

**Oregon 21st CCLC Monitoring**

**Process**

Program Review of 21st Century Community Learning Centers Title IV-B



**Risk Based Monitoring Selection Criteria**

**General Information**

ODE follows a risk-based approach to identify where it should use monitoring resources. This approach includes several analyses of risk factors to guide selection of the local educational agencies (LEAs) that will receive a desk review and on-site Program Monitoring review. This enables the ODE to focus its monitoring resources to foster student achievement and fiscal compliance. These risk factors identified are not, by themselves, evidence of noncompliance.

**Monitoring Selection Using Risk Factors**

ODE considers several risk factors, including compliance history, academic achievement, program size, and fiscal analysis in identifying and selecting Title IV-B LEAs for reviews. For each cycle the number of LEAs selected for monitoring varies based on data available and risk assessment results.

**Academic Achievement**

Relying on the student academic outcome measures approved in the proposal reports, ODE chooses Title IV-B grantees for reviews based on two categories of academic achievement.

1. If Title IV-B academic growth goals are not met, ODE considers the grantee for review.
2. The second category of academic achievement is the LEA’s clarity of academic program organization and point of service academic systems.
3. Student time spent weekly in engaging quality academic services
4. Degree of individualization and alignment in academic skill development
5. Degree of extended learning strategies determined from Year-End Reports
6. The number of students served compared to the number approved in the original proposal. Recruitment, alignment with regular day and student engagement are functions that contribute to attendance and positive outcomes. If numbers are below 75% of proposed numbers, academic offerings often need improvement, and the chance of selection is greater.

**Fiscal Analysis**

ODE also examines several aspects of potential fiscal risk. Grantees with high (1) per pupil allocations and (2) carryover percentages will be looked at more closely. These indicators of program fund usage, deviation from proposed amounts and high cost per pupil results in a grantee being more likely to be selected for a review.

**Data Reporting**

In order to apply the risk factor selection criteria, current verified data must be available for each Title IV-B grantee center served. Initial information must be included in the required Year-End Report. Additionally, if student and Family Engagement Goals are not Specific, Measurable, Appropriate, Realistic and Time-Bound (SMART) and do not align with or measure the proposed and approved outcomes, then data that is submitted is not reliable. Therefore, if a grantee does not submit and verify student academic outcome data measures, student enrollment or other required program and fiscal data, then it is very likely that the LEA will be selected for a review.

**Supporting 21st CCLC Grantees through Technical Assistance and**

**ESEA Monitoring**

**Purpose**

The Oregon Department of Education (ODE) Federal Systems Team has the responsibility to review compliance of local education agencies (LEAs) within the federal Elementary and Secondary Education Act (ESEA) consolidated programs. All Title IV, Part B 21st Century Community Learning Centers (CCLC) sub-grantees will be monitored for compliance with applicable laws and regulations. Basic level monitoring includes a review of the originally funded application and any subsequent amendments.

The Title IV, Part B monitoring process includes supporting districts in the implementation of this program through the following:

* Approval of the Annual Program Spending Plan & Renewal Packet
* On-site Technical Assistance
* Review of program implementation evidence through Desk and/or Onsite Monitoring

In addition to ESEA Title IV Part B monitoring, ODE also seeks to identify local programs to serve as best practice models in meeting student, family, staff, schools and communities within the various programs being monitored. Programs showing high levels of student academic performance are of particular interest.

**Program Spending Plan & Renewal Packet Approval**

Title IV Part B (21st CCLC) local grantees are required to annually submit the Program Spending Plan and Renewal Packet that includes each funded site in their grant. ODE staff members also review and approve Budget Narratives, ensuring responsible and allowable spending of federal funds within the context of the grantee’s approved grant. The annual budget and program plan are due to ODE no later than June 30th of each year.

**Desk Monitoring**

Title IV Part B grantees receiving federal funds may be desk monitored during alternating years of site monitoring. Toward the end of the school-year, districts will be selected to have required materials ready to be reviewed the following year during the monitoring period. Selection of these districts will be made on the basis of risk factors as well as by region. Risk factors include, but are not limited to, the following:

* Federal program budget issues as determined through the Program Spending Plan, Renewal Packet review, and irregularities in submitting expense claims to Electronic Grants Management System (EGMS)
* Significant and/or unresolved findings issued to the participating district as a result of district fiscal audits
* On-going and/or unresolved Title IV Part B findings from previous monitoring
* New or inexperienced staff in key program positions or frequent turnover
* Required reports incomplete or not submitted
* Low participant numbers compared to the proposed projections
* High-end cost per child

Following a grantee’s desk monitoring, ODE may elect to make an onsite visit or a technical assistance visitas a means to follow-up with a grantee and partners. The criteria used to make this determination will be based on the factors including, but not limited to, the risk factors listed above, the number of programmatic issues, the types of programmatic issues, and completeness of required materials submitted during the desk monitoring review.

