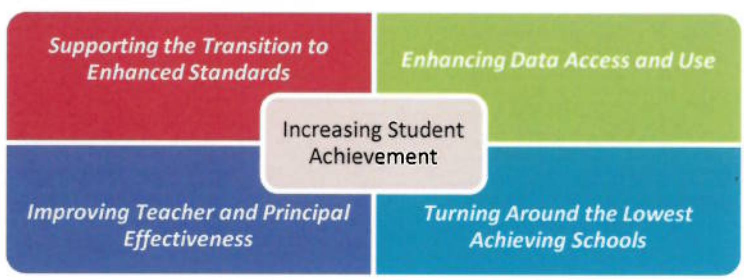
Office of the
State Superintendent of Education

District of Columbia
Race to the Top
Monitoring Plan



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Race to the Top Monitoring Policy

PURPOSE

This document delineates the minimum requirements and standards the Race to the Team (RTTT) team shall use to monitor programs implemented by grant subgrantees. Race to the Top (RTTT) monitoring will include program compliance and implementation quality measures.

The RTTT team shall use this policy as a guide in developing individual program specific monitoring protocols and tools which address the requirements of both formula and competitive funds awarded through the grant. The RTTT monitoring policy includes guidelines delineated in the OSSE monitoring policy and the City-Wide Grants Manual and Sourcebook.

SCOPE

This policy applies to all RTTT grants administered by OSSE. This includes the formula funds and the competitive grant funds awarded to RTTT participating local education agencies (LEAs).

Formula funds have been awarded to assist LEAs in completing these activities in the following categories:

- Supporting the Transition to Enhanced Standards and Assessments
- Using Data Systems to Support Instruction
- Improving Teacher and Principal Effectiveness
- Turning Around the Lowest Achieving Schools.

The participating LEAs signed memoranda of understanding (MOU) that outlines their responsibilities under this grant. The MOU will serve as a basis for monitoring.

Competitive grants funded and administered by the Subgrantee team will also be monitored under this policy. These funds will be provided to enhance the ability of participating LEAs to:

- Recruit, train and support new teachers through residency programs
- Build professional learning communities
- Develop instructional improvement systems
- Expand student growth coverage to non-tested grades
- Turn around the lowest achieving schools.

Any LEA receiving a competitive award must have completed a separate application for funding. The LEA application will serve as a basis for monitoring.

AUTHORITY

The Public Education Reform Amendment Act (PERAA) of 2007 established the Office of the State Superintendent of Education (OSSE) as the State Education Agency (SEA) for the District of Columbia (DC Code § 38-2601.01). As the SEA, OSSE is responsible for monitoring grant recipients to ensure compliance with local and federal laws and regulations as they relate to grants from the U.S. Department of Education. Additionally, OSSE is responsible for ensuring compliance with requirements, such as those set forth in the Title XIV of the American Recovery and Reinvestment Act of 2009 (ARRA), RTTT program.

DEFINITIONS AND PURPOSE OF MONITORING

Monitoring is the regular and systematic examination of all aspects associated with the administration and implementation of a state approved program in an effort to ensure compliance with local and federal regulations. The process also measures results and assists the SEA in determining which programs need technical assistance in an effort to ensure high quality programs in accordance with the goals and objectives of the District of Columbia Subgrantee program.

AMERICAN RECOVERY AND REINVESTMENT ACT (ARRA) REQUIREMENTS

This grant will be monitored for adherence to the approved District of Columbia application and all applicable statutes and regulations, including Title XIV of the American Recovery and Reinvestment Act (ARRA)of 2009 and the General Education Provisions Act (GEPA). The RTTT team will adhere to and expect for subgrantees to comply with the reporting deadlines as described in Section 1512 of ARRA. The ARRA data submissions will be collected in coordination with the OSSE reimbursement process that governs all funds administered by the agency.

MODES OF DELIVERY

The RTTT team will conduct monitoring activities through both **desktop** and **onsite** monitoring**.** We will also require LEAs to perform self-assessments. All subgrantees will receive at least one onsite monitoring visit during the period of the grant. In instances where subgrantees do not receive an onsite visit during the course of a particular program year, at a minimum, they will be monitored through desktop monitoring.

The onsite monitoring schedule will be prioritized by a risk-assessment criterion (described in the onsite monitoring section below). All monitoring strategies and schedules will be coordinated agency-wide to: identify cross-cutting areas of monitoring across programs; to realize synergies; to set clear expectations for subgrantees and to ease the burden on individual schools.

I. DESKTOP MONITORING

At a minimum, each LEA will receive an annual desktop monitoring. There are three main components of the OSSE's desktop monitoring process, which involves the review of documents submitted by the subgrantee: fiscal review, programmatic and self-assessment review.

1. Fiscal Review

The OSSE regularly monitors its subgrantees for compliance with federal and local guidelines as described in Education Department General Administrative Regulations (EDGAR) and the related OSSE-wide monitoring policy. It is a tiered monitoring approach that could be as specific as a request for documentation supporting a single reimbursement request or as expansive as a request for a series of quarterly reports or external audits.

Additionally, OSSE has recently established the Office of Grants Management and Compliance which is charged with addressing cross-cutting fiscal and program issues across grant programs. This office is responsible for centralizing the A-133 audit review process for subgrantees. The RTTT team will work closely with the Office of Grants Management and Compliance to ensure that all subgrantees are operating fiscally sound grant programs.

a. Payment Process for Federal Funds (Reimbursement Policy)

Since the 2008-2009 program year, OSSE has implemented new payment procedures. In accordance with section 80.21(d) of the Education Department General Administrative Regulations (EDGAR) the OSSE has implemented a cost reimbursement process for all subgrantees. As such, this layer of desktop monitoring requires that all subgrantees receive payments after they substantiate that the cost is allowable and is relevant to program expenditures as delineated within the approved Statements of Work. This reimbursement policy applies to all RTTT funds, including formula and competitive grants. This policy is provided in Appendix E.

