# **North Carolina** 21<sup>st</sup> Century Community Learning Centers Program



### SUBGRANTEE MONITORING

## **Standard Operating Procedures**

#### **July 2020**



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#### **SECTION 1: GENERAL INFORMATION**

#### **Purpose of Standard Operating Procedures (SOPs)**

The North Carolina Department of Public Instruction (DPI) is required to monitor the quality and effectiveness of the programs operating with funds provided through the 21st Century Community Learning Centers (CCLC) program (Education Department General Administrative Regulations (EDGAR), 2 CFR § 200.331). DPI staff in the Federal Program Monitoring and Support Division (Division) conduct monitoring reviews to ensure compliance with federal and state requirements and verify the implementation of descriptions included within the approved application such as assurances and budgets. Monitoring not only serves to ensure compliance, but also provides a means to identify areas that require additional support and technical assistance.

Written standard operating procedures (SOPs) ensure that regularly recurring operations are carried out correctly and always in the same manner. SOPs offer step-by-step instructions that act as guidelines for employee work processes to control the quality and the consistency of outcomes. The purpose of this document is to describe standard procedures for 21<sup>st</sup> CCLC subgrantee monitoring. SOPs are reviewed annually and changes to procedures and policies are shared with subgrantees during their annual training and are available on the 21<sup>st</sup> CCLC website. DPI reserves the right to update or change the content of this manual as well as the 21<sup>st</sup> CCLC program or fiscal requirements, policies, and procedures at any time.

It is the goal of the Division to establish and maintain timelines for the monitoring process that are reasonable under normal operations. However, the Division recognizes that unforeseen circumstances may occur that require timelines to be modified in some cases. In those instances where timelines are modified, staff will receive approval from the Supervisor and document the justification for any modifications to the established schedule, process, or procedure.

This document is organized to provide Program Administrators (PAs) with specific resources and steps to complete the on-site monitoring process through three (3) specific phases: 1) Planning; 2) Fieldwork; and 3) Reporting. All templates and instruments are included in the Appendices section of this document.

#### **Background of the Program**

The 21<sup>st</sup> Century Community Learning Centers (CCLC) Program is authorized under Title IV, Part B, of the Elementary and Secondary Education Act (ESEA) of 1965 as amended by the Every Student Succeeds Act (ESSA) of 2015. Beginning with grants initially funded in the 2017-2018 school year, 21<sup>st</sup> CCLC programs must comply with the provisions outlined in ESSA. Additional information about ESSA is located <u>HERE</u>.

The U. S. Department of Education (USED) awards formula grants to the North Carolina Department of Public Instruction (DPI) which in turn make competitive grants available to eligible entities. Eligible entities include but are not limited to local education agencies (LEAs), non-profit agencies, city or county government agencies, community-based organizations (CBOs), faith-based organizations (FBOs),

institutions of higher education (IHEs), and for-profit corporations. Generally, a new competition is offered once every three (3) years. Please note that availability of grant funds for new competitions and continuation awards is contingent upon budget approval by the U.S. Congress each year.

Section 4204(a) of the ESSA defines Expanded Learning Programs (ELPs) as enrichment and academic activities that are included as part of a program that provides students at least 300 additional program hours before, during, or after the traditional school day. In addition, ELPs must supplement, but not supplant, regular school day requirements. States receiving 21<sup>st</sup> CCLC funds may, but are not required to, support ELP activities with the federal funds. At this time, the North Carolina 21<sup>st</sup> CCLC program does not include ELPs as defined under the ESSA in the competitive grant program.

Section 4204(j) of the ESSA describes that a state may, but is not required to, renew a subgrant provided under this part to an eligible entity, based on the eligible entity's performance during the preceding subgrant period. While North Carolina does consider subgrantee performance during the preceding year as a part of the continuation award during the three-year award period, North Carolina does not currently offer renewability as allowed under the ESSA.

#### **Purpose of the Grant**

The purpose of the 21<sup>st</sup> CCLC program is to provide federal funds to establish or expand community learning centers that operate during out-of-school hours with three specific purposes:

- Provide opportunities for academic enrichment, including providing tutorial services to help students (particularly students in high poverty areas and those who attend low-performing schools) meet state and local student performance standards in core academic subjects such as reading and mathematics.
- 2. Offer students a broad array of additional services, programs, and activities, such as: youth development activities; service learning; nutrition and health education; drug and violence prevention programs; counseling programs; arts, music, physical fitness and wellness programs; technology education programs; financial literacy programs; environmental literacy programs; mathematics, science, career and technical programs; internship or apprenticeship programs; and other ties to an in-demand industry sector or occupation for high school students that are designed to reinforce and complement the regular academic program of participating students.
- Offer families of students served by 21<sup>st</sup> CCLCs opportunities for active and meaningful engagement in their children's education, including opportunities for literacy and related educational development.

#### Resources

This document is not intended to be used in isolation of the legislation, regulations, and non-regulatory guidance published by the U.S. Department of Education (USED).

- <u>21<sup>st</sup> Century Community Learning Centers Legislation and Guidance</u>
- Education Department General Administrative Regulations (EDGAR)
- General Education Provisions Act (GEPA)

#### SECTION 2: TERMS USED IN THE SOP

To ensure a common language is established, terms used throughout the document to describe procedures are defined as follows:

Business Days – Business days will not include holidays and weekends.

**Comprehensive Continuous Improvement Plan (CCIP)** – CCIP is a web-based grants management system used by subgrantees to apply for federal funds. The system consists of a Planning Tool and a Funding Application. The Funding Application component includes a Related Documents section where subgrantees upload supporting documents as required for each federal grant.

**Comprehensive Program Monitoring Review (CPMR)** – A CPMR is a monitoring review that is conducted on-site at the organization location where program documentation is maintained. CPMRs focus on indicators across five (5) compliance strands. Many compliance indicators in a CPMR are related to program management and implementation.

**Expenditure Reporting and Cash Application (ERaCA)** – ERaCA is a web-based application used by non-LEA units to process expenditures and cash requests. The system gives non-LEA units the ability to: 1) submit expenditures; 2) verify submissions; 3) check funds requirement dates; 4) verify balances; and 5) download financial reports. ERaCA inquiries may be performed by Division staff as part of the monitoring process.

**Fiscal Agent** – Throughout this document, reference to "organization" or "subgrantee" applies to the fiscal agent for the 21st CCLC grant. It is the fiscal agent's responsibility to: 1) maintain accurate and updated contact information for all 21st CCLC sites with NCDPI; 2) ensure adherence to all assurances and certifications associated with the 21st CCLC grant; and 3) assume responsibility for the reconciliation of any audit exception or compliance finding, including as necessary, the repayment of 21st CCLC funds from a non-federal funding source. Failure to comply with federal, state or grant guidelines may lead to implementation of a corrective action plan, reduction of allocation, suspension of reimbursement, repayment of misused funds, or suspension or closure of program.

**Fiscal Monitoring Review (FMR)** – An FMR is a monitoring review that is conducted on-site at the organization location where fiscal documentation is maintained. FMRs focus on nine (9) indicators of fiscal compliance.

**Fiscal Monitor (FM)** - The FM is the primary individual within the Division that is responsible for completing the programmatic monitoring process.

**Monitoring Instrument** – A monitoring instrument is used by Program Administrators to conduct CPMRs and FMRs. The instrument is organized by specific state and federal compliance requirements.

**Monitoring Process** – Monitoring reviews are conducted in one of four (4) ways: 1) Comprehensive Program Monitoring Reviews (CPMRs); 2) Fiscal Monitoring Reviews (FMRs); 3) Desk Reviews (DRs); and 4) Program Quality Reviews (PQRs). The monitoring process in <u>Section 3</u> of this document refers to onsite reviews conducted as CPMRs and FMRs. Additional monitoring procedures are described in <u>Section</u>

#### <u>5</u>.

**Non-LEA** – Non-LEA refers to all subgrantees that are not local school administrative units, referred to as local educational agencies (LEAs). For the 21<sup>st</sup> CCLC grant, non-LEA organizations includes, but is not limited to, faith-based organizations (FBOs), community-based organizations (CBOs), local government organizations, nonprofit organizations, and for-profit organizations.

**Primary Contact** – The Primary Contact refers to the individual identified by the subgrantee in the Basic Program Information sheet that is uploaded into CCIP. The Primary Contact is responsible for all communications sent to and from DPI. For the monitoring process, this individual is the point of contact for organizing and conducting the review and is responsible for communicating notifications, document submission requirements, and reports with applicable 21<sup>st</sup> CCLC staff. The Primary Contact may be identified as the Fiscal Agent Chief Administrator, the Chief Finance Officer, the Program Director, or another individual within the subgrantee organization.

**Program Administrator (PA)** – The PA is the primary individual within the Division that is responsible for completing the programmatic monitoring process.

**Questioned Cost** – According to EDGAR 2 CFR § 200.84, "Questioned cost means a cost that is questioned by the auditor because of an audit finding: (a) Which resulted from a violation or possible violation of a statute, regulation, or the terms and conditions of a Federal award, including for funds used to match Federal funds; (b) Where the costs, at the time of the audit, are not supported by adequate documentation; or (c) Where the costs incurred appear unreasonable and do not reflect the actions a prudent person would take in the circumstances." For the purposes of these procedures, the term "auditor" also applies to fiscal monitoring staff. The identification of any questioned cost may result in suspension of the subgrantee's funds and repayment.

