



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



August 10, 2016

Patti Oya
Nevada Department of Education
700 E Fifth St
Carson City, NV 89701-5096

Dear Patti Oya:

On May 2-6, 2016, a team from the U.S. Department of Education (ED) (the Department) conducted an onsite monitoring of the Nevada Department of Education's (NDE) implementation of its approved Preschool Development Grant (PDG). This monitoring aims to continue the collaborative relationship that began at the grant award and development of the scope of work. It provides the Department with a deeper understanding of each State's overall performance; the successes, challenges, and strategies for the implementation of its plans for its PDG Development grant; and the fiscal management of the grant funds. It also helps us tailor technical assistance to each State's specific needs.

The site visit included presentations and discussions related to all projects in the approved scope of work, including grants management, high-quality preschool programs (including both new programs and programs enhanced with PDG funds), early learning standards, comprehensive services, workforce development, and sustainability. During the visit, ED project officers visited the Nevada Department of Education and several Preschool classrooms located in two high-need communities: Clark County School District, and Nye County School District.

Enclosed is a summary report based upon this review. The report includes highlights of Nevada's implementation of PDG and a snapshot of Nevada's progress under each PDG key area. This report will be posted on the PDG website. The report includes "next steps" to ensure that Nevada implements PDG consistent with its approved application, scope of work, and timelines identified in its project plans.

We want to thank you and your staff for your cooperation and hospitality during the site visit, and for your efforts in providing high quality preschool opportunities through the Preschool Development Grant. As we have discussed and as detailed further in this report, Nevada is receiving a corrective action report as a result of the visit. As such, a written response to the corrective action is expected by September 16, 2016. We hope you will continue to communicate any needs or concerns to your ED project officer(s).

We look forward to continuing our work with you and supporting Nevada's technical assistance needs to ensure successful implementation of PDG. Thank you for your commitment to Nevada's youngest children.



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



Sincerely,

/s/

Libby Doggett
Deputy Assistant Secretary
Office of Early Learning
Office of Elementary and Secondary Education
U.S. Department of Education

/s/

Linda K. Smith
Deputy Assistant Secretary for Early
Childhood Development
Administration for Children and
Families
U.S. Department of Health and Human Services

Enclosure



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



PDG Site Visit Report

Monitoring Information	
State Lead Agency	Nevada Department of Education
State Participating Agency(s)	Nevada Department of Education
Grant Period	January 1, 2015-December 31, 2019
Current Year of Grant	January 1, 2016-December 31, 2016
PDG Monitoring Period	May 2016 – September 30, 2016
PDG Monitoring Activity (Desk or Onsite)	Onsite
Monitoring Review Date(s)	May 2, 2016-May 6, 2016
State Participants/Project Leads	Patti Oya, Stacey Joyner, Teresa Cosgrove, Nikki Goldstein, Dori Chelini, Brian Turner, Andrea McCulla, Kathleen Burton, Liza Paulino, Brett Barley.
U.S. Department of Education Project Officer(s)	Shevine G. Holeman and Tammy Proctor

Overview of PDG Monitoring



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



The Department of Education is committed to supporting States as they implement the expansion of high-quality preschool programs for eligible children through their PDG grant. Consistent with this commitment, the Department has designed a monitoring process to assess a State's implementation of the program requirements and its approved Scope of Work for PDG and the State-level systems and processes needed to support implementation.

During the recent onsite monitoring, Nevada's implementation of PDG was reviewed across several key areas which represent the core priorities for implementation as outlined in the PDG Monitoring Tool: Capacity Building and Increasing Slots, Subrecipient Monitoring, Birth to Third Grade Continuum, Budget and Sustainability, and Fiscal Accountability. In each area, the Department identified key elements that are required under PDG and are likely to increase the access to and quality of State Preschool programs and lead to increased high quality opportunities for young children and their families.

Nevada was identified for a site visit based on the following factors:

- Nevada is a PDG Development State and the Department is conducting onsite visits of all PDG Development grantees;
- Nevada's has had challenges fully implementing new high-quality preschool programs;
- Nevada has a low rate of expenditures and slow drawdowns; and
- Nevada's subrecipient monitoring protocol lacked a comprehensive approach and schedule to ensure high-quality preschool programs.