RTTT program staff conduct a two-tiered analysis of each reimbursement request. This process is the first layer of desktop monitoring and provides the opportunity for RTTT program staff to flag discrepancies between the LEA Statement of Work and its activities.

b. Intensive Review of Financial Documents

During both onsite and desktop monitoring, the RTTT team will ensure that subgrantees are maintaining accurate, complete and reliable financial and programmatic documentation for all RTTT expenditures and track these funds separately from expenditures from all other funding sources, including other ARRA funding sources, in accordance with assurances under the RTTT application. Additionally, the RTTT team will require that subgrantees provide documentation to support a sample of expenditures claimed on reimbursement requests. The RTTT monitoring team will, at a minimum, require supporting documentation for one whole month's expenditures. In addition to the one month sample required of all subgrantees, additional sampling requests (ranging in frequency and size) may be required based on the following risks:

- High percentage of disallowed costs
- Significant increases or decreases in planned drawdown timelines
- Inordinate amount of budget revisions in excess or equal to reimbursement submissions
- Audit findings (from independent and/or A-133 audits)
- OSSE monitoring findings
- Size of award
- Request for reimbursement of goods or services not yet received
- Official Public Charter School Board (PCSB) action.

Additional requests beyond the minimal sampling stated above will be determined based upon the aforementioned risks/factors. Subgrantees who frequently submit unsatisfactory samples may be subject to repeated sampling, and in addition, be subject to returning funds to the OSSE where expenditures claims cannot be properly substantiated. Subgrantees will be required to prepare and submit their sample to the RTTT team with the pre-site monitoring documents due two weeks prior to an onsite monitoring visit.

The subgrantee must identify one main contact and one backup person to serve as the contact point for the RTTT's notice to submit sampling. Sampling materials must be submitted to the RTTT team via email to osse.RTTTmonitoring@dc.gov (or hard copy delivered via certified mail, FedEx, UPS, DHL or courier). Requests for additional information may be required and must be provided within three business days.

Types of Evidence

Items listed below represent documents that could be used to support expenditures submitted for reimbursement and that may be requested as part of the RTTT team's monitoring of its subgrantees' proper administration of federal education grant programs. The list provided below is by no means exhaustive.

- Payroll transactions
    - A list of employees paid with federal grant funds
    - Job or position descriptions
    - Time and effort records demonstrating employees worked on grant activities (e.g. semi-annual certifications, personnel activity reports)
    - Time and attendance records demonstrating when employees worked (e.g. time sheets, leave slips, etc.)
    - Evidence of payroll reconciliations
    - Accounting records indicating how salaries were charged
    - Payment records indicating how salaries were paid
- Procurement transactions
    - Requisitions
    - Cost estimates
    - Requests for bids, proposals, etc. (as required by the subgrantee's procurement procedures)
    - Copies of bids, proposals, etc. submitted
    - Evaluation documents (as required by the subgrantee's procurement procedures)
    - Purchase orders or contracts
    - Invoices
    - Proof items purchased were received
    - Inventory records
- Records showing the subgrantee is meeting its obligations under EDGAR 76.730 and/or the City-Wide Grants Manual and Sourcebook, including documents showing:
    - Separate tracking of RTTT funds
    - The amount of funds available under the grant;
    - How the grant recipient used the funds;
    - The total cost of the project;
    - The share of that total cost provided from other sources; and
    - Other records to facilitate an effective audit.

Sampling Methodology

The RTTT team will employ the use of a sampling methodology when reviewing supporting documentation as part of the monitoring process. Sampling is used to observe random subsets in order to learn about a greater population from which the subset is taken. Inferences can be made from the observed subset, with a certain level of confidence that the inferences apply to the population as whole. Sampling allows the examiner to quantify results and relate them to the entire population being reviewed, using limited resources to review large amounts of material.

As part of the sampling plan the RTTT team may:

- Conduct surveys to determine size/resource capabilities of the subgrantee;
- Request proposed timelines from subgrantees for submission of reimbursement request materials; or
- Request a list of those responsible for operations, equipment inventory, or accounting.

Financial Progress Reports for Competitive Grants

LEAs that are awarded RTTT competitive grants are also responsible for submitting either quarterly or semiannual financial reports to the OSSE, depending on the terms outlined in the GAN. These reports will be submitted in addition to the quarterly reimbursement requests and will provide the OSSE with regular updates on the use of funds and how these funds align to the deliverables described in the grant application. The OSSE will use this information to determine if technical assistance or corrective actions are needed to ensure the project's success. A sample fiscal progress report is provided in Appendix B.

Although many of the RTTT competitive grants encourage consortia of schools to apply for funding, there may only be one lead, or fiscal, agent that receives the funding and is responsible for all reporting to the OSSE. This lead is also responsible for ensuring that all federal and local regulations are met by the consortium. As a condition of a grant which includes more than one LEA, the OSSE may ask lead applicants to provide their own monitoring plan for review.

Desktop Monitoring Schedule

Desktop monitoring, inclusive of a fiscal review, will occur at least annually for all participating LEAs not scheduled for an onsite review. However, as delineated previously, each time a reimbursement request is submitted, RTTT program staff, as part of its cost reimbursement process will substantiate that all costs are allowable and relevant to program expenditures as delineated within the approved grant application and / or statement of work. In the case of a more specialized desktop review, subgrantees will be notified of the desktop monitoring at least four weeks in advance and will be informed of any pre-monitoring documentation they should prepare. The draft monitoring notification and Pre-site Document Request List can be found in Appendix A.

Desktop Monitoring Response

After the monitoring, the OSSE review team will send written correspondence to the subgrantee. The correspondence will provide an overview of any findings, recommendations and plans for onsite monitoring, if applicable. At this time, subgrantees may also be required to develop and submit a corrective action plan (CAP) at the conclusion of the desktop review. In addition, the OSSE program office will be available to provide targeted technical assistance as follow up to any desktop monitoring.