**Onsite Monitoring**

ODE will schedule a one to two day visit (depending on the size of the project) to review program implementation, evaluate implementation of requirements, and provide the district with resources and support. Site visits will be completed during the 1st, 2nd, and 3rd year of the grant. Districts selected for an onsite visit are strongly encouraged to seek assistance in preparation for the onsite visit. During the onsite visit, a team from ODE will interview district and grant staff, visit schools, and conduct site reviews. A detailed schedule of the visit will be coordinated with the grantee’s Title IV Part B project director prior to the onsite visit.

**Technical Assistance**

Before or following a desk or onsite monitoring, ODE may elect to provide a grantee with an individual technical assistance visit. The goal of a one to two day technical assistance visit is to work directly with grantee staff to resolve areas of non-compliance and support the district in program development, implementation, and performance.

**Preparation for Desk Monitoring or Onsite Visit**

Districts will submit the required evidence to ODE prior to desk monitoring or onsite visits. Documents can be submitted either hard copy or electronically (preferred). These documents must arrive at the scheduled time, to allow ODE sufficient time to review materials. Evidence of the items listed as assurances in the approved Title IV Part B grant proposal will be reviewed during onsite visits and during desk monitoring. The following diagram explains the various categories of evidence reviewed for monitoring.

|  | Examples in this category:  Previously Submitted |  | Examples in this category:  Assurances |  | Examples in this category:  Evidence to be submitted |
| --- | --- | --- | --- | --- | --- |
|  | * Sub grantee application as originally approved with amendments * EGMS claims history * A-133 Audit * Federal required data report for grantee and ALL funded sites * Year-End Reports * Site evaluation worksheets * Student Selection Process & Documentation * Coordination with School Improvement Goals * Alignment with district priorities * Family Engagement Plan & Implementation Records * Annual progress reports and other data * Self-evaluation reports * Homeless Education * Liaison coordination |  | * Safe & Easily Accessible Facility Evidence of Drills * Evidence of ongoing active collaboration with schools students attend * Supplement/not Supplant * Inventory Items Labeled with annual updates * Evidence of compliance with Equitable Services for Private Schools * Project will be carried out as proposed in the application. * Proposed changes must be submitted & have prior ODE written approval * Policies Preventing Barriers to Enrollment |  | * Completed unedited attendance roster for ten days prior to the site visit for ALL sites * Completed documents of recruitment selection and enrollment with detailed reports of all other funds used to support the Title IV-B program activities * Activity calendars and schedules with lesson plans for the past 10 days for ALL sites * Title IV-B grant organizational chart showing names, job title, and FTE for each person * Expenditure reports for the most recent year * Site evaluation worksheet for each grant site, including the actual daily attendance |

**Overview of Federal Law References (Monitoring Checklist)**

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| **Needs & Resources: Section #1**   * Needs Assessment * Recruitment * Attendance: (See site evaluation) * Dissemination | **Partnerships: Section #2**   * Partnerships * Partner(s) contribution * Collaboration & Communication * Coordinated Funding * Sustainability Plan |
| **Program Design: Section #3**   * Academic Activities: (See calendar/lesson plans) * Aligned with OR State Standards * Enrichment Activities * Family Education Activities * Program Hours/Schedule: (See site evaluation) * Safety * Principles of Effectiveness | **Management & Staffing: Section #4**   * Management Plan * Staff & Volunteer Training * Appropriately qualified |
| **Program Evaluation: Section #5**   * Evaluation Plan * Improved performance measures * Public notice | **Fiscal Compliance: Section #6**   * Funding account * Inventory * Labeled for Title IV-B * Time and Effort Schedules * Supplement not Supplant * Prior audits resolved * Non-allowable costs * Program management changes * ODE notified of changes |
| **PRIVATE SCHOOLS: Section #7**   * Equitable Services – Professional Development * Equitable services - students & teachers * Dispute Resolution * Requirements of Consultation * Services to private school children | **Data**   * Annual Year-End Report * Annual Federal Data Collection * Other |