MONITORING GUIDE

Federal Program Title	Expanding Opportunity Through Quality Charter Schools Program (CSP)—Grants to State Entities
Federal Agency	U.S. Department of Education
State Entity (Charter School Support Organization)	Northeast Charter School Network
CFDA Number	84.282A
Award Name	Great Schools for Connecticut Project
Award Number	S282A220007

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Introduction

In September 2022 the Northeast Charter Schools Network (NECSN) was awarded $24.5 million for the Great Schools for Connecticut (GSCT) Project by the U.S. Department of Education (Department) under the FY 2022 Charter Schools Program (CSP) State Entities Grants Program. The grant is to be administered by the Connecticut Charter School Association (CTCSA), a membership organization, and the statewide advocacy voice for Connecticut's public charter schools and the students they educate. The CSP Grants to State Entities program (84.282A) is a competitive grant program that enables State entities to award subgrants to eligible applicants in their State to open and prepare for the operation of new charter schools and to replicate and expand high-quality charter schools.

The Great Schools for Connecticut (GSCT) Project Team engages in a range of thorough and differentiated monitoring activities designed to ensure that all CTCSA CSP subgrantees are implementing with fidelity the activities described in their subgrant applications. Grant funds must also be used by CTCSA to provide technical assistance to eligible applicants in opening and preparing for the operation of new charter schools or replicating or expanding high-quality charter schools. This Monitoring Guide and the accompany Monitoring Rubric Sheet will track applicant and subgrantee progress through the duration of the subgrant award to monitor whether awardees are meeting their project goals and federal reporting requirements. Subgrant recipients will receive general and need based technical assistance at various stages of their grant to ensure they are well equipped to meet the grant goals outlined in their approved applications.

Subgrantees are required to participate in all monitoring, reporting, and related technical assistance activities as a condition of receiving CSP funding. Subgrantees will be required to provide documentation (including completing a portion of the accompanying Monitoring Rubric Sheet) at least annually, and to participate in periodic on-site reviews at different stages of the application and grant implementation process. Prospective applicants and subgrantees who receive funding in the various grant cycles will be monitored during the stages outlined below. Subgrantees will have access to a reporting system on Basecamp, the online reporting system used by GSCT, and all monitoring and reporting submissions will be submitted on this site.

Table 1. Timeline for GSCT Subgrantee Monitoring and Technical Assistance

Activity	Stage
Pre-Award Activities	
Applicants complete Letter of Intent (LOI) / Eligibility Check	Must be completed prior to initiating grant application.
Request for Applications (RFA) due, including supporting documentation	Applicants found to be eligible after the Eligibility Check will be invited to apply for the CSP grant through the RFA.
Self-Risk Assessment Screen due from applicants	Part of RFA
Application Technical Assistance (TA) and Office Hours (*optional*)	GSCT will provide applicants with TA throughout the subgrant application period.
SMART Grant Project Goals and subgrant budget reviews Budget and SMART Goal setting technical assistance (TA) and Office Hours (*optional*)	Technical Assistance call(s) will be scheduled before the subgrant award is finalized.

Capacity Interviews	Prior to the final award peer reviewers will have the opportunity to ask clarifying questions about the application.
Post-Award Activities	
Subgrant Post-award Call	After award subgrantee and GSCT and will complete the Monitoring Rubric Sheet.
Programmatic Desk Reviews	Programmatic reporting to be submitted per timeline indicated at time of grant award, and at a minimum the Monitoring Rubric Sheet will be updated and submitted on an annual basis. If subgrantees received a Corrective Action Plan (CAP), TA activities are required.
Fiscal Desk Reviews	The GSCT team will review subgrantee budget reconciliations on a monthly basis and subgrantees will have to submit monthly reimbursement requests. Budget amendments will be made on a quarterly basis during the grant cycle.
Implementation Site Visits	GSCT will visit subgrantees at least annually during Subgrant Year 1; frequency in subsequent subgrant years determined by risk assessment.
Subgrantee Board Meeting Attendance and review of Board Meeting minutes	GSCT will attend subgrantee board meetings at least semiannually in Subgrant Year 1; and at least annually in subsequent subgrant years. Subgrantees will be required to submit minutes of all board meetings to the GSCT team
Share monitoring findings with subgrantees	GSCT will share monitoring findings upon completion of each desk review cycle
Share monitoring information with CSDE	GSCT will share monitoring information with the CSDE at least annually
TA and training	As needed (frequency and topics determined by risk assessment)
Corrective Action Plans (CAPs)	GSCT to create and monitor adherence to CAPs; timeline dependent upon identification of areas of noncompliance or assessment of enhanced risk
Make monitoring findings and Corrective Action Plans available to families and general public on the GSCT website and on subgrantee websites	Annually
Annual Performance Report and Annual Financial Reports due	Annual reports are due within 90 days at the end of each fiscal year
Final Performance Report due	Within 90 days of the end of each subgrant term