Resolution

Desktop monitoring should encourage subgrantees to evaluate the degree to which their systems for grant management are consistent and aligned with statutory and regulatory requirements in order to identify possible improvements. Additionally, desktop monitoring will be used to inform onsite monitoring. The collection of fiscal, data and programmatic indicators throughout the year will allow program monitors to determine which subgrantees are in need of closer evaluation and for what aspects. Subgrantees will be informed in advance if they have been selected for onsite monitoring as a follow up to the desk review in the written correspondence.

2) Programmatic Review

The OSSE will also monitor its subgrantees to determine the quality of the implementation of RTTT priorities. All subgrantees have agreed to develop or enhance programs to meet the programmatic goals of the District's RTTT award, and it is OSSE's role to make sure that these milestones are being met and are being implemented effectively. In addition to desktop financial monitoring, OSSE also uses desktop programmatic monitoring to help LEAs develop strong plans that they will be able to implement throughout the life of the grant.

Process

Participating LEAs have submitted plans to the OSSE that detail what they are going to do in order to meet the milestones for a number of RTTT projects including the Common Core Transition Plans and Teacher Evaluation System. These plans then undergo a blind review by a team of OSSE staff RTTT task force members. Plans that do not meet the standards outlined in the rubric will be returned to the LEA for revisions and resubmission. The plan will undergo review until it is approved and is determined to meet all of the defined criteria. These plans will then serve as the basis for programmatic monitoring. Where OSSE has not yet collected detailed project plans, it will rely upon information in the participating LEA's statement of work and the Memorandum of Understanding (MOU) for the standards upon which an LEA's progress is measured.

OSSE will also monitor LEAs for compliance with the reporting requirements in the RTTT application and for compliance with the OSSE data policy. This review will include examination of LEA data collection processes, comparison between OSSE-collected data and LEA data, and confirmation of timely data submissions.

Programmatic Progress Reports for Competitive Grants

LEAs that are awarded RTTT competitive grants are also responsible for submitting either quarterly or semiannual progress reports to the OSSE, depending on the terms outlined in the GAN. These reports will provide the OSSE with regular updates on progress towards the deliverables described in the approved grant application. The OSSE will use this information to monitor the subgrantee to ensure implementation and compliance with project plans and stated deliverables. The team will also use this information to determine if technical assistance or corrective actions are needed to ensure the project's success. Sample program progress reports are provided in Appendix C.

Many of the RTTT competitive grants encourage consortia of schools to apply for funding. These consortia must identify a lead applicant that is responsible for coordinating all programmatic reporting to the OSSE.

3) Self-Assessment

OSSE will also utilize self-assessments as part of its monitoring process. Subgrantees will complete a series of self-assessment questions within the Years 2-4 Statement of Work to document their successes and challenges with meeting performance measures within their Year 1 OSSE-approved Statements of Work and other required plans. At the conclusion of each subsequent grant year, subgrantees will be required to complete a similar reflection tool to assess and rate themselves on whether they are meeting the stated performance measures and deliverables. This tool will allow subgrantees to demonstrate performance and provide a plan of action for how they will meet any deliverables that were not met in the previous year. Subgrantees will also be required to discuss how it will incorporate lessons learned from both the successes and challenges in the upcoming years of the grant. The RTTT team will use the information gathered from these self-assessment activities to inform its targeted technical assistance program and its monitoring schedule.

II. ONSITE MONITORING

Onsite monitoring involves a comprehensive assessment of the LEA's programming. The review examines both financial and programmatic elements and is conducted by a review team from the RTTT program office at a site where a related program is operating. A monitoring team comprised of content area experts spends approximately one to two days onsite to evaluate all phases of program administration and operations using a comprehensive evaluation rubric. This rubric will guide the reviewer in evaluating the performance of the subgrantee in its compliance and its implementation quality. A draft rubric is included as Appendix D. Any subgrantee selected for onsite monitoring will be notified at least four weeks in advance and will be required to submit documentation delineated within the RTTT Pre-Site Monitoring Document Checklist at least two weeks prior to the scheduled onsite visit to osse.RTTTmonitoring@dc.gov.

Onsite Review Process

During the onsite review, the review team may perform some or all of the following tasks:

- Review selected documentation (e.g. expense reports, local applications, programs of study, curriculum plans) relevant to the grant expenditures or program;
- Review student data/student records as they relate to the program area;
- Visit classrooms or service areas of the related program;
- Conduct focus group meetings with faculty, staff, students, parents, providers or other key stakeholders participating in or affected by the program;
- Perform an exit interview with key staff to discuss preliminary findings; or
- Conduct additional monitoring activities, as needed.

Onsite Monitoring Schedule

The annual onsite monitoring calendar will be developed based upon the risk analysis described under the Risk Assessment section. Each participating LEA will receive at least one onsite monitoring visit during the period of the grant, but, depending on the risk assessment, some LEAs may be monitored with greater frequency. RTTT team will distribute the list of which subgrantees will be monitored in each year of the four year grant. Recipients of competitive grant funds will be monitored at least annually, and these will be conducted in coordination with the regular onsite monitoring visits. Draft monitoring schedule provided in Appendix F.

Coordination of Onsite Monitoring Across OSSE

During the school year 2009-10, the Division of Elementary and Secondary Education (ELSEC) under the direction of the OSSE Grant Monitoring Workgroup developed a comprehensive monitoring calendar which includes each program administered by the division. The RTTT team will include the monitoring of its program under the comprehensive monitoring calendar. Such coordination across program areas will allow for more efficient and effective cross-cutting monitoring strategies, while limiting adverse impact on program operations.

OSSE is currently in the process of drafting a procedure that will allow the results of monitoring activities to be shared across programs so that calendars and follow up activities may be coordinated in real time. Program offices will review monitoring results in conjunction with the review of independent audits and A—133 audits.