**Subgrantee** – Subgrantee refers to the organization that is the fiscal agent for the 21st CCLC grant. See description for Fiscal Agent above.

**Supervisor** – Supervisor refers to the DPI individual that completes the final approval of various parts of the monitoring process. Typically, the Supervisor is the Division Director, Assistant Director, or Section Chief.

**Suspension of Funds** – Suspending funds, sometimes referred to freezing funds, is the process of disabling the ERaCA account for an individual subgrantee. When accounts are temporarily disabled, subgrantees may not make reimbursement requests and draw down funds. Disabling the ERaCA account requires PAs to notify the Supervisor via email the reason the account should be disabled. The Supervisor reviews the request and emails a Fiscal Monitor to disable the account. Once a corrective action is completed, the account is enabled in ERaCA through the same process.

#### **SECTION 3: COMPREHENSIVE MONITORING PROCESS**

Monitoring reviews are conducted during the three-year cycle for each subgrantee. A monitoring schedule is developed by the PAs and submitted to the Section Chief, Assistant Director, and/or the Director for final approval. Approval of monitoring schedules is documented through emails.

For each organization's three-year grant cycle, monitoring is conducted as follows:

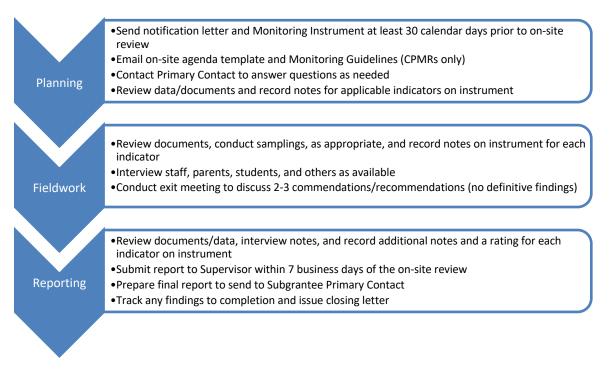
- Year 1 Program Quality Reviews and Fiscal Desk Reviews
- Year 2 Comprehensive Program Reviews and Fiscal Monitoring Reviews
- Year 3 CPMRs, FMRs, PQRs, and/or FDRs based on a risk assessment

#### **Overview**

The monitoring review process for each scheduled on-site review occurs in three phases:

- 1. Planning work performed prior to the on-site visit
- 2. Field Work work performed during the on-site review
- 3. Reporting work performed after the on-site review is completed

The following graphic provides a general overview of the steps completed in each phase of the process.



#### **General Roles and Responsibilities**

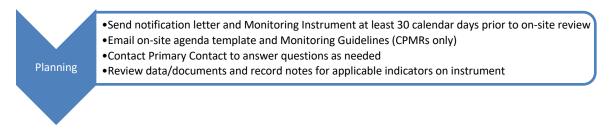
To ensure internal controls are maintained, the monitoring review process is conducted with a separation of duties performed by individual staff members.

Administrative Assistant – The Administrative Assistant is responsible for sending out all formal communications regarding the monitoring review. The Administrative Assistant proofreads Notifications and Cover Letters and ensures that correct letterhead is used. In addition, the Administrative Assistant is responsible for maintaining a tracking log of all parts of the process.

**Fiscal Monitor (FM)/Program Administrator (PA)** – A FM or PA is assigned to serve as lead monitor for each on-site or desk review scheduled for the fiscal year (e.g., July 1, 2020 to June 30, 2021). They are responsible for collecting current templates, reviewing data, providing informal communication with subgrantees, maintaining documentation, and adhering to established timelines to ensure that reviews are conducted as scheduled and reports are completed in a timely manner.

**Supervisor** – Supervisors have final approval on all monitoring schedules and activities. Supervisors are responsible for reviewing and approving all formal communications prior to sending to the Administrative Assistant for distribution. The Supervisor must periodically review the tracking log to determine if the monitoring process is conducted in a timely manner and in adherence to established timelines.

# NOTE: DPI reserves the right to conduct unannounced visits if significant risk is determined through external audits, public complaints, or non-compliance with data submission and reporting requirements



#### **Planning Phase**

To complete a monitoring review, the lead PA will need to gather the following for each type of monitoring:

#### <u>CPMRs</u>

- CPMR Notification Template (<u>Appendix A</u>)
- CPMR Instrument with Sample Documentation (Appendix C)
- CPMR Guidelines (<u>Appendix E</u>)
- CPMR Instrument Working Copy (<u>Appendix F</u>)
- Documentation maintained at the state level (e.g., Related Documents in CCIP)

#### <u>FMRs</u>

- FMR Notification Template (<u>Appendix B</u>)
- FMR Instrument (<u>Appendix D</u>)

Who	What	When
Program	• Updates the 1) Notification Letter and 2) Program	Send at least 5 days prior
Administrator	Information Sheet in SharePoint	to start of 30-day timeline
/ Fiscal	• Notifies Supervisor via email the letter is ready for	for subgrantee notification
Monitor	review	
Supervisor	Reviews Notification Letter and Program	Approve prior to the 30
	Information Sheet	days prior to scheduled
	Emails Approvals to Administrative Assistant	review
	<ul> <li>Documents dates in tracking log</li> </ul>	
Administrative	Emails Notification Letters and Monitoring	Send prior to the 30 days
Assistant	Instrument to Subgrantees	prior to scheduled review
	Place email notifications in SharePoint	
	Documents dates in tracking log	
Program	Sends follow-up email to subgrantee Primary	Within two weeks after
Administrator	Contact and provides an agenda template and the	notification is emailed
/ Fiscal	Monitoring Guidelines document (CPMRs only)	
Monitor		
Program	Utilizes the Monitoring Instrument Working Copy	During the 30-day period
Administrator	to review data/documentation available at the	prior to the review
/ Fiscal	state level and/or provided by subgrantee	
Monitor	Documents notes in the Monitoring Instrument	
	Working Copy	
Program	• Reviews the submission of subgrantee documents	5 days prior to the
Administrator	Documents notes in the Monitoring Instrument	beginning of the review
/ Fiscal	Working Copy	
Monitor	Develop interview questions for the review and	
	list additional items to request	
Program	Maintains copies of the documented process in	5 days prior to the
Administrator	SharePoint	beginning of the review
/ Fiscal	<ul> <li>Tracking form (see <u>Appendix S</u>)</li> </ul>	
Monitor	<ul> <li>Notification letter</li> </ul>	
	<ul> <li>Program Information Sheet</li> </ul>	

•Review documents, conduct samplings, as appropriate, and record notes on instrument for each indicator

•Interview staff, parents, students, and others as available

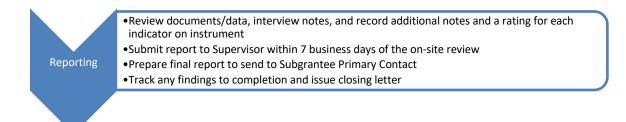
•Conduct exit meeting to discuss 2-3 commendations/recommendations (no definitive findings)

#### **Fieldwork Phase**

To complete the Fieldwork Phase, the lead PA or FM will need the following:

- Copy of CPMR/FMR Instrument Working Copy with current notes (see links to documents in the <u>Planning Phase</u> section)
- List of interview questions
- List of additional documents to request

Who	What	When	
Program Administrator / Fiscal Monitor	<ul> <li>Conducts on-site review at program locations for selected center(s):         <ul> <li>Additional document review</li> <li>Interviews with staff and others as appropriate</li> <li>Conduct samplings for applicable indicators (e.g., equipment inventory, contracts, etc.)</li> </ul> </li> <li>Documents results of review in the Monitoring Instrument Working Copy</li> <li>Conducts exit conference with an overview of commendations/concerns (NO specific Findings)</li> </ul>	During site visit	



#### **Reporting Phase**

To complete the reporting phase, the lead PA or FM will need to gather the following:

- Completed CPMR/FMR Instrument Working Copy
- CPMR Report (<u>Appendix G</u>) or FMR Report (<u>Appendix H</u>)
- Cover Letter CPMR Report with Findings (<u>Appendix I</u>) or FMR Report with Findings (<u>Appendix J</u>) OR
- Closing Letter No Findings or Findings Resolved (<u>Appendix K</u>)

Who	What	When
Program	Completes Monitoring Report with Final Ratings	Within 7 business days of
Administrator	and narrative for all indicators rated as Meets	the completed on-site
/ Fiscal	Requirements with Recommendations and	review unless granted an
Monitor	Findings.	extension by Supervisor

