation
- On-site grant monitoring

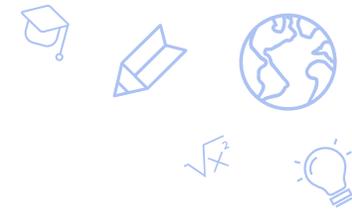


Federal and state program compliance is a component of the organizational performance framework



Grants Administered by the SPCSA

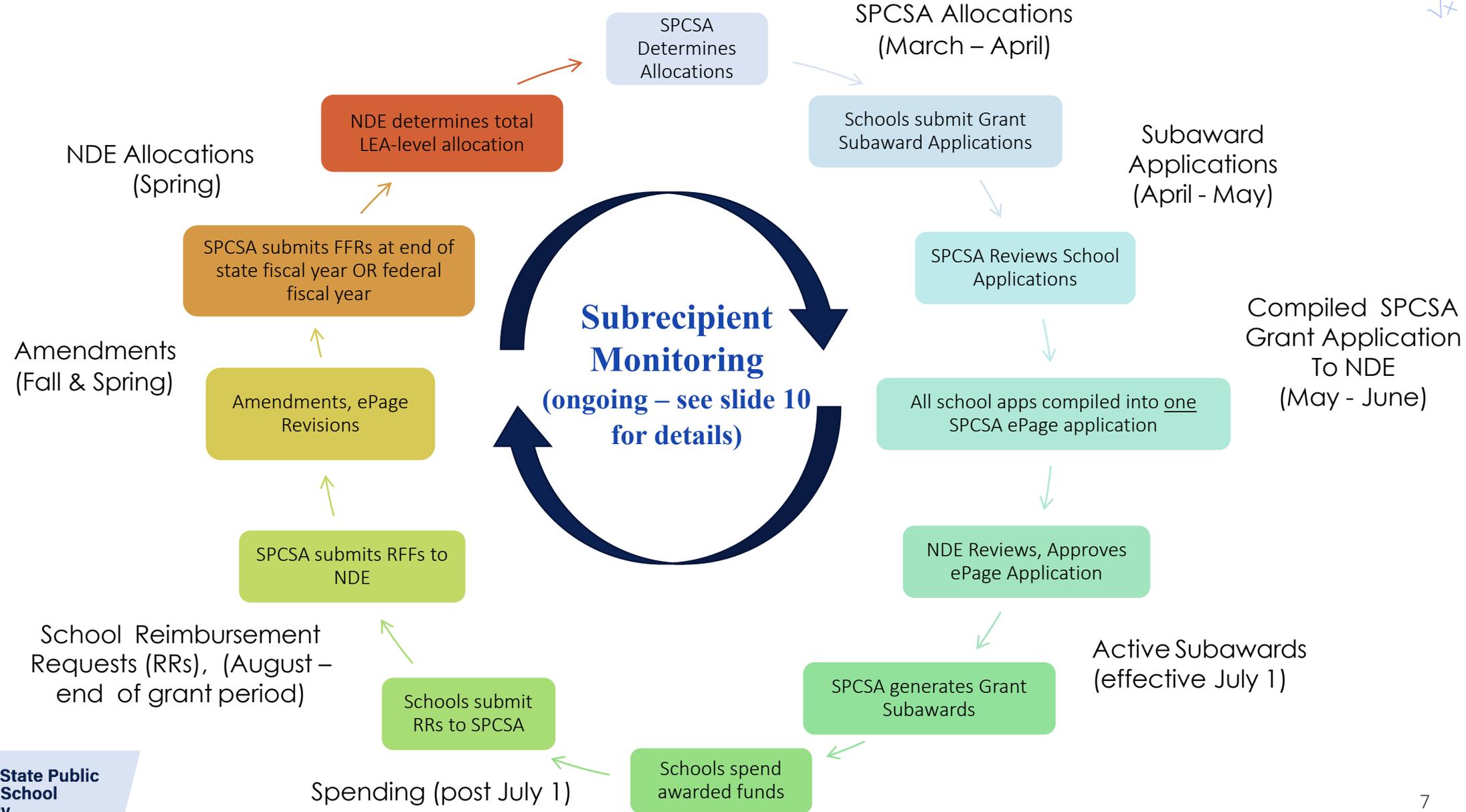
1. **Title I, Part A** improving academic achievement of economically disadvantaged students
2. **Title I, Part A , Section 1003(a)** funding for schools implementing comprehensive support and improvement activities or targeted support and improvement activities
3. **Title II, Part A** preparing, training, and recruiting high-quality teachers, principals, or other school leaders
4. **Title III , Part A ELL** increasing student English language proficiency
5. **Title IV, Part A** improving student support and academic enrichment
6. **IDEA, Part B** funding the excess costs of providing special education and related services to children with disabilities
7. **IDEA, Part B, Section 619** funding to make available special education and related services for children with disabilities aged 3 through 5
8. **ARP IDEA** supplemental IDEA Part B funding to help recover from the impact of the coronavirus pandemic
9. **ESSER (I, II, and ARP)** funding to address the impact of the COVID-19 pandemic on schools
10. **GEER** funding awarded grants to Governors for providing education-related entities emergency support as a result of the COVID-19 pandemic
11. **State Pre-K** state funding awarded to support prekindergarten programs