Risk Assessment

The RTTT team creates the monitoring schedule annually based upon several key factors which may include previous monitoring reviews performed by staff, review of A-133 Single Audit (if applicable) and other established risk factors. RTTT will consider at least the following risk criteria when determining the monitoring rotation and focus areas for each subgrantee monitoring effort. Subgrantees will receive a risk rating (high, medium or low risk) based upon these risk factors which will determine the level of monitoring that will be conducted. *Please note other program specific criteria may also be considered at the discretion of the respective grant manager.*

- A-133 Single Audit results
- Consistent noncompliance relative to unresolved findings identified during previous monitoring reviews
- Individual complaints to the agency
- Total amount of grant awards
- Failure to spend funds in accordance with annual budget or general failure to liquidate funds
- Late reporting (e.g. expenditures (including 1512 reporting), status reports, progress reports, equipment inventory)
- Percent of disallowed to allowed expenditures
- Excessive administrative costs
- Failure to adhere to terms and conditions set forth in the Grant Award Notice (GAN)
- Failure to make substantial progress toward grant goals and objectives (noted during data collection or self-assessment)

Onsite Monitoring Response

After the conclusion of the onsite review, the RTTT review team will send a monitoring report to the subgrantee. The report will address any findings, recommendations and corrective actions, if applicable. Subgrantees will have 30 days to develop a corrective action plan, which delineates strategies and a timeline in which they plan to correct any findings. The RTTT program office will be available to provide targeted technical assistance.

CORRECTIVE ACTION PLAN (CAP)

Subgrantees may be required to submit a corrective action plan (CAP) after desktop or onsite monitoring. The RTTT team will review a subgrantee's CAP and provide feedback within 30 business days. The program office will also work with the subgrantee to ensure the plan is sufficient, manageable and timely. Finally, the RTTT program office may conduct post-monitoring visits to ensure the plan has been sufficiently implemented.

CONDITIONS / RESTRICTIONS

A subgrantee's failure to comply with requests for monitoring or sufficiently implement its CAP within a timely manner may lead to the RTTT program office imposing special conditions or restrictions on the subgrantee's ability to receive grant funds. Special conditions or restrictions may include:

- Additional reporting
- Additional onsite monitoring
- Mandatory technical assistance
- Withholding or suspension of grant funds, with appropriate written notification.

Additional program-specific conditions may also be imposed at the discretion of the respective grant manager. The subgrantee will be notified in writing by the RTTT grant manager if there are any special conditions or restrictions attached to the grant award. The notice will include:

- Nature of the special conditions/restrictions
- Any corrective actions which must be implemented before the conditions/restrictions may be lifted
- The process by which such conditions/restrictions may be appealed by the subgrantee.

ENFORCEMENT

OSSE may enforce the terms and conditions of any RTTT award in accordance with applicable laws and regulations. This includes, but is not limited to 34 CFR § 80.50, the False Claims Act and other District of Columbia laws and regulations. Nothing in this document should be construed to limit the District's ability to enforce the terms of any grant application, grant award notice, or otherwise prevent the District from the lawful recovery of funds.

RESOLUTIONS

The RTTT program office will only consider all findings resolved after the subgrantee has provided sufficient evidence that the corrective action plan has been fully implemented. At such point, a closeout letter will be issued to the subgrantee to indicate that all findings have been resolved and to document which conditions/restrictions have been lifted.

APPENDIX A:
Draft Monitoring Notification & Pre-site Documents Request List

Office of the
State Superintendent of Education

DATE

NAME
TITLE
LEA NAME
ADDRESS
Washington, DC 20017

SUBJECT: RTTT Year 2 Monitoring Review

Dear LEA NAME:

Federal laws and regulations require states to conduct monitoring of state-administered programs. The Office of the State Superintendent of Education (OSSE) for the District of Columbia as the State Educational Agency (SEA) for DC has the fiduciary responsibility of reviewing local education agencies (LEAs) that receive federal entitlement funds for compliance. Under the auspices of the United States Department of Education (USDE), OSSE administers and monitors federally funded programs implemented by Subgrantees. OSSE is responsible for ensuring compliance with federal programmatic and fiscal requirements, such as those set forth in the *Title XIV of the American Recovery and Reinvestment Act of 2009, Race to the Top Program*. In accordance with the state's responsibilities, OSSE will conduct an onsite review at **LEA NAME** for the following Race to the Top priority areas during the year 1 implementation period:

- Common Core Standards
- Data Systems to Support Instruction
- Great Teachers & Leaders
- Turning Around the Lowest Achieving Schools

The RTTT program office has scheduled the onsite monitoring review of **LEA NAME** for 9:30 a.m. on **DATE**. The day will begin with an entrance conference with the authorizing official and any other designated staff. The monitoring process will focus on reviewing the LEAs implementation of the identified RTTT programs. Specifically, the monitoring team will review documents related to implementation of program activities as delineated within the LEA Scope of Work and administration of the grant. Additionally, the team will interview administrators and LEA staff. The lead monitor for the monitoring visit is **NAME.** **NAME** will contact your office to the monitoring visit, at which time we will coordinate the details regarding the agenda and scope of the monitoring visit, as well as respond to any questions.

To assist our office in gaining an overall picture of the current status of program implementation , please review the attached **Pre-site Documents Request List** and submit the documents at least two weeks prior to the onsite review. Please submit an electronic copy of these pre-monitoring documents to (OSSE.RTTTMonitoring@dc.gov) by **DATE**.

Please note the following:

- Failure to submit the pre-monitoring documents by the established deadline will result in a finding in the final monitoring report.
- In addition to the documents requested in both the monitoring indicators and checklist, the State reserves the right to request additional supporting documentation to support the review of entitlement programs.
- It is expected that the monitoring team will be in your school for approximately two days.
- The monitoring team will need a work area and a designated liaison to be available for the extent of the visit. If possible, the team should be provided with internet access.
- At the end of the monitoring visit, the monitoring team will conduct an exit conference with the principal and their designee(s).