<b></b>		1
	Updates Cover or Closing Letter with contact	
	information, dates, etc. and saves in SharePoint	
	<ul> <li>Saves Monitoring Report in SharePoint and</li> </ul>	
	notifies the Supervisor via email that the report is	
	ready for review	
	Maintains copies of the documented process in	
	SharePoint	
	<ul> <li>Completed monitoring report</li> </ul>	
	<ul> <li>Completed monitoring instrument</li> </ul>	
	<ul> <li>Cover letter (with findings)</li> </ul>	
	<ul> <li>Closing letter (no findings or findings</li> </ul>	
	resolved)	
	<ul> <li>Finding response approval email</li> </ul>	
	Additional documents collected after the on-site	
	review, as applicable	
Supervisor	Reviews completed Monitoring Report and Cover	Within 7 business days of
	or Closing Letter	receipt of the report
	Emails PA if revisions are needed	
	OR	
	Notifies Administrative Assistant that report and	
	cover or closing letter are approved in SharePoint	
Administrative	Accesses approved Monitoring Reports and Cover	Within 7 business days of
Assistant	or Closing Letters in SharePoint	receipt of the report
	Sends out approved Monitoring Reports and Cover	
	or Closing Letter to Subgrantee Primary Contact	
	<ul> <li>Documents dates in the Tracking Log</li> </ul>	
	<ul> <li>Maintains copies of the documented process in</li> </ul>	
	SharePoint	
	<ul> <li>Final monitoring report</li> </ul>	
	<ul> <li>Cover letter (with findings)</li> </ul>	
	<ul> <li>Closing letter (no findings or findings</li> </ul>	
	resolved)	
	<ul> <li>Report Approval Email</li> </ul>	
	<ul> <li>Closing Email</li> </ul>	
	<ul> <li>Additional documents as applicable</li> </ul>	

#### **SECTION 4: RESOLUTION OF FINDINGS**

Once the Monitoring Review process is completed (i.e., Monitoring Report with Final Ratings is sent to subgrantee's Primary Contact), each PA or FM must work in collaboration with the subgrantee's Primary Contact to resolve all findings. Timelines are established to ensure that 1) subgrantees receive reports in a reasonable amount of time; and 2) corrective actions may be completed in as timely a manner as possible. *See Repayment of Funds section for findings related to a questioned cost.* 

• **Meets Requirements** – Reports issued with all indicators rated as Meets Requirements will be issued to the subgrantee with a cover letter that serves as the closing letter. No additional action is

required on the part of the PA, FM or the subgrantee.

- **Meets Requirements with Recommendations** Reports issued with no Findings, but with Recommendations will be issued to the subgrantee with a cover letter that serves as the closing letter. No additional action is required on the part of the PA, FM or the subgrantee.
- **Finding(s)** Reports issued with one or more Findings require a written response from the subgrantee as follows:
  - <u>CPMR Report</u> Subgrantees must respond in writing to each item marked as Finding(s) within thirty (30) business days of receipt of the report. The organization's response must demonstrate the required action has already been addressed by including supporting documentation with the written response.
  - <u>FMR Report</u> Subgrantees must respond in writing to each item marked as Finding(s) within ten (10) business days of receipt of the report. The organization's response must 1) demonstrate the required action has already been addressed by including supporting documentation with the response, or 2) describe a specific action plan for completing the required action with a detailed timeline and persons responsible.

The PA or FM that conducted the on-site must review all information and/or documentation to determine if compliance requirements have been met. Once all Findings have met compliance, a closing letter is issued to the subgrantee.

# NOTE: Subgrantee responses should reference the applicable indicators and be written in a separate document as the monitoring report is a PDF.

#### Subgrantee Responds Within Established Timeline

When responses to findings for CPMRs are received, the PA sends the email notification to subgrantee acknowledging the receipt of responses using <u>Appendix O</u>. The notification is used throughout the resolution process until all findings are resolved and a closing letter can be issued. The template will acknowledge the receipt of the response indicating one of the following:

- The data submitted sufficiently addresses the compliance concerns communicated in the report, and a closing letter will be emailed indicating the subgrantee's program is in good standing.
- Additional documentation is required. Each subgrantee must provide the additional requested documentation within <u>10</u> business days of receipt of email to demonstrate compliance and to avoid any possible punitive action against their program.

If the additional written responses and/or documentation provided by the subgrantee does not meet compliance within the established timeline, the PA should consult with the Supervisor to determine what additional actions may be required which may include, but is not limited to, implementation of a corrective action plan, voluntary reduction or termination of funds, suspension of reimbursement, or suspension or closure of program\*.

When responses to Findings for FMRs are received, the FM sends the appropriate follow-up letter.

#### Subgrantee Does Not Respond Within Established Timeline

Subgrantees that do not respond in writing within the established timeline will be subject to the immediate suspension of funds. The PA must notify the Supervisor that the written response has not been received to initiate the suspension of funds process. The Supervisor will notify the subgrantee via email that funds are suspended. See email notification for suspension of funds in <u>Appendix N</u>.

#### **Repayment of Funds**

If a fiscal monitoring review (FMR) identifies questioned costs (see <u>Section 2</u>) in excess of \$500 total, the subgrantee's funds are immediately suspended. If questioned costs are not sufficiently resolved within the established timeline (i.e. 10 business days for FMRs), the following steps are completed:

- 1. Letter of Repayment are issued to the subgrantee via email. The subgrantee must submit payment within 10 business days (see <u>Appendix L</u>).
- 2. If repayment is not received, a second Letter of Repayment is issued to the subgrantee via email and with an additional 30 business days to submit payment to DPI (see <u>Appendix L</u>).
- 3. If repayment is not received within 30 business days following the second letter, then DPI must contact the office of the Attorney General at the NC Department of Justice to determine the next steps which may include recovery of funds and/or permanent debarment or suspension from receiving federal funds.
- 4. When repayment is received, an acknowledgement letter is sent to the subgrantee (see <u>Appendix M</u>) and funds are made available.

#### \*NOTES

- If any subgrantee is unable to provide evidence to resolve issues of questioned costs, then funds must be repaid, regardless of the amount (i.e., less than \$500.00).
- DPI must follow procedural due process to terminate a grant and seek final approval from the State Board of Education.
- Appeals Process is located below:

In accordance with federal rules, NCDPI provides applicants or recipients with the opportunity for a hearing to appeal NCDPI's final action under an applicable federal program. *See* 34 C.F.R. § 76.401(a), 34 C.F.R. § 76.783 and 20 U.S.C. 1231b-2. Specifically, the applicant or recipient must allege that NCDPI violated State or Federal law, rules, regulations, or guidelines in:

- 1) disapproving or failing to approve its application or program in whole or part,
- 2) failing to provide funds in amounts in accord with the requirements of laws and regulations,
- 3) ordering, in accordance with a final State audit resolution determination, the repayment of misspent or misapplied Federal funds, or
- 4) terminating further assistance for an approved program.

No other grounds for appeal will be accepted or considered.

To request a hearing, the appellant must file a full and complete written appeal, including the issue(s) in dispute, the legal authority or other basis for the appeal position, and the remedy sought within 30 days of the NCDPI's action (e.g., notification of any action under 1 through 4 above). The

request must have an original signature of the authorized agent who signed the application, if available. If that individual is not available, the request must have the original signature of another individual who is authorized to sign official documents.

An original and two copies of the request for a hearing must be submitted by one of the following methods.

1. Certified mailed with a return receipt required (within 30 days based on the postmark) to:

#### Mailing Address:

Dr. LaTricia Townsend, Director Federal Program Monitoring and Support Division North Carolina Department of Public Instruction Mail Service Center 6307 Raleigh, NC 27699

2. Hand-delivered to:

#### Physical Address: Dr. LaTricia Townsend, Director Federal Program Monitoring and Support Division North Carolina Department of Public Instruction 301 N. Wilmington Street Raleigh, NC 27601

Please find the complete appeals process on the 21<sup>st</sup> CCLC website: <u>21st CCLC Appeals Process Link</u>

#### **SECTION 5: OTHER MONITORING PROCEDURES**

In addition to on-site reviews, DPI conducts other forms of monitoring throughout the year. Regardless of the type of monitoring conducted, a review that identifies questioned costs in excess of \$500.00 will result in the immediate suspension of the funds (see <u>Repayment of Funds</u>).

#### Reviews Documented in the Comprehensive Continuous Improvement Plan (CCIP)

Type of Review	Description	Timeline	Number
Budget	Initials budgets must be reviewed and	Review and	All subgrantees
Review/Approval	approved.	provide a	
		response to	
		subgrantee	
		within 10	
		business days of	
		receipt	
Amendment	Amendments to initial budgets must be	Review and	All subgrantees
Review/Approval	compared to the project narrative to	provide a	as submitted
	determine if amendments are reasonable	response to	
	and necessary for accomplishing the goals	subgrantee	
	of the project as approved.	within 10	
		business days of	
		receipt	

Document Uploads	Documents uploaded into CCIP must be reviewed for completion. CCIP documents include, but are not limited to the following: • Basic Program Information • Private Schools Consultation • Written Fiscal Procedures • Annual Program Evaluation • Contracts • Conflict of Interest Agreement • Field Trips • Programmatic Amendments	Initial review within 10 business days of receipt	All subgrantees

#### **Desk Reviews**

Desk Reviews are conducted at DPI each year based on documentation submitted by each organization to the Division to support program and fiscal compliance. For 21<sup>st</sup> CCLC programs, the review includes, but is not limited to, an assessment of the approved project, budgets and amendments, and documents uploaded into the 21<sup>st</sup> CCLC Related Documents section of the Comprehensive Continuous Improvement Plan (CCIP) and ERaCA drawdowns with supporting documents. Approvals and requests for revisions of budgets, amendments, and uploaded Related Documents are documented in CCIP.