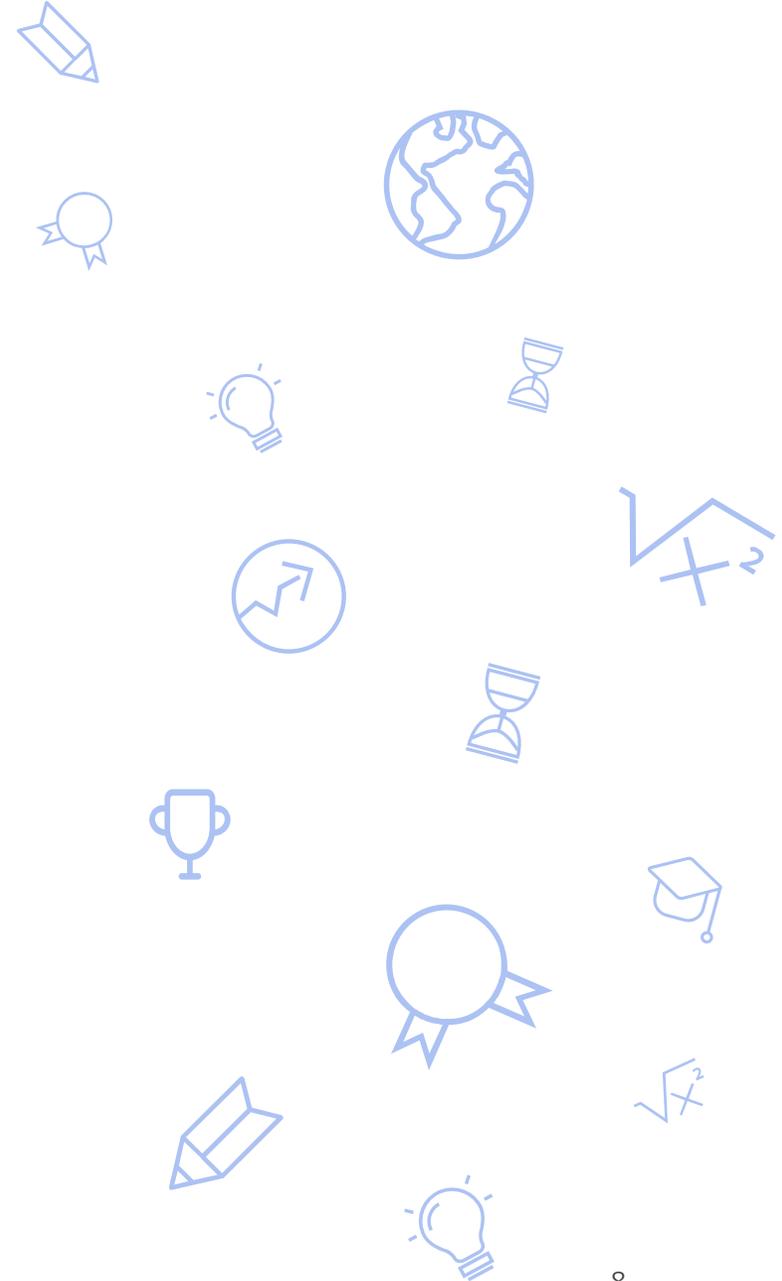
Responsibilities

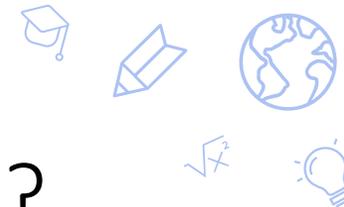
- Pursuant to 2 CFR § 200.332, as the LEA and pass-through entity for our charter schools, SPCSA responsibilities include:
 - **Ensuring grant subawards are clearly identified** for our schools
 - **Evaluating the risk of noncompliance** of each of our schools under federal statutes, rules, and regulations and subaward terms and conditions
 - **Monitoring our schools** to ensure grants used as authorized, are in compliance with federal statutes, regulations, and subaward terms and conditions, and that performance goals are achieved
 - **Ensuring our schools are audited** as may be required
 - **Taking enforcement action** when necessary to help our schools comply with federal statutes, regulations, and subaward terms and conditions

Annual Grant Cycle

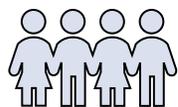


Risk-Based Monitoring





Why do we monitor how our schools use their grants?



Student Services & Well-Being

- ✓ Advance equity
- ✓ Propel programmatic innovation
- ✓ Support educator development
- ✓ Improve student outcomes



Sound Financial Stewardship

Federal grant funds are available because of taxpayers.

As public charter schools, our schools use taxpayer dollars to educate their students.

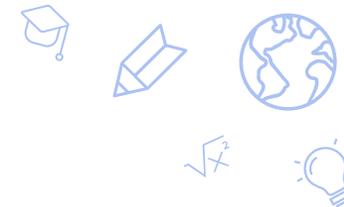
To be faithful stewards of federal funds, our schools have an obligation to comply with requirements tied to those funds.