Pre-Award Monitoring Activities

Monitoring activities will begin during the subgrant application process and will consist of an eligibility check; a review of academic, operational, and financial documentation; a self-risk assessment; and a capacity interview. GSCT will also require all tabs in the Monitoring Rubric sheet to be completed at the time of the post-award call. This tool will be updated annually by the subgrantee and reviewed by GSCT.

- **Letter of Intent | Eligibility Checklist**
  Prospective subgrantees will be required to submit a Letter of Intent (LOI) that functionally serves as an eligibility screen. The GSCT team will review the LOI to verify the eligibility of each potential applicant before extending invitations to respond to the full RFA. Examples of verifications required and documentation that may fulfill verification requirements are listed in Appendix 1.

- **Request for Application submission will include Academic, Operational, and Fiscal Documents and Review**
  In conjunction with their subgrant proposals, applicants will be required to upload a range of documentation that will be used to
  ensure
  compliance with pertinent federal and state requirements and to establish a baseline for the GSCT team to assess risk, provide technical assistance, and monitor improvements. Documentation that will be requested in this stage is listed in Appendix 2. For further details on the data required annually refer to the Monitoring Rubric Sheet.

- **Self-Risk Assessment**
  In conjunction with their subgrant proposals, applicants must complete the Self-Risk Assessment Screen that is part of the RFA. Subgrantee answers may be discussed during the Capacity Interview or Post-Award Call and will be used to assess risk, provide technical assistance, consider corrective actions, and monitor improvements.

- **Application Technical Assistance**
  GSCT will hold office hours throughout the LOI and RFA period to allow applicants access to GSCT staff during stages of the grant application. Applicants may schedule time to receive individualized support throughout the application process.

- **Applicant SMART Grant Goals and Budget Reviews**
  Applicants must articulate goals that they will pursue over the life of the project. The GCST team will offer TA to assist subgrant applicants in formulating goals that align with the school's overall mission and key design elements and pertain directly to activities that will be undertaken with CSP funds. Subgrantees must report progress towards SMART Goals as part of the annual monitoring process and progress towards goal fulfilment will be captured in tab 7-SMART Goals of the Monitoring Rubric Sheet.

- **Capacity Interview**
  The final step of the application process will consist of a capacity interview, during which the peer reviewers who scored the applicant's RFA response will speak with representatives from that applicant. Applicants affiliated with management organizations will be encouraged to bring individuals affiliated with the applicant school for the interview, and those seeking competitive preference points under the 'high-quality

educator and community-centered charter schools' priority will be strongly encouraged to have educator and/or community representatives in attendance. This process will supplement the initial application review, and reviewers will have the opportunity to adjust their final scores based on the quality of the applicant team's responses and the extent to which they demonstrate ability to execute its proposed project. Analysis and findings will be recorded by peer reviewers in the final peer review submission.

Post-Award Monitoring Activities

Once applicants have been awarded CSP funds, they will be required to participate in routine and ongoing monitoring activities including, but not limited to, desk reviews, site visits, board meeting attendance, performance reporting, and technical assistance as required.

- **Sub-grant Post Award Call**
  All subgrant award recipients are required to participate in the post-award call. During the call the GSCT team will review monitoring expectations and provide Monitoring TA including walking subgrantees through the Monitoring Rubric Sheet. Subgrantees will be asked to complete tab 3_ Self-Risk Assessment of the sheet prior to the call and CTCSA will use this information to determine a baseline level of risk for the grant and determine monitoring timelines and frequency of reporting.

- **Desk Review**
  Subgrantees will participate in programmatic and fiscal desk reviews throughout their grant periods. Desk reviews will occur at least quarterly in Year 1 and at least semiannually in subsequent subgrant years. See Appendix 4 for examples of areas covered during programmatic and fiscal reviews. Tab 4_Programmatic Compliance and Tab 5_Fiscal Compliance in the accompanying Monitoring Rubric Sheet contain further detail. Subgrantees will also be required to complete tabs 1 and 2 of the Monitoring Rubric Sheet (Demographics & Enrollment and State Performance Measures) at least annually. GSCT will also populate monitoring tabs based on observations and routine questions.