Thank you for your continued cooperation as the Office of the State Superintendent of Education makes every effort to ensure that all LEAs are in compliance with our State and Federal requirements. If you have questions or need technical assistance, please call me on 202-654-6112 or by e-mail to darienne.feres-merchant@dc.gov.

Sincerely,

Darienne A. Feres-Merchant
Reporting & Implementation Manager
Race to the Top Team
Office of the State Superintendent of Education

Attachments (1)

cc: Richard Pohlman
Acting Director, Race to the Top Program

Office of the
State Superintendent of Education

Race to the Top Program Monitoring
Pre-site Document Request List

OSSE USE ONLY						
Indicator	**Documentation Requested for Each LEA**	**Submitted**			**Check if not Adequate**	**Compliance Issue – Check if Yes**
		Yes	**No**	**N/A**		
	Did the LEA submit the pre-site docs?					
	Has the LEA submitted reimbursements for the RTTT program according to the established schedule?					
	Has the LEA complied with the RTTT and ARRA reporting deadlines?					
	Have the LEA's reimbursements for this program contained unallowable costs for RTTT or ARRA funds?					

COMMON CORE STANDARDS						
Indicator	**Documentation Requested for Each LEA**	**Submitted**			**Check if not Adequate**	**Compliance Issue – Check if Yes**
		Yes	**No**	**N/A**		

DATA SYSTEMS TO SUPPORT INSTRUCTION

Indicator	Documentation Requested for Each LEA	Submitted			Check if not Adequate	Compliance Issue – Check if Yes
		Yes	No	N/A		

GREAT TEACHERS AND LEADERS

Indicator	Documentation Requested for Each LEA	Submitted			Check if not Adequate	Compliance Issue – Check if Yes
		Yes	No	N/A		

TURNING AROUND LOWEST ACHIEVING SCHOOLS

Indicator	Documentation Requested for Each LEA	Submitted			Check if not Adequate	Compliance Issue – Check if Yes
		Yes	No	N/A		

FISCAL

Indicator	Documentation Requested for Each LEA	Submitted			Check if not Adequate	Compliance Issue – Check if Yes
		Yes	No	N/A		
	LEAs will be required to provide supporting documentation for expenditures submitted for reimbursement from a specified time period within the past quarter.					
	LEA Fiscal Policy and Procedures Manual					
	Federal programs drawdown rate					
	Personnel Expenditures including Time and Effort certifications					
	Most recent A-133 (if applicable) or financial statement audit					
	Internal controls for procurement					
	Allowability and Period of Obligation					
	Cash Management and reconciliations					

Appendix B: Fiscal Progress Report

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RACE TO THE TOP COMPETITIVE GRANTS FINANCIAL PROGRESS REPORT

(Follow form instructions)

1. Race to the Top Competitive Grant Awarded	2. Grant or Other Identifying Number Assigned by OSSE	Page 1	of pages
3. Recipient Organization (Name and complete address including Zip code)			

4a. DUNS Number	4b. EIN	5. Recipient Account Number or Identifying Number	6. Report Type □ Quarterly □ Semi-Annual □ Annual □ Final	7. Basis of Accounting □ Cash □ Accrual

8. Project/Grant Period From: (Month, Day, Year)	To: (Month, Day, Year)	9. Reporting Period End Date (Month, Day, Year)

10. **Transactions**	Cumulative
(Use lines a-c for single grant reporting)	
Cash	
a. Cash Receipts	
b. Cash Disbursements	
c. Cash on Hand (line a minus b)	
(Use lines d-o for single grant reporting)	
Expenditures and Unobligated Balance:	
d. Total Race to the Top competitive grant funds authorized	
e. Race to the Top share of expenditures	
f. Race to the Top share of unliquidated obligations	
g. Total Race to the Top share (sum of lines e and f)	
h. Unobligated balance of Race to the Top competitive funds (line d minus g)	
Recipient Share:	
i. Total recipient share required	
j. Recipient share of expenditures	
k. Remaining recipient share to be provided (line i minus j)	
Program Income:	
l. Total program income earned	
m. Program income expended in accordance with the deduction alternative	
n. Program income expended in accordance with the addition alternative	
o. Unexpended program income (line l minus line m or line n)	

11. Indirect Expense	a. Type	b. Rate	c. Period From	Period To	d. Base	e. Amount Charged	f. Federal Share
				g. Totals:			

12. *Remarks: Attach any explanations deemed necessary or information required by OSSE in compliance with the grant:*

13. Certification: By signing this report, I certify that it is true, complete, and accurate to the best of my knowledge.

a. Typed or Printed Name and Title of Authorized Certifying Official	c. Telephone (Area code, number and extension) d. Email address
b. Signature of Authorized Certifying Official	e. Date Report Submitted (Month, Day, Year)
	14. Agency use only:

Appendix C: Program Progress Report

DRAFT

RACE TO THE TOP COMPETITIVE GRANTS PERFORMANCE PROGRESS REPORT

(Follow form instructions)

1. Race to the Top Competitive Grant Awarded	2. Grant or Other Identifying Number Assigned by OSSE	Page 1	of pages
3. Recipient Organization (Name and complete address including Zip code)			

4a. DUNS Number	4b. EIN	5. Recipient Account Number or Identifying Number	6. Report Type □ Quarterly □ Semi-Annual □ Annual □ Final	7. Final Report? □ Yes □ No

8. Project/Grant Period From: (Month, Day, Year)	To: (Month, Day, Year)	9. Reporting Period End Date (Month, Day, Year)
		Cumulative

10. Performance Narrative (attach performance narrative as instructed by OSSE)

11. Other Attachments (attach other documents as needed or as instructed by OSSE)

12. Certification: I certify to the best of my knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award documents.

12a. Typed or Printed Name and Title of Authorized Certifying Official

12c. Telephone

12d. Email

12b. Signature of Authorized Certifying Official

12e. Date Report Submitted

Appendix D: Draft RTTT Monitoring Tool

RACE TO THE TOP
GRANTS MONITORING
TEMPLATE

DRAFT

The Race to the Top (RTTT) team within the DC Office of the State Superintendent of Education (OSSE) will complete this document as a record of review of its grants. It details the findings of the RTTT review team regarding key areas within the grant. The LEA will be notified of any issues discovered in the course of the review and a request may be made to clarify the issue(s). The RTTT team and LEA will coordinate corrective actions in accordance with the RTTT Monitoring Policy.