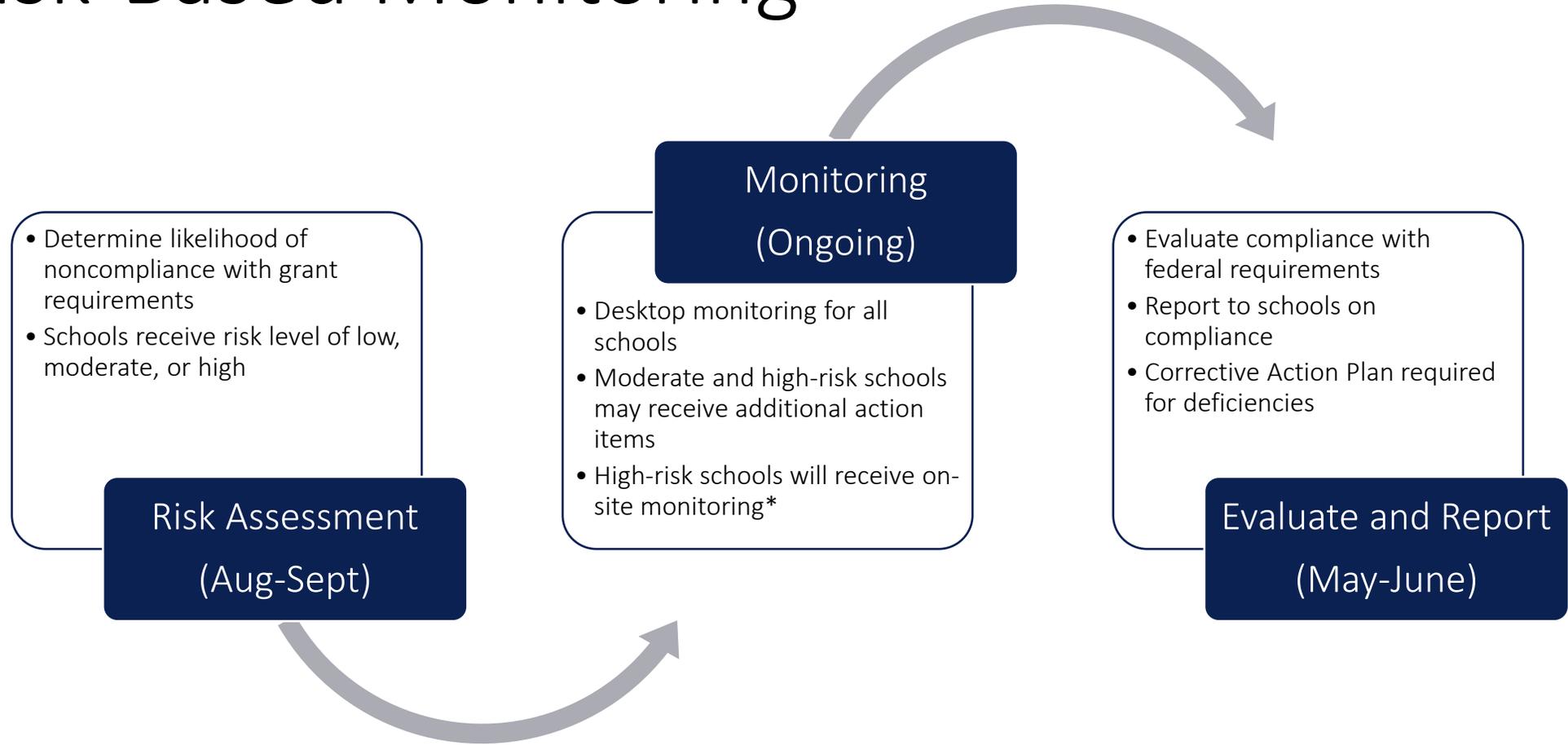
Legal Compliance

Federal grant compliance amounts to legal compliance.

As public charter schools, our schools have an obligation to comply with local, state, and federal requirements.



Risk-Based Monitoring



**All schools will receive on-site monitoring at least every 3 years so each year some low and moderate-risk schools are randomly selected for on-site monitoring*



Risk Assessment Indicators

Indicators used for FY22

- New or recently opened school
- Under Corrective Action Plan
- Single audit findings
- Quality of grant reporting
- Timeliness of grant reporting
- Turnover in key grant personnel
- TSI/CSI school status
- Number of grants administered
- Special education compliance
- Growth in populations served by grants (EL, FRL, IEP)

Additional Indicators for FY23

- Performance against grant goals
- Ability to spend down grant funds within the grant period
- Participation in required trainings
- Fiscal grant management systems and policies



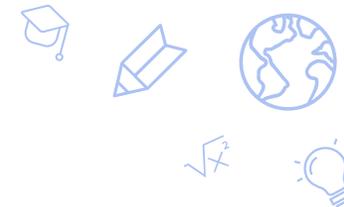
Monitoring Activities

Desktop Examples

- Reimbursement requests (Fiscal)
- School Performance Plans (Title I)
- English Learner Policy and English Learner Plan (Title III)
- Special Education Local Plans (IDEA)

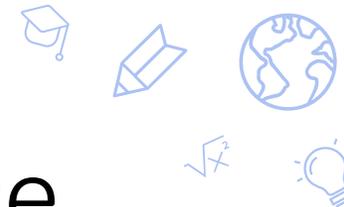
On-Site Examples

- Interviews with school staff to understand school policies and protocols
 - Family engagement (Title I)
 - Allowability of costs (Fiscal)
- Observations
 - EL supports (Title III)
 - Accounting systems (Fiscal)
- Document reviews
 - IEPs (IDEA)
 - Inventory documents (Fiscal)