- **Site Visits**
  Implementation site visits will occur at least annually during Year 1 with frequency of visits in subsequent years driven by a subgrantee's risk assessment status. The purposes of the site visit are (1) to complement the desk review in allowing monitors to assess how grant-supported programs are being implemented and grant funds are being expended; (2) to identify areas of need in which technical assistance would be beneficial; and (3) to assist subgrantees as they transition toward planning for post-grant sustainability. The site visit will consist of a review of all physical items purchased with subgrant funds, classroom observations, and interviews with key stakeholders. GSCT will document findings from site visits in the relevant sections of the Monitoring Rubric Sheet.

- **Board Meeting Attendance**
  GSCT project team members will attend subgrantee board meetings at least semiannually in Year 1 and at least annually (with frequency dictated by risk assessment findings) in the ensuing years. Attendance at these meetings is designed to ensure that

the school's governing body is exercising appropriate oversight and remaining engaged on academic, operational, and financial matters as it discharges its fiduciary responsibilities. Findings will be documented in the Monitoring Sheet in tab 6_Grant Governance.

- **Performance and Financial Reporting**
  Subgrantees will be required to file an Annual Performance Report (APR) and an Annual Financial Report (AFR) within 90 days following each subgrant fiscal year. The APR covers progress toward meeting project-specific goals and provides an opportunity for subgrantees to demonstrate organizational health and fiscal viability. The AFR reports on actual expenditures with grant funds. Findings will be documented in tabs 4, 5, 6 and 7 of the Monitoring Rubric Sheet (Programmatic Compliance, Fiscal Compliance, Grant Governance, and SMART Goals).

  In addition to buttressing the GSCT Project Team's efforts to monitor programmatic and fiscal compliance, the APR will provide insight into an array of indicators related to subgrant implementation. Specifically, the Project Team will request that subgrantees report on the following indicators:
  - Implementation of vision for project as described in subgrant application
  - Progress toward grant project goals
  - Implementation of educational model as described in application
  - Implementation of plan to promote access and equity as described in application
  - Implementation of plan to engage families and communities as described in application
  - Implementation of organizational plan as described in application

  Subgrantees are also required to submit a Final Performance Report (FPR) within 90 days of the end of their final grant year. The FPR will contain the following:
  - Executive summary (no more than one page)
  - Report on each grant project goal, including a summary of the progress made on each goal and objective
  - A report on the academic achievement and growth of the school
  - Financial narrative report on how the grant was expended for each of the grant years and the totals for the subgrant period
  - Expenditure report that details 100 percent of awarded grant funds and includes an inventory of all equipment and non-consumable goods purchased with CSP grant funds (EDGAR §80.32. §74.34)

Risk Assessments and Corrective Action Plans

Monitoring findings will be shared with subgrantees and discussed during routine check-in calls with the GSCT administrative team. The depth and breadth of monitoring requirements will be predicated on the extent to which subgrantees are assessed as posing enhanced programmatic or fiscal risk. In addition to findings of 'noncompliance' on any indicator, additional risk assessment factors include (this list is not exhaustive):
- Projected enrollment not met
- Technical assistance requirements not satisfied
- Funds not spent in a timely or allowable manner
- Required reporting not completed
- Significant audit findings

- Failure to participate in required dissemination or evaluation activities
- Increased media presence
- Noncompliance with authorizer.
- Significant leadership / staff / student turnover
- Inability to meet (or make sufficient progress towards) academic and growth targets

Identification of such risk factors may result in increased reporting, more frequent monitoring, additional technical assistance, imposition of conditions, corrective action, grant amount reductions, and/or grant suspension or termination. To ensure transparency, CTCSA will annually publish on its website a comprehensive list of monitoring findings and an overview of the corrective action plans that have been imposed and fulfilled. Each subgrantee will also be required to post monitoring findings and (if applicable) corrective action plans on its website.