#### **Reviews Documented through Direct Communication**

- Expenditure vs. Budget Desk Reviews are conducted by DPI staff to compare approved budgets to expenditure reports. Expenditures are compared to budgets to ensure that expenditures of any approved budget line item have been included in the approved budget/amendment with the corresponding documentation timeline. After the review is completed, the organization may receive an email that the subgrantee needs to submit a budget amendment copying the assigned PA, if applicable (<u>Appendix P</u>). The process is documented through emails and amendment forms submitted in the Related Documents section of CCIP to demonstrate issues are resolved.
- 2. For organizations utilizing the Expenditure Reporting and Cash Application (ERaCA) system, the Desk Review includes a sampling of supporting documents submitted to DPI on a monthly basis reconciled to cash drawdowns. All non-LEA organizations must submit supporting documentation (i.e., proof of payment) for reimbursement requests within ten (10) business days (not including holidays and weekends) of the cash request submission in ERaCA. All documents are submitted to the Administrative Assistant via email and maintained in SharePoint.

 Desk reviews for organizations utilizing the Budget and Amendment System (BAAS), must submit at the request of the fiscal monitor via email, documentation (i.e. proof of payment) to support those totals reported in BAAS for reimbursement of 21<sup>st</sup> CCLC expenses.

The sampling of reconciliations is performed by Fiscal Monitors and/or Program Administrators. The ultimate purpose of these submissions is to verify that there is proof of purchase for the requested reimbursement. If issues are identified through the review process, the FM will email the subgrantee and request additional information be provided (<u>Appendix Q</u>). The process is documented through emails until issues are resolved.

Type of Review	Description	Timeline	Number
Expenditure vs.	Expenditure reports must be compared to	Response provided	All subgrantees
Budget	approved budgets to ensure that	to subgrantees	for each PAs
	expenditures of any approved budget line	within 10 business	assigned
	item have been included in the approved budget/amendment.	days of the review	programs
ERaCA / BAAS	ERaCA and BAAS reconciliations for	Monthly response	Subgrantees in
Reconciliations	subgrantees are performed to compare	provided to	the 2 <sup>nd</sup> year of the
	cash requests for a specific period to	subgrantees within	3-year grant cycle
	document proof of payment.	5 business days of	
		the completion of	
	To review the Checklist of Allowable Cost	the review	
	for Federal Funds, refer to <u>Appendix R</u> .	(Beginning in January	
		and ending in June	
		each cycle year)	

\* NOTE: DPI reserves the right to conduct additional ERaCA Reconciliations if significant risk is determined through external audits, public complaints, or non-compliance with data submission and reporting requirements.

#### **Program Quality Reviews (PQRs)**

PQRs are conducted based on a risk assessment. The risk assessment includes, but is not limited to, prior observations/reports, available desk review data, and/or public complaints. PQRs are intended to provide technical assistance and to promote program quality. PA's conducting PQRs must utilize the PQR template that relates to the following strands:

- I. Program Management
- II. Program Implementation
- III. Family and Community Engagement
- IV. Federal/State/Local Statute
- V. Fiscal Management

PQRs are conducted on-site or via desk based on a risk assessment; however, written feedback is provided as "Commendations," "Concerns," and "Recommendations; no findings". The number of

strands determined by the PA for review include but are not limited to the risk assessment, previous findings and/or recommendations. Subgrantees are not required to provide a written response to PQRs. For PQR templates, see <u>Appendix T</u>.

#### North Carolina Office of the State Auditor

The Office of the State Auditor (OSA) performs an array of work, including financial statement audits, financial related audits, performance audits, information technology audits, and investigative reports. OSA examine all facets of state government, including education, health, transportation, computer systems, regulatory processes, and public safety. OSA conduct special studies as requested by the Legislature and audit federal grant programs to ensure North Carolina can continue to receive federal money. Investigations are conducted pursuant to *North Carolina General Statute §147-64.6.* Article 5A, Chapter 147 of the North Carolina General Statutes, gives the Auditor broad powers to examine all books, records, files, papers, documents, and financial affairs of every state agency and any organization that receives public funding. The Auditor also has the power to summon people to produce records and to answer questions under oath.

If a Fiscal Monitor or Program Administrator receive a request to produce records or answer questions about an 21<sup>st</sup> CCLC organization who receives public funding, the following procedures should be followed:

- 1) Notify the immediate supervisor of the OSA request.
- Document the OSA request on the Fiscal Risk Assessment and add the 21<sup>st</sup> CCLC organization to the Fiscal Monitoring Calendar. (Any 21<sup>st</sup> CCLC organization in which there is an open investigation by OSA will result in that 21<sup>st</sup> CCLC organization receiving a fiscal monitoring)
- 3) Provide OSA requested information in a timely manner.
- 4) Notify the immediate supervisor if and when an official report from OSA is issued

# SECTION 6: APPENDICES

#### Appendix A: Comprehensive Program Monitoring Review (CPMR) Notification Template

TO[NAME], Program Director<br/>[ORGANIZATION NAME]<br/>[UNIT/COHORT]FROM[NAME], Director<br/>Federal Program Monitoring and Support Division<br/>[NAME], Section Chief<br/>Federal Program Monitoring and Support Division

**DATE** [MONTH DATE, YEAR]

#### 21st Century Community Learning Centers (21st CCLC) Comprehensive Program Monitoring Review

Please be informed that a 21st CCLC Comprehensive Program Monitoring Review (CPMR) is scheduled for [DATE]. A North Carolina Department of Public Instruction (DPI) Program Administrator (PA) will follow-up with you with additional information to help you prepare for the Comprehensive Program Monitoring Review.

The process begins with an offsite review of documentation that supports compliance with applicable federal program requirements. Documentation for this part of the review must be submitted electronically no later than 5:00 p.m. on [DAY], [MONTH DATE, YEAR]. The onsite portion of the review will take place on [DAY], [MONTH DATE, YEAR]. Site visits will be conducted during the afternoon when the PA will observe staff prepare for the transition to afterschool programming. Once the students have arrived, the PA will observe the daily programming and instruction. The visits will also involve interviews with some or all the following stakeholder groups (as determined by your PA): staff, students, principals and teachers of feeder schools (as available), parents (as available), and may include volunteers, community partners, or other program supporters available the day of the visit. The CPMR will conclude with an exit conference with the Program Director and / or other appropriate program designees to discuss preliminary observations. A final report will be issued to the 21st CCLC Program within thirty (30) days of the exit conference.

The Lead PA for your review is [NAME OF PA] and can be contacted at [EMAIL ADDRESS] and via phone at [PHONE NUMBER]. All communication regarding your 21st CCLC CPMR should be referred to your Lead PA who will contact you to finalize the details of the monitoring review. Thank you for your support in meeting the needs of children served by the 21st CCLC Program.

#### [AUTHOR: TYPIST INITIALS]

c: [NAME], NCDPI Lead Program Administrator

#### Appendix B: Fiscal Monitoring Review (FMR) Notification Template

- TO [NAME], Program Director [ORGANIZATION NAME] [UNIT/COHORT]
- FROM [NAME], Director Federal Program Monitoring and Support Division

[NAME], Section Chief Federal Program Monitoring and Support Division

#### **DATE** [MONTH DATE, YEAR]

# 21<sup>ST</sup> CENTURY COMMUNITY LEARNING CENTERS (21<sup>st</sup> CCLC) FISCAL MONITORING REVIEW

This is written to inform you that a Fiscal Monitoring Review (FMR) is scheduled for your afterschool program(s) funded with the 21<sup>st</sup> Century Community Learning Centers (21<sup>st</sup> CCLC) grant for the week of [DATE]. The onsite portion of the FMR will be on [DAY], [MONTH DATE, YEAR]. Within the next week, a North Carolina Department of Public Instruction (NCDPI) Fiscal Monitor (FM) will contact you to discuss further logistics for the on-site review.

During the on-site review process, NCDPI staff will review source documentation and test the subgrantee's fiscal procedures through a sampling of the entire fiscal year in areas such as payroll, time and effort reporting, expenditure accounting, inventory, and adherence to indirect cost rates (non-LEAs only). In preparation for the upcoming on-site compliance monitoring for selected 21<sup>st</sup> CCLC programs, NCDPI is requesting that documentation (receipts, payroll records, timesheets, contracts, etc.), as well as any inventory, be prepared and readily available to compliance monitoring personnel for review. The on-site review will be completed within one business day; therefore, incomplete documentation may result in compliance findings and potential repayment of funds.