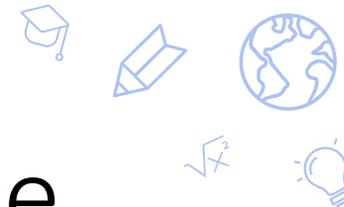
Monitoring Outcomes

- Feedback on specific desktop submissions (ongoing)
- Report regarding on-site monitoring
- Action Items/Technical Support in response to monitoring
- Corrective Action Plan to address compliance deficiencies



Relationship to Organizational Performance

Measure 2d (5 pts)	
Is the school meeting grant subrecipient compliance requirements?	
<input type="checkbox"/> MS <input type="checkbox"/> DNMS Explanation (for DNMS):	
<p>Meets Standard: The school materially complies with applicable laws, rules, regulations, and terms and conditions of all applicable subaward agreements; submits timely applications, reimbursement requests, and required reports; ensures completion of an annual single audit if required; and complies with the risk assessment and subrecipient monitoring process.</p> <p>Does Not Meet Standard The school has failed to materially comply in the manner described above.</p>	
Description <i>(For full points, the school must be in compliance with all laws, regulations, ordinances and contractual conditions including the following.)</i>	Data Source <i>(Epicenter file used unless source is "School" or SPCSA)</i>
1. The charter school complied with SPCSA published deadlines ⁴ and requirements, applicable laws, regulations and subaward terms and conditions.	<ul style="list-style-type: none"> Grant applications, reimbursement requests, time and effort reporting
2. The charter school complied with SPCSA Risk-Based Subrecipient Monitoring requirements.	<ul style="list-style-type: none"> Fiscal and programmatic instruments, onsite monitoring, desktop monitoring, responses to Corrective Action Plans or Management Decisions



Relationship to Organizational Performance

Measure 1c (5 pts)	
Is the school protecting the rights of students with disabilities?	
<input type="checkbox"/> MS <input type="checkbox"/> DNMS Explanation (for DNMS):	
<p>Meets Standard:</p> <p>Consistent with the school's status and responsibilities as a public school within the SPCSA Local Education Agency (LEA), the school materially complies with applicable laws, rules, regulations, and provisions of the charter contract (including the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act) relating to the treatment of students with identified disabilities and those suspected of having a disability, including but not limited to:</p> <ul style="list-style-type: none"> • Equitable access and opportunity to enroll • Identification and referral • Appropriate development and implementation of Individualized Education Plans and Section 504 plans • Operational compliance, including provision of services in the least restrictive environment and appropriate inclusion in the school's academic program, assessments, and extracurricular activities. • Discipline, including due process protections, manifestation determinations, and behavioral intervention plans. • Access to the school's facility and program to students in a lawful manner and consistent with students' IEPs or Section 504 plans. 	
<p>Does Not Meet Standard</p> <p>The school has failed to materially comply in the manner described above.</p>	
<p>Description (For full points, the school must be in compliance with all laws, regulations, ordinances and contractual conditions including the following.)</p>	<p>Data Source (Epicenter file used unless source is "School" or SPCSA)</p>
1. The school conducted required disability screenings on all new identified special education students within required deadlines, to the extent reasonably possible.	<ul style="list-style-type: none"> • Self-certification and no verified adverse complaints
2. The school uses Staff (internal or contracted) who hold Nevada licensure in special education, to the extent possible, over and above any requirements of law, regulation, or contract to provide special education services.	<ul style="list-style-type: none"> • Self-certification • NDE certifications database (SPCSA)
3. Evaluations and current, signed IEPs are on file for all special education students when available. 34 CFR 300.341-350 and 300.531-536 and NAC 388 https://www.leg.state.nv.us/nac/nac-388.html	<ul style="list-style-type: none"> • Self-certification, site visits, and NDE SPED Audits (SPCSA)
4. The charter school has a current special education policy that has been approved by the governing body.	<ul style="list-style-type: none"> • Board minutes showing specific date of meeting board adopted item (School)

Thank you!

charterschools.nv.gov