LEA Name:		**Date of Monitoring:**	
Address:		**OSSE Contact:**	
Head of School or ED:		**E-mail:**	
Primary Contact:		**Phone:**	
Phone:			
Meeting Attendees:			

SECTION A – SCHOOL LEA INFORMATION
1. Monitoring Year ☐ 2. Type of Monitoring: ☐ Desktop ☐ Site Visit ☐ Other: (please specify) ☐
SECTION B – CHECK ALL APPLICABLE PROGRAMS FOR MONITORING

	Competitive Grants
Race to the Top Formula Funds ☐	**Charter School Teacher Pipelines Competitive Grant** ☐
	Professional Learning Communities of Effectiveness ☐
	Instructional Improvement Systems ☐
	Expanding Student Growth Coverage to Non-Tested Grades ☐

SECTION C - GRANT OVERVIEW	
Program Description (RTTT):	
Program Description (Participating LEA):	

Draft 4.29.11

SECTION I: COMPLIANCE WITH SUBRECIPIENT APPLICATION

Indicator 1.1: Subrecipient is compliant with the requirements set forth in the GAN(s) and RTTT MOU.

Guiding Questions for Indicator	*Acceptable Subrecipient Evidence*	*Subrecipient-Specific Evidence (Insert Items)*
A) How does the subrecipient ensure that funding is used for the award period and in compliance with the terms and conditions of the Performance Agreement and GAN? B) Please provide evidence that demonstrates fidelity between the Race to the Top MOU and GAN to the actual work undertaken with the use of awarded funds. **Ensure:** ☐ Grant files are on-site. ☐ General ledger captures the grant funds. ☐ Subrecipient knows the grant application and is implementing the programs that are outlined in its MOU, Statement of Work and GAN.	☐ Approved grant application. ☐ Award letter. ☐ Performance agreement. ☐ Grant Award Notification (GAN). ☐ Approved budget. ☐ Grant-related correspondence that documents grant award periods. ☐ Other.	☐ Insert Grant Specific Items ☐ ________ ☐ ________ ☐ ________ ☐ ________

Indicator 1.2: Subrecipient is compliant with data collection requirements set forth in the OSSE Race to the Top application and MOU.

Guiding Questions for Indicator	*Acceptable Subrecipient Evidence*	*Subrecipient-Specific Evidence (Insert Items)*
A) Does the LEA comply with OSSE data collection policy and the data submission requirements under Race to the Top? B) How does the LEA track data, including student and staff demographics, teacher effectiveness, and discipline data? C) Does the LEA have a sound system for collecting and reporting data, including access to up-to-date information?	☐ Copies of all data submission to OSSE and PCSB for the last year. ☐ Data collection handbook or policy. ☐ Other.	☐ Insert Grant Specific Items ☐ ________ ☐ ________
Responses/Comments	*Findings from Evidence Review*	*Findings from Review of Subrecipient-Specific Items*

Next Steps:

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SECTION II: QUALITY AND PERFORMANCE ASSESSMENT

Indicator 2.1: Subrecipient is prepared to transition to the Common Core State Standards and high quality, aligned interim assessments.

Guiding Questions for Indicator	*Acceptable Subrecipient Evidence*	*Subrecipient-Specific Evidence (Insert Items)*
A) Describe how the subrecipient measures and determines its progress towards the objectives of its approved Common Core transition plan. B) Does the subrecipient demonstrate fidelity to the approved transition plan? Has the subrecipient's strategy or approach changed since the transition plan was approved? C) How is the Common Core being integrated into all grades and subjects? D) Describe the successes or challenges of integrating the standards into the curriculum. How has the school engaged teachers in non-tested grades and subjects? E) Describe the successes and challenges of providing parent information sessions.	☐ OSSE-approved Common Core transition plan. ☐ Attendance sheets from parent information sessions. ☐ Attendance sheets and agendas from LEA or school-wide professional development sessions. ☐ Project plan, professional development plan or other documentation that shows progress towards milestones.	☐ Insert Subrecipient-Specific Items ☐ ______ ☐ ______ ☐ ______ ☐ ______
Responses/Comments	*Findings from Evidence Review*	*Findings from Review of Subrecipient-Specific Items*

Next Steps:

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Indicator 2.2: Subrecipient is developing or fostering a data-driven culture and using student data to inform instruction.		
Guiding Questions for Indicator	***Acceptable Subrecipient Evidence***	***Subrecipient-Specific Evidence (Insert Items)***
A) Describe how the LEA incorporates student data into instructional decisions. How does it generate and analyze information on student outcomes? B) Describe the role of the dedicated data lead. How often does this staff member meet with classroom teachers? How does this staff member support teachers in all grades and subjects? C) What steps has the subrecipient taken to ensure that it will improve educational outcomes for all students? F) Does the subrecipient demonstrate fidelity to the approved instructional improvement plan? Has the subrecipient's strategy or approach changed since the transition plan was approved? D) What progress has been made in achieving the milestones in the MOU and approved application?	☐ Position description and resume for data lead. ☐ DC-CAS or other student assessment results. ☐ OSSE-approved instructional improvement system plan. ☐ Project plan, professional development plan or other documentation that shows progress towards milestones. ☐ Other academic performance information.	☐ Insert Subrecipient-Specific Items ☐ ____ ☐ ____ ☐ ____ ☐ ____
Responses/Comments	***Findings from Evidence Review***	***Findings from Review of Subrecipient-Specific Items***
Next Steps:		