The Lead Fiscal Monitor (FM) for your review is [NAME OF PA] and can be contacted at [EMAIL ADDRESS]. All communication regarding your FMR should be referred to your Lead FM. Thank you for your support in meeting the needs of children served by your 21<sup>st</sup> CCLC Program(s).

c: NAME, 21<sup>st</sup> CCLC Program Director [NAME], NCDPI Fiscal Monitor NAME, NCDPI Program Administrator

#### **Appendix C: CPMR Instrument with Sample Documentation**

Program Name:	Unit/Cohort Number:	Year of Funding:
Date of Review:	Total Number Students:	Total Number Sites:
Program Administrator Completing R	leview:	

The State Educational Agency (SEA) is required to monitor the quality and effectiveness of the programs operating with funds provided through 21st Century Community Learning Centers (21st CCLC) grant program (EDGAR, 2 CFR § 200.331). Monitoring of the 21st CCLC subgrantees focuses on indicators across five (5) compliance strands: Program Management; Program Implementation; Family Engagement; Federal, State and Local Statutes; and Fiscal Management.

Program Administrators use the instrument to review documentation and conduct interviews compared to the data and narrative descriptions submitted in the approved project. Each indicator within a compliance strand is rated as follows:

Meets Requirements	Meets Requirements with Recommendations	Findings	NA – Not Applicable
Compliance indicator is 100% met and supported by all required evidence(s).	Basic compliance requirements are met; recommendations are provided for improvement.	Evidence or lack of evidence show compliance indicator has not been met.	Accountability standard is not applicable.
All required documents are provided and support compliance.		Incomplete or lack of required documentation.	
Interviews support documentation, processes, and implementation.		Interviews lack understanding or support of documentation, processes, and implementation.	
Compliance is consistent at program level and sites sampled.		Compliance is inconsistent at program level and sites sampled.	

Following the review, a report with all ratings will be provided to the primary contact for the 21st CCLC program subgrantee. The subgrantee must respond in writing to each item marked as Finding within thirty (30) business days of receipt of the report. The subgrantee's response must demonstrate the required action has been sufficiently addressed by including supporting documentation with the written response.

NOTE: Because the methodology of the 21st CCLC monitoring includes sampling, the monitoring process cannot produce an all-inclusive assessment of items in this instrument. The 21<sup>st</sup> CCLC program is responsible for operating its categorical programs in compliance with all applicable laws and regulations.

#### STRAND I. PROGRAM MANAGEMENT

21<sup>st</sup> CCLC programs must be managed as described in the approved project during non-school hours or periods when school is not in session (such as before and after school or during summer recess). (*Section 4201(b)(1)(A); Section 4204(b)(2)*)

Indicator	Description	Sample Evidences	Notes	Rating
1.1	Program targets students who primarily attend schools eligible for schoolwide programs under Section 1114.	Program amendments (if feeder school changes have occurred) Roster of enrolled students indicating feeder school Sample of daily attendance records for each site		
1.2	Program consistently serves projected number of students and/or can demonstrate recruitment efforts to maintain or increase the number of students served according to the description in the approved project.	Enrollment and daily attendance records for each site Program Attendance Update form Recruitment plan/marketing materials Verification of total average daily attendance (ADA) at time of visit		
1.3	Program operates outside of the regular school day for a minimum of 12 hours per week at each site.	Feeder school(s) calendar(s)/hours of school day Programmatic schedule with student contact days/hours of operation		
1.4	Program is adequately staffed as described in the project application.	Documented hiring procedures Job descriptions of key personnel Organization chart		
1.5	Program conducts staff training on written policies and procedures.	Samples of written communication with staff members Schedule of staff training with example materials, sign-in-sheets, minutes of meetings Staff handbook		
1.6	Program maintains ongoing communication and collaboration with feeder schools.	Samples of communications (e.g., memos, letters, emails, etc.) with feeder schools Schedule of communication with feeder schools for each site		
1.7	Program disseminates information about the community learning center (including its location) to the community in a manner that is understandable and accessible.	Evidence of sustainability plan implementation as described in the approved project (e.g., records of matching contributions, letters of support, etc.)		

		Samples of communication with stakeholders (e.g., brochures, flyers, social media examples, etc.)	
1.8	Program implements a data collection plan and timeline that focuses on student attendance, at least one GPRA measure, and use of data for improvement and annual reporting.	Data collection schedule and persons identified responsible to ensure data is available for timely improvement and annual reporting Program Assessment Summary Samples of data collections (e.g., school attendance, disciplinary referrals, surveys, NC CAP Self-Assessment, etc.)	
1.9	Program attendance records are maintained daily at each program site.	Samples of daily attendance records at each site	
1.10	Program adheres to written policies and procedures for attendance data entry into the Attendance Module of 21DC.	Evidence of staff implementation of written policies/procedures Evidence of timely completion of required reporting Written policies/procedures	
Comme	nts:		

#### STRAND II. PROGRAM IMPLEMENTATION

21<sup>st</sup> CCLC programs must use award funds to offer students a broad array of services and activities that are designed to reinforce and complement the regular academics of participating students described in the grant. (*Section 4201(a)(2); Section 4204(b)(2)*)

Indicator	Description	Sample Evidences	Notes	Rating
2.1	Program offers student activities that are 1) focused on reading/language arts and mathematics; and 2) are aligned to the NC Standard Course of Study (NCSOS).	Evidence of alignment to NCSOS (e.g., listed goals, objectives, etc. within lesson planning) Samples of daily program schedules for each site Samples of lesson plans Samples of student materials		
2.2	Program offers students a broad array of additional services, programs, and activities.	Documented activities as described in the approved project (e.g., sample lesson		

2.3	Program uses a variety of strategies and/or activities to address various learning interests, grade levels, and abilities.	plans, materials, field trip follow- up activities, etc.) Samples of daily program schedules for each site Samples of lesson plans and/or staff training materials reflecting instructional strategies	
2.4	Program uses effective strategies for student safety and engagement during transition times.	Samples of transition times within daily schedules	
2.5	Program monitors student progress to ensure that activities are expected to improve student academic achievement as well as overall student success.	Samples of data collections on student progress (e.g., assessments, work samples, teacher feedback, etc.) Sample progress reports provided to parents and/or feeder schools	
2.6	Program offers professional development for staff, including volunteers, that is aligned to specific program goals and priorities.	Agendas, sign-in sheets, materials from learning opportunities for staff Sample evaluations of professional learning activities Written professional learning plans Yearly schedule of professional learning opportunities	
2.7	Program supports staff to ensure that appropriately qualified staff, including volunteers are more likely to continue serving the program effectively.	Samples of staff evaluation/feedback communication regarding performance Written evaluation plans	
Comme			

#### STRAND III. FAMILY ENGAGEMENT

21<sup>st</sup> CCLC programs must offer families of students served by community learning centers opportunities for active and meaningful engagement in their children's education, including opportunities for literacy and related educational development. (*Section 4201(a)(3)*)

Indicator Descript	on Sample Evidences	Notes	Rating
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3.1	Program maintains a communication plan for reaching out to and engaging families of the students to be served.	Evidence of communications with families (e.g., flyers, handbooks, newsletters, progress reports, etc.) aligned to description in approved project for each site Written family communication plan	
3.2	Program involves parents in the planning of program activities, as appropriate.	Samples of parent surveys Samples of parent meetings for parent input (e.g., agendas, sign-in sheets, etc.)	
3.3	Program offers activities for family engagement around support for students' academic needs.	Agendas, sign-in sheets, materials for activities Evaluations of family engagement activities Schedule of family engagement activities for each site	
3.4	Program offers activities for families including opportunities for literacy and related educational development.	Agendas, sign-in sheets, materials for activities Evaluations of family engagement activities Schedule of family engagement activities for each site	
3.5	Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable.	Samples of communications targeting non-English speaking and/or illiterate parents Written communication procedures	
Comme	nts:	· · · · · ·	

#### STRAND IV: FEDERAL, STATE, AND LOCAL STATUTES

21<sup>st</sup> CCLC programs must adhere to all applicable federal, state, and local health, safety, and civil rights laws. (Section 4204(b)(2)(N); Section 4204(c); Section 8501(a)-(d))

Indicator	Description	Sample Evidences	Notes	Rating
4.1	Program conducts criminal background	Samples of dated background check results		
	checks for all staff, including volunteers,	for staff and/or volunteers, as applicable		
	prior to working with students.	(10% of all staff or 5 whichever is greater)		

		Statement of assurance, if LEA, for ongoing background checks from human resources office	
4.2	Program adheres to consultation requirements with private school officials prior to and during program implementation.	Agendas, sign-in sheets, minutes of all consultation meetings (i.e., pre-award, post- award, and during program implementation for participating private schools) Evidence of communication with private school officials after grant is awarded Evidence of ongoing communication with private school officials during the implementation of the program Evidence of communication with private school officials prior to grant being awarded (e.g., Private Schools Consultation form, certified mail receipts, emails, etc.) List of private schools operating in the feeder school areas of the program	
4.3	Program implements policies/procedures for expectations for student conduct and disciplinary practices.	Samples of written policies/procedures communicated to staff, students, and parents	
4.4	Program implements procedures to ensure student and staff safety.	Schedule of safety drills conducted (e.g., fire, adverse weather, etc.) Written emergency preparedness policy/plan (if LEA, plan must specifically address the 21 <sup>st</sup> CCLC program) Written adverse weather policy/plan	
4.5	Program implements policies/procedures to ensure safe usage of the Internet, as applicable.	Samples of Internet usage consent forms for students under the age of 13, if applicable Written Internet usage policies/procedures	
4.6	Program takes place in a safe and easily accessible facility.	Evidence of accessibility to persons with disabilities Evidence of regular facility maintenance (e.g., fire inspection reports, building inspections, etc.)	
4.7	Program ensures that students travel safely to and from the center and home, if applicable.	21 <sup>st</sup> CCLC program-specific transportation policy/procedures Daily drop-off/pick-up schedules for each site	