Corrective Action Plan Template

School	
Review Period	
Notice Date	
Project Contact Person	
Board Chairperson	
Area of Concern	

Area of Concern / Summary of Recommended Follow-Up	Corrective Action Plan	Person(s) Responsible for Implementation	How Implementation Will Be Monitored and Evaluated	Timeline & Target Date for Completion	Status

Appendix 1: List of Verifications required during the Eligibility Check (not exhaustive, may change in subsequent grant years):

Verification Required	Document(s) satisfying this requirement
Approved new / revised charter from CSDE	Copy of charter certificate (all applicants).
Notification Letter to the CSDE	Copy of the complete Notification Letter and a PDF copy of the email sent to CSDE with Notification Letter attached (all applicants).
At least three-year renewal notice from CSDE (expansion and replication applicants only).	Three-year renewal notice
Not-for-profit 501c(3) status (all applicants).	IRS letter confirming 501c(3) status (all applicants).
Proof applicant has not received a previous CSP award for the same purpose that GSCT funds are being requested	Documentation pertaining to any previous federal grant funding received
Evidence of strong academic results, including academic growth and achievement scores (as measured by Next Generation Accountability results - expansion and replication applicants to provide at least three years of available results if available)	Next Generation Accountability results - provide at least three years of available results (expansion and replication applicants only).
No significant issues identified by authorizer in the areas of student safety, school finances, operational management, statutory / regulatory compliance.	Provide school's most recent renewal notice from CSDE (expansion and replication applicants only).
Evidence of good standing with lenders no delinquency / delays in loan repayments for outstanding debt.	Provide at least three years of audited reports (all applicants, new applicants may provide bank letter indicating good standing).
Evidence of a student waitlist	Waitlist from school (expansion and replication applicants only).
Evidence of strong, stable leadership and governance.	Details of board composition, bios of leaders, board members, including tenure and remaining length of term for all.
If contracting with a CMO / EMO the school must provide a description of the roles and responsibilities of eligible applicants, partner organizations, and charter management organizations (CMO / EMO), including the administrative and contractual roles and responsibilities of such partners. Candidates must provide a copy of the management contract.	Management contract with CMO / EMO demonstrating that the applicant school's governing board retains full fiscal authority and control over operations. Signed conflict of interest forms must be on file for governing board members. Demonstrate segregation of duties to mitigate the risk of waste, fraud, and abuse. There are agreements or related party policies in place to mitigate the risk of waste, fraud, and abuse.
Evidence that the school provides a program of elementary and / or secondary education.	Enrollment plans / projections for new schools, current enrollment and projections for existing schools.

Appendix 2: Documentation required as part of RFA submission

1. School Project Application Narrative (maximum 25 pages)
2. Planned Enrollment and Demographics (existing enrollment and projections)
3. Compliance Check List of Certifications & Assurances (use form provided on SurveyMonkey apply)
4. CSP Project Budget (use google sheets template provided)
5. CSP Project Budget Narrative (1-3 pages)
6. Five Year School Operational Budget (a brief one-to-two-page narrative may accompany this, narrative is optional)
7. Three years of most recent Audit reports
8. Three years of most recent 990 forms
9. CSDE Filings for previous three years (must include performance data)
10. CSDE Certificate certifying compliance and renewal, or Charter Authorizer Contract
11. ESP or CMO/EMO Partner Contracts (or drafts)
12. Lease or Real Estate Agreements (or drafts)
13. Organization chart
14. Board & School Leader Bios/Resumes
15. Academic Data
16. Letter of Good Standing from Charter Authorizer (CSDE)
17. Self-Risk Assessment (complete the form on SurveyMonkey apply).
18. Enrollment and lottery policies
19. Transportation policies / procedures
20. Discipline policies
21. Artifacts from public meetings
22. Closure plans / Student transfer policies in case of school closure

Appendix 3 : Self-Risk Assessment Questions (this list is not exhaustive, this list may be revised and / or further documentation may be required in subsequent grant cycles, refer to Tab 3 Self-Risk Assessment in the Monitoring Rubric Sheet)

General Screening

1. New to State or Federal Grants: Is the organization new (within three years) to managing state or federal grant funds?

2. Suspension or Debarment: Is the organization suspended or debarred by the Federal Government?

3. Project History: Does the organization have a history of successfully managing similar projects?

4. IRS Reporting: Did the organization submit their recent annual IRS Form 990 (or related forms) on time?

Financial Management

1. Current Financial Policies: Does the organization have current financial policies and procedures (reporting, financial management, procurement etc.) approved by the Board of Directors?