The report contains the following sections:

- **Summary of Visit.** This section describes, in brief, the topics covered, the lead agency and subrecipients visited, as well as personnel participation in any meetings or activities.
- **Highlights of the State's Implementation.** This section identifies key accomplishments in the State's implementation of PDG as identified during the site visit.
- **Status of Implementation of PDG.** This section indicates the State's implementation progress based on the monitoring and information collected.
- **Elements Requiring Next Steps.** This section identifies any elements for which the State is not on target for meeting its timelines outlined in the approved scope of work and includes next steps that the State must take to meet the grant outcomes, as identified during the monitoring.
- **Recommendations to Strengthen Implementation.** This section provides recommendations to support the State in continuing to meet the goals and timelines of its PDG grant, as identified during the monitoring.
- **Additional Comment.** As appropriate, this section includes any additional information related to the State's implementation of PDG not included elsewhere.



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



Summary of Visit

The PDG onsite monitoring visit for Nevada was conducted during the week of May 2-6, 2016. During the first day of the visit, ED project officers discussed a variety of topics with the NDE pertaining to PDG implementation including the State's cash management system (EPage), monitoring protocol, birth to third grade continuum, fiscal drawdown concerns, outreach activities, teacher recruitment and the State's capacity to create new preschool slots.

The second day of the visit, ED and NDE PDG officials traveled to Nye County to visit two PDG sites located in elementary schools. Hafen Elementary included 1 classroom serving 20 children in inclusive preschool settings. Floyd Elementary provided 3 classrooms serving 60 children. The third classroom at Floyd will be moved to Hafen in the 2016-2017 school year, so that each site has two classrooms. ED and NDE met with the local PDG officials in Nye County to discuss PDG implementation challenges and noteworthy activities. ED officials noted that the PDG personnel who have opened classrooms in this county are dedicated to providing high-quality preschool programs for eligible children and that the program met most of the criteria of high quality as set forth in the PDG notice inviting applications. One noteworthy challenge discussed was the teacher qualification issue in Nye County. The teacher shortage issue impacts high-quality preschool programs throughout the entire county.

The final day of the visit, ED and NDE officials visited two PDG-funded sites located in Clark County. One preschool program was located in a Public Charter School and one program was in the Acelero Head Start Program administered by the United Way. During the visit to Clark County, ED officials discussed the PDG implementation with local PDG officials and building administrators. During the afternoon, ED staff met with NDE officials to discuss preliminary observations from the visit. Additionally, ED discussed possible options to the challenges that NDE has faced securing Clark County School District (CCSD) as a subgrantee (as a high needs community). Possible options were extensively discussed during the interview including negotiation with CCSD officials and possible outreach to other counties with High Needs Communities who expressed an interest in the PDG program. During the visit, NDE openly identified some challenges and barriers to PDG implementation including teacher shortage, space for classrooms, challenges with leveraging different sources of Federal funds, and difficulty modifying classrooms to meet program requirements.

Highlights of the State's PDG Implementation

- NDE provided ED officials with a demonstration of its E-Page (NDE's electronic plan, application, and grant expenditure system). E-Page provides access to subgrantee plans, cash management information, and reporting. This system helps to promote fiscal accountability, and effective internal controls.



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



- Quality Rating Improvement System (QRIS) program is inclusive of the K-5 elementary program. The Nevada QRIS District Model Pilot allows the NDE to gather information about how various aspects of the program is working including the Quality Improvement Plan (QIP), coaching process, and assessments to improve implementation of this system.

Status of Implementation of PDG

In the onsite monitoring, the Department used a monitoring and accountability rubric to help determine progress of the State’s implementation. The rubric includes three implementation status levels:

- **Level 1 – Developing:** the State is in the process of developing this activity, or the activity is very new. The State may be facing challenges in implementation, roll-out, or communications with subrecipients and other stakeholders.
- **Level 2 – Implementing:** the State has developed and implemented the activity, although the activity might still benefit from adjustments, training, or communications with subrecipients and other stakeholders.
- **Level 3 – Sustaining & Continuing Improvement:** the activity is well-established in the State, and may be undergoing a process of evaluation or program improvement. Subrecipients, stakeholders and users have been trained and/or communications strategies have been established.