	Evidence of student emergency list	
	availability on buses/vans	
	Specific transportation/vehicle information:	
	Copies of bus routes	
	Copy of charter bus license and	
	safety inspection	
	Copies of vehicle maintenance and	
	inspection reports	
	List of approved buses with bus	
	numbers and location	
	Transportation Activity logs	
Comments:		

#### STRAND V. FISCAL MANAGEMENT

# 21<sup>st</sup> CCLC programs use funds consistent with descriptions in the approved project, State guidelines and provisions of the Education Department General Administrative Regulations (EDGAR). (2 CFR §200; Section 4204(b)(2)(N))

Indicator	Description	Sample Evidences	Notes	Rating
5.1	Program has written procedures for	Written procedures include:		
	financial management in accordance with	Allowability		
	applicable provisions of 2 CFR §200.	Cash management		
		Compensation		
		Conflict of interest		
		Equipment management		
		Procurement		
		Segregation of duties		
		Travel		
5.2	Program provides staff training on written	Evidence of training (e.g., agendas, sign-in		
	procedures for financial management.	sheets, minutes, materials, etc.)		
5.3	Program maintains an inventory of	Equipment inventory compared to approved		
	equipment purchased with grant funds.	budget		
		Evidence that disposition procedures are		
		documented and maintained		
		Review of equipment matched to inventory		
		(10% of all equipment or 5 whichever is		

		greater; if fewer than 5 equipment purchases, all purchases reviewed)	
5.4	Program maintains procurement procedures for services and goods purchased with grant funds to avoid potential conflicts of interest.	Evidence that procurement methods are appropriate for purchase amount thresholds Evidence that no potential or actual conflict of interest exists for purchases with grant funds Review of one drawdown compared to: Approved budget and/or budget amendments Samples of proof of purchase demonstrating costs are reasonable and necessary (e.g., paid receipts, cancelled checks, etc.)	
5.5	Program maintains contracts with eligible vendors that have relevant professional qualifications and a taxpayer ID for the business.	Evidence that all contracts have been uploaded into CCIP Evidence that vendors are not debarred or suspended Evidence that vendors are not program employees Evidence that contracts contain clear specific language regarding vendor services or goods Samples of contracts compared to invoices If applicable, all contracts for student transportation compared to invoices: Dates of transportation From/to destination for each day Rate per mile as reflected in the contract Number of students transported Vehicle license plate number Total number of miles for the billing period	
5.6	Program maintains compensation procedures for employees paid with grant funds to ensure that salary paid is commensurate with effort worked on the grant.	Evidence of 21 <sup>st</sup> CCLC staff employment schedules outside of the 21 <sup>st</sup> CCLC program Evidence of other federal or state grants received by the subgrantee Evidence that total salaries and employer taxes for all employees for the 21 <sup>st</sup> CCLC	

and not supplant, other Federal, State, and local public funds expended to provide 21stfunds used for the same purpose as 21st CCLC grants (e.g., Extended Learning and Integrated Student Support CompetitiveCCLC programs and other similarIntegrated Student Support Competitive	5.7	Program uses grant funds to supplement,	Personnel Activity Reports (PARs) prepared monthly and dated/signed by employee and supervisor Semi-annual certifications dated/signed by employee and supervisor Evidence of other federal or state grant	
CCLC programs and other similar Integrated Student Support Competitive	6	and not supplant, other Federal, State, and	funds used for the same purpose as 21 <sup>st</sup>	
			• · · ·	
programs. Grant Program)		programs.	Grant Program)	

I hereby certify that I have no personal interest or conflict, either in fact or in appearance, that would compromise my ability to conduct an independent review.

(Signature of Program Administrator Completing Review)

(Date)

#### **Appendix D: FMR Instrument**

Program Name:	Unit/Cohort Number:	Year of Funding:				
Date of Review:	Total Number Students:	Total Number Sites:				
Program Administrator Completing Review:						

The State Educational Agency (SEA) is required to monitor the quality and effectiveness of the programs operating with funds provided through 21st Century Community Learning Centers (21st CCLC) grant program (EDGAR, 2 CFR § 200.331). Fiscal monitoring of the 21st CCLC subgrantees focuses on fiscal compliance indicators to determine if the subgrantee's financial management systems provides for effective control over and accountability for grant funds, property, and other assets and ensure they are used solely for authorized purposes. An additional indicator for Indirect Cost is reviewed for non-LEA units.

Fiscal Monitors use the instrument to review documentation and conduct interviews. Each indicator is rated as follows:

Meets Requirements	Meets Requirements with Recommendations	Findings	NA – Not Applicable
Compliance indicator is 100% met and supported by all required evidence(s).	Basic compliance requirements are met; recommendations are provided for	Evidence or lack of evidence show compliance indicator has not been met.	Accountability standard is not applicable.
All Required documents are provided and support compliance.	improvement.	Incomplete or lack of required documentation.	
Interviews support documentation, processes, and implementation.		Interviews lack understanding or support of documentation, processes, and implementation.	
Compliance is consistent at program level and sites sampled.		Compliance is inconsistent at program level and sites sampled.	

Following the review, a report with all ratings will be provided to the primary contact for the 21st CCLC program subgrantee (fiscal agent). The subgrantee must respond in writing to each item marked as Finding within ten (10) business days of receipt of the report. The subgrantee's response must 1) demonstrate the required action has already been addressed by including supporting documentation with the response, or 2) describe a specific action plan for completing the required action with a detailed timeline and persons responsible.

NOTE: Because the methodology of the 21st CCLC monitoring includes sampling, the monitoring process cannot produce an all-inclusive assessment of items in this instrument. The 21<sup>st</sup> CCLC program is responsible for operating its categorical programs in compliance with all applicable laws and regulations.

Ind	licator	Evidences Reviewed	Notes	Rating
1.	OVERARCHING: Fiscal Management Systems			
sys acc oth for	the program's financial management tems provide for effective control over and countability for grant funds, property, and her assets and ensure they are used solely authorized purposes? Procedures (2 CFR Parts 200.403-405)			
•	Review the grantee procedures insuring all costs are reasonable and necessary, allocable, properly documented, consistent with grant programs, not used for cost-sharing, and legal under local, state and federal laws.			
3.	General Procurement Standards (2 CFR Parts 200.318 and 200.319)			
•	Sample/document the grantee procurement procedures to include, but not necessarily limited to, rationale for the method of procurement, selection of contract type, contractor selection/rejection, basis for contract price. (Sample of procurement).			
•	Review contracts including those for transportation, parental involvement, bookkeeping, etc. (Any charge with a .3xx account code.) The contract should be reviewed against the invoices submitted for payment.			
•	Compare the entity's organization chart with vendor contracts to ensure that no potential conflict of interest exists.			
4.	Payroll			
cor	e all employees involved in the project npleting required payroll certification? (A st objective is a specific grant award.)	See Payroll testing tab		

<ul> <li>An employee who works on a single cost objective must certify at least semi- annually the percentage of time he / she works on the activity. (DPI requires timesheets with signatures and / or an electronic attestation statement for all employees / contractors of the grant with management approval.)</li> </ul>		
<ul> <li>An employee who works on separate funding codes or multiple cost objectives must certify at least monthly coinciding with one or more pay periods the percentage of time he/she works on the activity.</li> </ul>		
<ul> <li>Employees indicates on timesheets that work is performed solely when school is not in session and only when students are being served (i.e., no paid holidays when the program is not serving students).</li> </ul>		
<ul> <li>All job descriptions describe duties and responsibilities that are reflected in the distribution of wage and appear to be of benefit to the grant.</li> </ul>		
5. Budget		
Does the subgrantee receive written approval for all budgets and/or amendments prior to requesting cash reimbursement for costs?		
6. Equipment		
Are property records maintained for all equipment purchased with grant funds?		
<ul> <li>All technology costs or equipment expenses greater than \$500.00 have received pre-approval from DPI (and inventoried).</li> </ul>		
<ul> <li>The location of all equipment purchased with 21<sup>st</sup> CCLC funds is known and can be identified as requested.</li> </ul>		
• An inventory of equipment purchased with grant funds is conducted once every 1-2		

years and reconciled with property records.		
7. Transactions		
Does the subgrantee maintain appropriate documentation to support the transactions made with grant funds?	See Expenditure Testing Tab	
• Documentation includes check stubs, requisitions (if required), timesheets, and invoices.		
<ul> <li>Proof of Payment includes cancelled checks (front/back), bank statements, credit/debit card statements.</li> </ul>		
• General ledger coding associated with the transaction should be readily available and should be matched to the budget.		
<ul> <li>Appropriate approving signatures/initials, date and account codes are evident on all documents.</li> </ul>		
<ul> <li>If the organization has more than one operating program, funds in support of the identified program are used only for that program.</li> </ul>		
Gas receipts include vehicle numbers or license plates, as well as appropriate approving signatures/initials and date.		
8. General (NC DPI Fiscal and Program Guidance)		
<ul> <li>Grant funds must only be used to supplement, not supplant, any federal, state or local dollars available to support activities allowable under the 21st CCLC program.</li> </ul>		
<ul> <li>Guidelines allow student incentives with no intrinsic value (i.e., less than \$25, school supply-type items). Expenses must be in the budget.</li> </ul>		
• Staff and parental meetings/training that offered snacks and/or meals are documented with copies of sign-in forms and agendas for the event.		

