

Accountability and Oversight

RACE TO THE TOP FISCAL ACCOUNTABILITY AND OVERSIGHT REVIEW

District of Columbia

Date of Review: May 6-9, 2013

Race to the Top award: \$74,998,962

Acronyms:

ARRA – American Recovery and Reinvestment Act of 2009

EDGAR – *Education Department General Administrative Regulations* (codified in 34 Code of Federal Regulations, Parts 74 to 86 and 87 to 99)

GEPA – General Education Provisions Act

ISU – Implementation and Support Unit

LEA – Local Educational Agency

OSSE – Office of the State Superintendent of Education

Summary of Monitoring Indicators

District of Columbia				
Critical Element	Requirement	Citation	Results	Page
Allocations to LEAs	The State allocated funds to participating LEAs based on their relative share of funding under Title I, Part A of the Elementary and Secondary Education Act of 1965.	ARRA Section 14003(a)	Met Requirement	
Fiscal Oversight of Race to the Top Funds	The State and sub-recipients used the funds only for allowable activities.	ARRA Sections 14002(b), 14003, 14004, 1604, 1605, and 1606	Met Requirement	
	The State and sub-recipients complied with the principles of cash management (i.e. funds advanced were actually expended).	EDGAR § 80.21	Met Requirement	
	The State and sub-recipients have systems to track and account for Race to the Top funds in place.	EDGAR § 80.20	Issue Resolved	4
	The State and sub-recipients complied with cross-cutting ARRA requirements (e.g., Section 1512 reporting, Buy American, infrastructure certification).	ARRA Sections 1511, 1512, 1604, 1605, 1606, and 1607	Met Requirement	
	The State and sub-recipients used the funds only during the period of availability (which may include pre-award costs).	ARRA Section 1603 and GEPA 421(b)	Met Requirement	
1511 Certifications (if applicable)	The State certifies that infrastructure investments have received the full review and vetting required by law and accepts responsibility that it is an appropriate use of taxpayer dollars.	ARRA Section 1511	Not Applicable	
Quarterly ARRA Reporting	The State is ensuring compliance with ARRA Section 1512 quarterly reporting regulations.	ARRA Section 1512	Met Requirement	
	The State established clear policies and procedures for compliance with applicable reporting requirements.	ARRA Sections 14008 and 1512	Met Requirement	
	The State provided guidance on reporting to LEAs.	ARRA Sections 14008 and 1512	Met Requirement	
	The State provided feedback to LEAs on the data reported.	ARRA Sections 14008 and 1512	Met Requirement	

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Critical Element	Requirement	Citation	Results	Page
Sub-recipient Monitoring	The State has developed a monitoring plan with appropriate policies and procedures to assure compliance with applicable Federal requirements and that the grant performance goals are being achieved throughout the project period.	EDGAR §80.40; Race to the Top grant condition "O"	Met Requirement	
	The State has developed comprehensive monitoring protocols that include programmatic and fiscal monitoring.	EDGAR §80.40; Race to the Top grant condition "O"	Met Requirement	
	The State has established a reasonable monitoring schedule.	EDGAR §80.40; Race to the Top grant condition "O"	Met Requirement	
	The State has provided monitoring reports and corrective action follow-up (when available).	EDGAR §80.40; Race to the Top grant condition "O"	Met Requirement	

Monitoring Report Results

Issue Resolved

Critical Element: Fiscal Oversight of Race to the Top Funds

Requirement and Citation: The State and its sub-recipients must have systems to separately track and account for Race to the Top funds; EDGAR § 80.20

Issue: During the Year 2 onsite review, the Department identified an LEA that failed to demonstrate that it was separately tracking funds for Race to the Top. Based on the fiscal documentation provided during the Year 3 onsite visit, the LEA provided documentation demonstrating that it was now tracking Race to the Top funds separately. During the Year 3 onsite review, the Department identified another LEA that was unable to demonstrate that it separately tracked its Race to the Top funds.

OSSE has a reimbursement request and review process in place for the Race to the Top reimbursement requests from sub-grantees. To ensure that the reimbursement requests are for allowable expenditures, OSSE compares the expenditures to the sub-grantee's approved Scope of Work. Thus, we are requiring corrective action by OSSE to help ensure that all LEAs receiving Race to the Top program funds are aware of the requirement that they separately track those funds.

Resolution: Subsequent to the review, OSSE submitted to the Department evidence that it has informed all sub-recipients of the requirement to separately track Race to the Top funds per a memo on October 28, 2013 sent to all Race to the Top participating LEAs.

In November 2013, OSSE also provided documentation to the Department that the LEA that was not able to provide evidence that it separately tracks Race to the Top funds is now in compliance per the LEA's board meeting agenda and minutes and revised chart of accounts with a separate code for Race to the Top funds. The Department will follow up on the implementation of systems to separately track and account for Race to the Top funds during the Year 4 program review.