Element	Status
Capacity Building and Increasing Slots	
The State public awareness and recruitment activities are targeted towards eligible 4 year old children in high need communities and families 200 percent below poverty.	Level 2-Implementing
The State’s expansion efforts are targeted towards increasing the access to high quality preschool programs for 4 year olds.	Level 1-Developing
The State has a plan to ensure that existing State Preschool slots met the twelve standards of a High Quality Preschool Program under the PDG funding.	Level 2-Implementing



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



Subrecipient Monitoring	
The State Lead Agency has a process to monitor grant and sub-recipients activities to ensure implementation of the goals and performance measures outlined in the approved PDG State Plan.	Level 1-Developing
The State is on schedule with its monitoring of subrecipients to ensure that all of the high quality standards for Preschool are met within PDG funded preschool classrooms.	Level 1-Developing
The State is providing access to comprehensive services to all children enrolled in the PDG funded preschool classrooms.	Level 2-Implementing
Birth to Third Grade Continuum	
The State has aligned the PDG funded program within the Birth to Third Grade Continuum of early learning standards and activities that help prepare children for kindergarten thru third grade.	Level 2-Implementing
The State is implementing a data collection system for tracking student outcomes from prekindergarten to kindergarten entry through third grade.	Level 2-Implementing
The State is implementing a transition protocol to ensure that children transitioning from early care and education environments to kindergarten to third grade settings receive the supports necessary for a smooth transition.	Level 1-Developing
Budget and Sustainability	
The State has policies and procedures to track the State and Subrecipient budget activities to ensure that funds are expended according to State, Local and Federal procurement laws.	Level 2-Implementing
The State has in place a system to track the “use of funds” under the PDG grant.	Level 2-Implementing



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



The State has a plan to ensure that High Quality State Preschool Programs will remain of high quality after federal funds are no longer available.	Level 1-Developing
Fiscal Accountability	
The State has policies and procedures in place to ensure the grant funds are expended according to the federal laws outlined in the federal Super Circular and EDGAR.	Level 2-Implementing
The State has a system in place to ensure that its Subrecipients are meeting the federal laws of the Super Circular and comply with the “supplement not supplant” requirements.	Level 2-Implementing

Elements Requiring Next Steps:

Through its onsite monitoring, annual performance reporting and continuous monthly calls over the past months, the Department has noted its concern about NDE’s implementation of its PDG grant. The areas of concern are: State capacity and ability to increase the number of high-quality preschool slots; sub-recipient monitoring; and fiscal accountability. As a result of its program review and ongoing monthly calls, the Department is imposing a Corrective Action Plan (CAP) targeted on the following areas:

1. NDE must increase the number of eligible children enrolled in high-quality preschool programs under this grant. As approximately half of Nevada’s low income residents live within CCSD, the Department encourages NDE to make arrangements to work with CCSD to provide high-quality preschool program slots to eligible children, as it committed to in its approved application. If Nevada is not able to make arrangements with CCSD for it to provide preschool programs under this grant, the State must find other methods of outreach/recruitment and/or secure new subrecipients to help meet its program goals.
2. NDE’s current MOUs with subgrantees must be revised to include critical contractual terms of agreement for PDG implementation. Without this language, expectations between NDE and its subrecipients are not clear. At this time, MOUs include “boilerplate” language without specifying how high-quality preschool programs will be delivered to eligible children (e.g. students served, funding per students, etc.).



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



3. NDE must immediately and effectively implement a sub-recipient monitoring plan to ensure program compliance in areas such as teacher requirements, number of instructional hours, inclusion of students with disabilities, and other areas of non-compliance identified through its Subrecipient Monitoring Plan. The Department encourages NDE to establish a “risk factor” approach to use with its subgrantees with critical compliance issues.
4. NDE must ensure that PDG funds are spent in a timely and compliant manner. Due to NDE’s history of slow fiscal “draw downs”, program and fiscal staff at both the state and district level should work closely together to ensure effective spending of PDG funds in a timely manner.
5. NDE must ensure that every PDG-funded preschool classroom has at least one teacher with a Bachelor’s degree, as required by the grant. The Department encourages NDE to establish partnerships with the local NDE office of teacher licensure in order to identify potential candidates for preschool teacher positions to address the shortage of teachers with bachelor’s degrees.