•	Leases (if applicable) do not exceed one year.			
9.				
_	ve financial findings or weaknesses been			
	identified during previous surveys? If yes,			
	re deficiencies corrected?			

I hereby certify that I have no personal interest or conflict, either in fact or in appearance, that would compromise my ability to conduct an independent review.

(Signature of Program Administrator Completing Review)

(Date)

#### **Appendix E: CPMR Guidelines**

#### Guidelines for the Federal Program Monitoring Process [PROGRAM NAME (UNIT NUMBER) GRANT YEAR]

#### Introduction

These *Guidelines* are intended to help your program staff prepare for the North Carolina Department of Public Instruction (DPI) 21<sup>st</sup> Century Community Learning Centers (CCLC) Comprehensive Federal Monitoring Process (CPMR). The three sections that follow reflect the main parts of the process:

- 1 Online Document Review
- 2 21<sup>st</sup> CCLC Program Site Visit
- 3 Interviews and Exit Conference

#### 1 - Online Document Review

The requested documents are described in the *Comprehensive Program Monitoring Review (CPMR) Instrument,* which is organized by 5 compliance strands, based on federal law.

- Please share the documents with your Lead Program Administrator (PA) *electronically*, using a platform of your choice. Many 21<sup>st</sup> CCLC programs use Google Drive, Drop Box, or OneDrive. All documents must be available for review by <u>Friday</u>, <u>November 8, 2019 at 5:00</u>
   <u>PM</u>. <u>IMPORTANT</u>: The ratings of the applicable compliance strands and the monitoring report will be based on documents that are submitted by <u>the due date</u> or those that are already available on your program's webpages or in the CCIP grant management tool. <u>Late documents</u> <u>cannot be accepted</u>. Please contact your Lead PA if you have any questions about the documents needed for any of the strands.
- 2) Please organize the folders by <u>compliance strand number</u>, creating a main folder that includes the name of your program (e.g., "BCDI'G's 21<sup>st</sup> CCLC Cohort 12"). Your program name will help distinguish your folder from other 21<sup>st</sup> CCLC programs who follow the same protocols. Within that folder, simply create one folder for each compliance strand number. The folder names should be in numerical order and should include the title of each strand (e.g., Strand III. Family and Community Engagement). Within each Strand folder, it is also beneficial to create subfolders by the indicators for each strand so documentation for each indicator is easily accessible. Drop the relevant document(s) into each sub-folder.
- 3) Lead PAs will feel obligated to open and examine all documents provided. Therefore, when adding documents to the folders, please provide a distinct, concise and manageable selection for the given strand. In other words, please do not provide a folder full of any and all documents that relate to the activities in the strand; only provide enough to illustrate compliance with the strand. If you have any questions about this as you are collecting documents, please let your Lead PA know.

- 4) If one document satisfies more than one compliance strand, please upload it into all applicable folders. This may seem redundant, but it makes it easier for you and DPI staff to keep track of documents shared and previously reviewed.
- 5) For many of the compliance strands/indicators, the *CPMR Instrument* provides multiple examples of types of possible evidence that could demonstrate compliance. Please note <u>you do</u> not have to supply every possible type of item listed for any given indicator. DPI staff will look for evidence of a practice.
- 6) Please note you do not need to provide an exhaustive set of a particular kind of document. For example, to demonstrate that a particular group has met 12 times during the year, simply supply the artifacts related to one or two of those meetings, as long as those artifacts reflect what is <u>described in the given indicator</u>. You would not need to include artifacts from all the other meetings. However, you should include a calendar or schedule showing the other meeting dates, to give a comprehensive view.
- 7) Items can be provided in the following formats: PDFs, Word files, TXT files, Excel files, CSV files, PowerPoints, or JPEGs. <u>If other formats are included, please check with your Lead PA before</u> you upload them. <u>Files that are created by special online platforms or apps cannot be opened</u> with the software on NCDPI computers.

# 2 - 21<sup>st</sup> CCLC Program Site Visit

A Lead PA and Secondary Monitor will visit your 21<sup>st</sup> CCLC program for a couple of hours on the visitation day. An Onsite Agenda Template will be provided by your Lead PA and will provide the framework for our onsite visit including the interviews described in the next section. If you feel that the proposed timeframe of site visits and / or interviews needs to be adjusted or if you have any questions regarding the Onsite Agenda in general, please contact the Lead PA at least one week prior to the monitoring event.

Please let the program staff, feeder schools, and students know that DPI staff will be visiting and that they should not make any special plans for this visit. DPI staff would like the opportunity to visit classrooms and prefer a Program Director led tour.

# **3** - Interviews and Exit Conference

NCDPI staff will interview afterschool program staff, parents, and feeder school administrators and teachers, as described below. Aside from the Program Director interview, the additional group interviews will usually average about 15 to 20 minutes each. The last 30 minutes of the day will be used for an exit conference where DPI staff will share general impressions with the Program Director and receive feedback about the monitoring process and the federal program support provided by DPI.

<u>Program Director & Site Coordinator(s) Interview</u>: This interview will include any administrative staff (including Fiscal Agent) necessary to discuss the topics and the supporting documentation summarized in the *CPMR Instrument*. Typically, this is the first interview conducted once the DPI staff arrives on-site and it occurs before 21<sup>st</sup> CCLC programming begins. This interview will allow DPI staff to ask for clarification on any loose ends that remain after online documentation review.

<u>Feeder School Administrator and Teacher(s)Interviews</u>: Please confirm an interview with feeder school administrator(s) and teacher(s) on the date of the on-site visit. If your program operates off-site of the feeder school, please let your Lead PA know the location of this interview.

<u>21<sup>st</sup> CCLC Program Teacher Interviews</u>: Please select, <u>at minimum, two to three teachers</u> for a group interview with no others present. This should include mostly lead teachers, but it can also include a few others who work primarily with students such as a teacher assistant. A variety of grade levels and teaching areas should be represented.

<u>21<sup>st</sup> CCLC Program Parent Interviews</u>: Please select, at minimum, two to three parents for a group interview with no others present. Please choose from parents who are not employees of the 21<sup>st</sup> CCLC grant.

<u>Exit Conference</u>: The last portion of the visit will serve as an exit conference lasting approximately 15-30 minutes. This will be an opportunity for DPI staff to give you some feedback on their observations based on the visit, interviews and review of documents. However, keep in mind that a full report will not be available until a later date. Finally, the exit conference will give you an opportunity to provide feedback to DPI staff on the monitoring process and their support regarding your 21<sup>st</sup> CCLC program.

#### Appendix F: CPMR Instrument Working Copy

Program Name:	_ Unit/Cohort Number:	 Year of Funding:	
Date of Review:	_ Total Number Students:	 Total Number Sites:	
Program Administrator Completing Review:			

The State Educational Agency (SEA) is required to monitor the quality and effectiveness of the programs operating with funds provided through 21st Century Community Learning Centers (21st CCLC) grant program (EDGAR, 2 CFR § 200.331). Monitoring of the 21st CCLC subgrantees focuses on indicators across five (5) compliance strands: Program Management; Program Implementation; Family Engagement; Federal, State and Local Statutes; and Fiscal Management.

Program Administrators use the instrument to review documentation and conduct interviews compared to the data and narrative descriptions submitted in the approved project. Each indicator within a compliance strand is rated as follows:

Meets Requirements	Meets Requirements with Recommendation(s)	Finding(s)	NA – Not Applicable
Compliance indicator is 100% met and supported by all required evidence(s).	Basic compliance requirements are met; Recommendation(s) are provided for	Evidence or lack of evidence show compliance indicator has not been met.	Accountability standard is not applicable.
All required documents are provided and support compliance.	improvement.	Incomplete or lack of required documentation.	
Interviews support documentation, processes, and implementation.		Interviews lack understanding or support of documentation, processes, and implementation.	
Compliance is consistent at program level and sites sampled.		Compliance is inconsistent at program level and sites sampled.	

Following the review, a report with all ratings will be provided to the primary contact for the 21st CCLC program subgrantee. The subgrantee must respond in writing to each item marked as Finding(s) within thirty (30) business days of receipt of the report. The subgrantee's response must demonstrate the required action has been sufficiently addressed by including supporting documentation with the written response.

NOTE: Because the methodology of the 21st CCLC monitoring includes sampling, the monitoring process cannot produce an all-inclusive assessment of items in this instrument. The 21<sup>st</sup> CCLC program is responsible for operating its categorical programs in compliance with all applicable laws and regulations.