Indicator 2.3: Subrecipient is improving teacher and principal effectiveness.		
Guiding Questions for Indicator	***Acceptable Subrecipient Evidence***	***Subrecipient-Specific Evidence (Insert Items)***
A) Describe the LEA's teacher evaluation system. What are the components besides the 50% teacher value added measure? B) How does the LEA use this evaluation in human capital decisions? What types of human capital decisions have been made since the evaluation has been adopted? C) How many teachers are highly effective? Effective? Minimally Effective? Ineffective? D) How does the principal evaluation incorporate teacher evaluations? E) Does the subrecipient demonstrate fidelity to the approved	☐ OSSE-approved teacher evaluation plan. ☐ OSSE-approved principal evaluation plan. ☐ Evidence that the evaluation plan has been used in human capital decisions (e.g., professional development plans, retention decisions, bonuses) ☐ Materials describing the LEA's evaluation systems to staff. ☐ Project plan, professional development plan or other documentation that shows progress towards	☐ ____ ☐ ____ ☐ ____ ☐ ____

instructional improvement plan? Has the subrecipient's strategy or approach changed since the transition plan was approved? F) What progress has been made in achieving the milestones in the MOU and approved application?	milestones in the MOU.	
Responses/Comments	***Findings from Evidence Review***	***Findings from Review of Subrecipient-Specific Items***
Next Steps:		

SECTION III: FISCAL MANAGEMENT AND ADMINISTRATION		
Indicator 3.1: Financial Management and Procurement		
Guiding Questions for Indicator	***Acceptable Subrecipient Evidence***	***Subrecipient-Specific Evidence (Insert Items)***
A) Can the LEA provide the policy(ies) for the process of an expense going from the SOW to ordering and procurement, to the accurate documentation of expenditures?	☐ Policy or Handbook ☐ Internal controls in place for procurement	☐ ☐
B) Describe what internal controls are in place to ensure that expenditures coded to Race to the Top funds are consistent with the approved application.	☐ Policy or Handbook ☐ List of codes in accounting system	☐ ☐
C) What internal controls are in place to ensure that contract requirements are being fulfilled by vendors and are consistent with the approved SOW?		☐ ☐
D) Show evidence that personnel expenditures charged to Race to the Top match the OSSE approved SOW.	☐ Salary and benefits for each staff member	☐ ☐
E) Funds are obligated and liquidated in a timely manner.	OSSE will bring a brief report on timely obligations and liquidation of funds to discuss with the LEA onsite.	
F) Amount of disallowed expenditures are kept to a minimum.	OSSE will bring a brief analysis showing the history of disallowed costs and discuss with the LEA onsite.	

Indicator 3.2: Compensation for Personnel Services		
G) How has the LEA ensured fidelity to its time and effort policy? Is the LEA accurately reporting FTEs supported by Race to the Top funds?	☐ Approved SOW ☐ List of personnel by funding source ☐ Payroll records ☐ A-87 certifications for employees funding 100% from RTTT funds ☐ PAR or Time and Effort logs for employees in "split-funded" positions ☐ Evidence payroll is verified for accuracy and reconciled against personnel records at regular intervals ☐ Quarterly reconciliation reports ☐ Quarterly ARRA job creation reports	
H) Personnel files and record system includes all official documents related to the employment of each staff member participating in grant supported activities. (Monitor will ask for a list of employees and pull sample files from the list.)	☐ Personnel actions related to hiring, separations, promotions, commendations, dismissal or other areas ☐ Verification that background checks were conducted on all employees	
I) An organizational chart is kept on file and is up-to-date.	☐ Copy of organizational chart that includes job titles, position descriptions, and differentiation between levels of responsibility	
J) Internal controls exist for payroll.	☐ Written policy and procedures implemented ☐ Internal controls are in place that forbid and prevent the issuance of payroll checks prior to time and attendance being approved ☐ Internal controls that prevent the continual payment to terminated employees ☐ Segregation of duties: payroll checks are distributed by someone other than persons who prepare payrolls, supervise employees, approve time reports or sign paychecks ☐ All records concerning personnel and pay rates are adequate and current	
Indicator 3.3: General Accounting Practices		
K) Accounting policies and procedures manual is accessible, current and in use.	☐ Manual or set of procedures	
L) Segregation of Duties: LEA divides duties among employees responsible for procurement, approval, verification (pre-audit) and disbursement functions.	☐ No one person performs all financial operations and procedures ☐ LEA maintains a master list of all persons authorized to sign or approve purchase requisitions, purchase orders, receiving reports, invoices (e.g., approval for payment, time and attendance records) ☐ Financial records are kept in a secure place	

Indicator 3.4: Procurement Procedures		
M) Purchasing practices and policies are in writing.	☐ Handbook or Procurement Policy	
N) Expenditure transaction files are maintained and enable LEA to easily locate supporting documents for any transaction.		
O) Price or cost analyses have been performed on all procurements in compliance with published protocols.		
P) PCSB approval has been obtained in contracts that exceed $25,000 (Charters Only).		
Q) Maintains a written code of standards of conduct for any employee involved in the award or administration of contracts, including conflicts of interest and accepting gifts.	☐ Policy or Handbook	
R) Contractors are in good standing and not on the Excluded Party List.		
Indicator 3.5: Audits and Reports		
S) Copies of the two most recent A-133 single audit reports are on file.	☐ Audit reports	
T) Any reports issued by OSSE about the LEA within the last two years are on file.	☐ OSSE reports	
U) Most recent PCSB review reports are on file (Charters Only).	☐ PCSB reports	
V) Copies of LEA corrective action plans and related approval documents are available.	☐ Corrective action plans	
W) Previous audit findings have been addressed.	☐ Audit corrective action plan and documentation of progress in implementing plan	
Responses/Comments	***Findings from Evidence Review***	***Findings from Review of Subrecipient-Specific Items***
Next Steps:		