NDE must submit a comprehensive plan to address the issues identified in the Corrective Action Plan (CAP) within 30 days of receiving the Corrective Action Plan and monitoring report



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



Corrective Action Plan (CAP) Template

This Corrective Action Plan (CAP) template is a tool to help staff address the grant requirements in the PDG grant while working together to create meaningful, practical, and supportive CAPs. It uses the steps and tracking below.

Step I. Areas Identified for Improvement (*examples*)

- **BA Degree Teachers**
- **Full Day Preschool Program**
- **Comparable Teacher Salary**

Step II. Goals and Professional Responsibilities

- **Goals and responsibilities to be developed for each area of deficiency**
- **Team has 30 days to submit CAP**

Step III. CAP Progress Summary

- **Request a quarterly report in writing on the progress of the CAP with sub reports on targeted tasks monthly in advance of each monthly call with Program Officer**

Interim Review of CAP Progress

- ***6 month review by Project Officer from date of signed CAP***

Summative Review of CAP Progress

- ***12 month review by Project Officer from date of signed CAP***



Corrective Action Plan (CAP) Template

State Name:	State Agency on Grant:	Date
Nevada	Nevada Department of Education	August 3, 2016
Project Officer Name :	Date of Monitoring Visit:	Plan Begin/End Dates
Shevine Holeman	May 2-6, 2016	August 10, 2016

I. Areas Identified for Improvement

No.	Areas Identified for Improvement	Sources of Information/Evidence	Corresponding Component (if applicable)
1	Building capacity and slots	Documentation showing capacity reached (and recruitment efforts) with eligible preschool children being served in a high quality preschool program	
2	Sub-recipient monitoring	Evidence of subrecipient monitoring including schedules, protocols (with high quality elements), reports , corrective action , and follow-up elements	
3	Fiscal accountability and timely drawdowns	Timely and compliant drawdowns as demonstrated in the G5 and GRADS	
4	Teacher qualifications	Documentation including evidence of bachelor level degree of PDG teachers	
5	MOU revisions	Revised MOUs to include critical information (e.g. students served etc.)	

II. Goals and Professional Responsibilities

Area No.	Demonstrable Goals	Staff Member Responsibilities	Supervisor Responsibilities	Completion Date	Estimated Hours
1					
2					



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



3					

Area No.	Demonstrable Goals	Staff Member Responsibilities	Supervisor Responsibilities	Completion Date	Estimated Hours
4					
5					

My signature below indicates that the leadership team and I have received a copy of this Corrective Action Plan and that I understand and contributed to its contents.

Lead Agency Signature: _____ Date: _____

Leadership Team Member Signature: _____ Date: _____

Leadership Team Member Signature: _____ Date: _____

Leadership Team Member Signature: _____ Date: _____



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



III. CAP Progress Summary

Interim Review of CAP Progress

Area No.	Demonstrated Progress	Sources of Evidence	CAP Revisions (if applicable)	Review Date
1				
2				
3				

My signature below indicates that the leadership team and I have reviewed the information recorded in the Interim Review of CAP Progress and that I understand its contents:

Lead Agency Signature: _____

Date: _____

Leadership Team Member Signature: _____

Date: _____

Leadership Team Member Signature: _____

Date: _____

Leadership Team Member Signature: _____

Date: _____



UNITED STATES DEPARTMENT OF EDUCATION
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES



Summative Review of CAP Progress

Area No.	Demonstrable Goals	Expectations Met (Y) or Not Met (N)	Sources of Evidence
1			
2			
3			

My signature below indicates that the leadership team and I have reviewed the information recorded in the Summative Review of CAP Progress and that I understand its contents:

Lead Agency Signature: _____ Date: _____

Leadership Team Member Signature: _____ Date: _____

Leadership Team Member Signature: _____ Date: _____

Leadership Team Member Signature: _____ Date: _____