2. Are the organization's financial management policies and procedures compliant with [CFR 200](#)?

3. Procedures to Identify Unallowable Cost: Are procedures established to identify unallowable costs under federal/state grant programs before the funds are committed or expended?

4. Internal Control Policy: Does the organization have internal control policies to separate financial duties and responsibilities - no one person controls cash receipts, disbursements, payroll and bank reconciliations?

5. Bookkeeping System: Does the organization have a computerized bookkeeping system?

6. Finance Leader: Does the organization have a new (within 12 months) finance Executive leader?

7. Net Assets: Does the organization have positive net assets or a positive fund balance?

8. Operating Deficit: Does the organization have an operating deficit or recently borrowed funds to cover current year expenses (expenses exceed revenues)?

9. Equipment & Real Property Management Procedures: Does the organization have federally compliant (CFR 200) equipment and real property management procedures?

10. Written Procedures: Does the organization have written procedures regarding the initiation, review, and approval of all non-payroll expenditures?

11. List of Personnel: Does the organization maintain and update the list of personnel who can authorize purchases and approve invoices (including limitations to their authority)?

12. Invoices Reviewed & Approved: Are all invoices reviewed and approved (i.e., signed or initialed) by an authorized person prior to payment?

13. Public Record: Does the organization have public reports of financial mismanagement?

Technology

1. Computer Systems Change: Does the organization have a new (within 12 months) Computer system to manage the CSP, or other grants, personnel, and students?

Data Collection

1. Update, Track, & Monitor Project Performance: Does the organization have specific staff assigned to update, track and monitor project specific performance metrics?

Reporting

1. Accounting System: Can the organizations accounting system provide complete, accurate, and timely reports to management on grant or contract expenditures and balances?

2. Project Status: Can the organization provide a real-time project status report that includes project objectives, performance measures, activities and budget?

3. Time & Effort: Can the organization provide monthly time and effort reports by objective?

4. CSDE reporting: When was the organization's charter granted / renewed?

5. CSDE reporting: How many years are left until charter renewal by CSDE?

Academic Performance

1. How do the school's Next Generation Accountability Measures compare to the state? To the host district?

2. If milestones and performance measures are not on target what does this mean for renewal of the school's charter contract / renewal?

3. If the school is not on track to achieve milestones and performance measures then what remedial plans are in place?

Outstanding Litigation

1. Does the school have any outstanding litigation?

2. Is the school aware of any potential litigation

Appendix 4: Programmatic and Fiscal Monitoring (this list is not exhaustive, more reporting and documentation may be required in subsequent grant cycles, further detail can be found on tab 4_Programmatic Compliance of the Monitoring Rubric Sheet)

Examples of documentation requested as part of the *programmatic* desk review (this is not an exhaustive list, refer to Tab 4_Programmatic Compliance in the Monitoring Rubric Sheet for more details):
- The schools meet federal and state definitions of a charter school
- Board-approved policies or procedures – conflict of interest, school closure and transfer of student records, enrollment and admissions policy (including lotteries and waitlist maintenance), document retention, personnel management, student discipline, etc.
- Key data points including enrollment, attendance, academic performance, student mobility, leadership and staff turnover, student discipline etc. (note: not all data points will necessarily be reviewed during each desk review)
- Authorizer monitoring and/or site visit reports
- Transportation policies and procedures
- Board meeting minutes and related materials (including performance dashboards)
- Evidence of adherence to proposal (including community and family engagement efforts, collaboration with educators and/or traditional public schools and districts, etc.)
- Academic or operational documents as requested.

Documentation requested as part of the *fiscal* desk review (this is not an exhaustive list, refer to Tab 5_Fiscal Compliance in the Monitoring Rubric Sheet for more details):
- Board-approved financial policies or procedures – procurement, travel reimbursement, cash management, allowability of costs, disposition of assets, etc. that are aligned with CFR 200
- Subgrantee approved budget and expenditures to date
- Verification that expenditures are allowable, allocable, and reasonable
- Invoices and other accounting documentation
- Inventory lists of items added with CSP grant funds
- GSCT-funded subcontractor or consultant contracts and invoices
- Monthly board-level financial reporting documents
- Monthly reimbursement packet to be uploaded onto Basecamp along with reimbursement request (details below)
- Prior to each subsequent fiscal year, subgrantees will submit an annual progress report to CTCSA delineating their progress against their performance agreement, and if necessary, explain adjustments to future plans to ensure all outcomes and goals are met.