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Appendix E: OSSE Payment Process Memorandum

DC Office of the State Superintendent of Education

November 13, 2008

(X) Action Required
(X) Informational

MEMORANDUM NO. 007-08M GRANTS ADMINISTRATION

TO: Local Education Agencies
Office of the State Superintendent of Education Sub-Grantees

CC: Public Charter School Board

FROM: Deborah A. Gist
State Superintendent of Education

RE: Payment Process for Federal Grant Funds

The purpose of this memorandum is to set forth the Office of the State Superintendent of Education's (OSSE) federal grant's payment process provisions for all sub-grants covered by the No Child Left Behind Act (NCLB) consolidated application and the Individuals with Disabilities Education Act

The U.S. Department of Education (USDE) has designated the District of Columbia a high-risk grantee for federal education funds. This designation was imposed, in part, to require the District and its sub-grantees to strengthen their management of federal education funds to ensure they are expended in accordance with all applicable legal requirements. The OSSE is making a significant effort to improve the administration of our federal education grant programs in order to comply with all federal requirements.

As a part of that effort, the OSSE is implementing new payment procedures for the 2008-2009 program year. In accordance with section 80.21(d) of the Education Department General Administrative Regulations (EDGAR) the OSSE is implementing a reimbursement process for all sub-grantees (i.e. LEAs, CBOs). This means that sub-grantees will receive payments after they substantiate that the cost is allowable and is relevant for submitted program expenditures. Reimbursements will be processed upon receipt of the documentation to support those expenditures.

Overview of Payment Process

In order to receive federal education funds, sub-grantees must establish eligibility by submitting an application to the OSSE in accordance with relevant program statute(s), and any additional rules established by the OSSE. Once the OSSE has fully approved the application and issued an official Grant

Award Notification, sub-grantees may submit reimbursement requests (containing valid costs paid by the sub-grantee) monthly, every other month or quarterly to the OSSE to review and process.

To request a reimbursement, sub-grantees must submit the completed Federal Grant Reimbursement Forms (applicable attachments). Completed forms, including signature must be submitted electronically to Monthly.reimbursement@dc.gov.

Sub-grantees are not required to submit any supporting documentation with the Federal Grant Reimbursement Forms (applicable attachments). *However, sub-grantees* are *required to maintain all necessary supporting documentation and to ensure such documentation is available to the OSSE, the U.S. Department of Education and other authorized entities for review, upon request.* Consistent with section 76.730 of EDGAR, sub-grantees must maintain records that show:

- The amount of funds available under the grant;
- How the LEA used the funds;
- The total cost of the project;
- The share of that total cost provided from other sources; and
- Other records to facilitate an effective audit.

While it is impossible to provide an exhaustive list of all of the documents that might be needed to support a particular cost, commonly requested records may include:

- Payroll transactions
    - A list of employees paid with federal grant funds
    - Job or position descriptions
    - Time and effort records demonstrating employees worked on grant activities (e.g. semi-annual certifications, personnel activity reports)
    - Time and attendance records demonstrating when employees worked (e.g. timesheets, leave slips, etc.)
    - Evidence of payroll reconciliations
    - Accounting records indicating how salaries were charged
    - Payment records indicating how salaries were paid
- Procurement transactions
    - Requisitions
    - Cost estimates
    - Requests for bids, proposals, etc. (as required by the sub-grantee's procurement procedures)
    - Copies of bids, proposals, etc. submitted
    - Evaluation documents (as required by the sub-grantee's procurement procedures)
    - Purchase orders or contracts
    - Invoices
    - Proof items purchased were received
    - Inventory records

Sub-grantees are responsible for ensuring all costs charged to federal grants are allowable. If the OSSE determines, at any time, that a cost is unallowable it may disallow the cost. If the sub-grantee has already been reimbursed for the cost it may be required to repay funds to the OSSE.

If you have any questions about this new payment process, please contact your OSSE program manager. Questions about general grants administration should be directed to Cynthia Bell. Questions about specific grant programs (i.e., Title I, Title II, Title III, IDEA, etc.) please contact the program manager directly. A program directory is attached.

The OSSE will provide a series of trainings in order to assist programs in meeting these requirements. A schedule is forthcoming.

Appendix F: Draft DC RTTT Monitoring Schedule

Office of the
State Superintendent of Education

District of Columbia Race to the Top Monitoring Schedule

The RTTT team will conduct monitoring activities through both **desktop** and **onsite** monitoring. All subgrantees will receive at least one onsite monitoring visit during the period of the grant. In instances where subgrantees do not receive an onsite visit during the course of a particular program year they will be monitored through desktop monitoring. If selected for an intensive desktop review, subgrantees will be notified at least four weeks in advance and will be informed of any pre-monitoring documentation they should prepare and submit to the RTTT team.

* LEAs who are recipients of competitive grants will be monitored at least annually, and these visits will be conducted in coordination with the regular onsite RTTT visits.

ONSITE REVIEWS		
SY 2011 - 12	**SY 2012 - 13**	**SY 2013 - 14**
Achievement Prep PCS Bridges PCS Center City PCS Cesar Chavez PCS Community PCS D.C. Bilingual PCS DCPS E.L. Haynes PCS Howard Road PCS Hyde PCS Maya Angelou PCS Meridian PCS Options PCS Paul PCS Tree of Life PCS William E. Doar PCS	AppleTree PCS Arts & Technology PCS Capital City PCS D.C. Prep PCS Elsie Whitlow Stokes PCS Excel Academy PCS Friendship PCS Hope Community PCS Hospitality PCS IDEA PCS Imagine S.E. PCS KIPP PCS Potomac Lighthouse PCS Thurgood Marshall PCS Ideal PCS	❖ TBD

❖ OSSE will conduct limited onsite monitoring visits during the final implementation year. At the discretion of the state, LEAs will be selected for monitoring based on previous monitoring findings and required follow up.