#### STRAND I. PROGRAM MANAGEMENT

21<sup>st</sup> CCLC programs must be managed as described in the approved project during non-school hours or periods when school is not in session (such as before and after school or during summer recess). (*Section 4201(b)(1)(A); Section 4204(b)(2)*)

Indicator	Description	Sample Eviden	ces
1.1	Program targets students who primarily attend schools eligible	Program amendments (if feeder school cl	hanges have occurred)
	for schoolwide programs under Section 1114.	Roster of enrolled students indicating fee	der school
		Sample of daily attendance records for ea	ach site
Notes:			Rating:
			Meets Requirements
			Meets Requirements with
			Recommendation(s)
1.2	Program consistently serves projected number of students	Enrollment and daily attendance records	for each site
	and/or can demonstrate recruitment efforts to maintain or	Program Attendance Update form	
	increase the number of students served according to the	Recruitment plan/marketing materials	
	description in the approved project.	Verification of total average daily attenda	
Notes:			Rating:
			Meets Requirements
			Meets Requirements with
			Recommendation(s)
			□Finding(s)
1.3	Program operates outside of the regular school day for a	Feeder school(s) calendar(s)/hours of sch	ool day
	minimum of 12 hours per week at each site.	Programmatic schedule with student con	tact days/hours of operation
Notes:			Rating:
			□ Meets Requirements
			□ Meets Requirements with
			Recommendation(s)
			□Finding(s)
1.4	Program is adequately staffed as described in the project	Documented hiring procedures	
	application.	Job descriptions of key personnel	
		Organization chart	

Notos			Dating
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
1.5	Program conducts staff training on written policies and procedures.	Samples of written communication with s Schedule of staff training with example m of meetings Staff handbook	
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
			•
1.6	Program maintains ongoing communication and collaboration with feeder schools.	Samples of communications (e.g., memos schools Schedule of communication with feeder s	
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
			•
1.7	Program disseminates information about the community learning center (including its location) to the community in a manner that is understandable and accessible.	Evidence of sustainability plan implementation as described in the approved project (e.g., records of matching contributions, letters of support, etc.) Samples of communication with stakeholders (e.g., brochures, flyers, social media examples, etc.)	
Notes:		· · · · ·	Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)

1.8	Program implements a data collection plan and timeline that focuses on student attendance, at least one GPRA measure, and use of data for improvement and annual reporting.	Data collection schedule and persons identified responsible to ensure data is available for timely improvement and annual reporting Program Assessment Summary Samples of data collections (e.g., school attendance, disciplinary referrals, surveys, NC CAP Self-Assessment, etc.)	
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
1.9	Program attendance records are maintained daily at each program site.	Samples of daily attendance records at ea	ach site
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
	1		•
1.10	Program adheres to written policies and procedures for attendance data entry into the Attendance Module of 21DC.	Evidence of staff implementation of writt Evidence of timely completion of required Written policies/procedures	• • • •
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)

#### STRAND II. PROGRAM IMPLEMENTATION

21<sup>st</sup> CCLC programs must use award funds to offer students a broad array of services and activities that are designed to reinforce and complement the regular academics of participating students described in the grant. (*Section 4201(a)(2); Section 4204(b)(2)*)

Indicator	Description	Sample Evidences
2.1	Program offers student activities that are 1) focused on reading/language arts and mathematics; and 2) are aligned to the NC Standard Course of Study (NCSOS).	Evidence of alignment to NCSOS (e.g., listed goals, objectives, etc. within lesson planning)

		Samples of daily program schedules for each site	
		Samples of lesson plans	
		Samples of student materials	
Notes:		Rating: Meets Required Meets Required Recomment Finding(s)	uirements with
2.2	Program offers students a broad array of additional services, programs, and activities.	Documented activities as described in the approved proju- lesson plans, materials, field trip follow- up activities, etc Samples of daily program schedules for each site	
Notes:		Rating: Meets Request Meets Request Recomment Finding(s)	uirements with
2.3	Program uses a variety of strategies and/or activities to address various learning interests, grade levels, and abilities.	Samples of lesson plans and/or staff training materials re instructional strategies	flecting
Notes:		Rating: Meets Require Meets Require Recomment Finding(s)	uirements with
		· · ·	
2.4	Program uses effective strategies for student safety and engagement during transition times.	Samples of transition times within daily schedules	
Notes:		Rating: Meets Requ Meets Requ Recommer Finding(s)	uirements with

2.5	Program monitors student progress to ensure that activities are expected to improve student academic achievement as well as overall student success.	Samples of data collections on student pr samples, teacher feedback, etc.) Sample progress reports provided to pare	
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
2.6	Program offers professional development for staff, including volunteers, that is aligned to specific program goals and priorities.	Agendas, sign-in sheets, materials from le Sample evaluations of professional learni Written professional learning plans Yearly schedule of professional learning c	ng activities
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
2.7	Program supports staff to ensure that appropriately qualified	Samples of staff evaluation/feedback cor	amunication regarding
2.7	staff, including volunteers are more likely to continue serving the program effectively.	performance Written evaluation plans	innunication regarding
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)

#### STRAND III. FAMILY ENGAGEMENT

21<sup>st</sup> CCLC programs must offer families of students served by community learning centers opportunities for active and meaningful engagement in their children's education, including opportunities for literacy and related educational development. (*Section 4201(a)(3)*)

	Indicator	Description	Sample Evidences
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3.1	Program maintains a communication plan for reaching out to and engaging families of the students to be served.	Evidence of communications with familie newsletters, progress reports, etc.) align project for each site Written family communication plan	
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
3.2	Program involves parents in the planning of program activities,	Samples of parent surveys	
5.2	as appropriate.	Samples of parent surveys Samples of parent meetings for parent in etc.)	nput (e.g., agendas, sign-in sheets,
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
3.3	Program offers activities for family engagement around support for students' academic needs.	Agendas, sign-in sheets, materials for act Evaluations of family engagement activit Schedule of family engagement activities	ies
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
3.4	Program offers activities for families including opportunities for literacy and related educational development.	Agendas, sign-in sheets, materials for act Evaluations of family engagement activit Schedule of family engagement activities	ies
Notes:	· · · · · · · · · · · · · · · · · · ·		Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)

3.5	Program establishes procedures for communication with non- English speaking and/or illiterate parents, if applicable.	Samples of communications targeting nor illiterate parents Written communication procedures	n-English speaking and/or
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)

# STRAND IV: FEDERAL, STATE, AND LOCAL STATUTES

21<sup>st</sup> CCLC programs must adhere to all applicable federal, state, and local health, safety, and civil rights laws. (Section 4204(b)(2)(N); Section 4204(c); Section 8501(a)-(d))

Indicator	Description	Sample Evidences	
4.1	Program conducts criminal background checks for all staff, including volunteers, prior to working with students.	Samples of dated background check results for staff and/or volunteers, as applicable (10% of all staff or 5 whichever is greater) Statement of assurance, if LEA, for ongoing background checks from human resources office	
Notes:		Rating:□ Meets Requirements□ Meets Requirements withRecommendation(s)□ Finding(s)	
4.2	Program adheres to consultation requirements with private school officials prior to and during program implementation.Agendas, sign-in sheets, minutes of all consultation meetir award, post-award, and during program implementation for private schools)Evidence of communication with private school officials af 		
		the implementation of the program	
		Evidence of communication with private school officials prior to grant being awarded (e.g., Private Schools Consultation form, certified mail receipts, emails, etc.)	
		List of private schools operating in the feeder school areas of the program	
Notes:		Rating:	

			Meets Requirements
			Meets Requirements with
			Recommendation(s)
			□ Finding(s)
4.3	Program implements policies/procedures for expectations for	Samples of written policies/procedures c	ommunicated to staff students
4.5			ommunicated to stan, students,
-	student conduct and disciplinary practices.	and parents	
Notes:			Rating:
			Meets Requirements
			Meets Requirements with
			Recommendation(s)
			□ Finding(s)
4.4	Program implements procedures to ensure student and staff	Schedule of safety drills conducted (e.g.,	fire, adverse weather, etc.)
	safety.	Written emergency preparedness policy/	plan (if LEA, plan must specifically
	,	address the 21 <sup>st</sup> CCLC program)	p () p
		Written adverse weather policy/plan	1
Notes:			Rating:
			Meets Requirements
			☐ Meets Requirements with
			Recommendation(s)
			□ Finding(s)
4.5	Program implements policies/procedures to ensure safe usage	Samples of Internet usage consent forms	for students under the age of 13,
	of the Internet, as applicable.	if applicable	
	, , ,	Written Internet usage policies/procedur	20
Notes:		whiten internet usage policies/procedu	Rating:
Notes.			0
			Meets Requirements
			$\Box$ Meets Requirements with
			Recommendation(s)
			□Finding(s)
			(0)
			•
4.6	Program takes place in a safe and easily accessible facility.	Evidence of accessibility to persons with	disabilities
		Evidence of regular facility maintenance	(e.g., fire inspection reports.
		building inspections, etc.)	
Notes:		<u> </u>	Rating:

			<ul> <li>Meets Requirements</li> <li>Meets Requirements with Recommendation(s)</li> <li>Finding(s)</li> </ul>
4.7	Program ensures that students travel safely to and from the center and home, if applicable.	21 <sup>st</sup> CCLC program-specific transportation Daily drop-off/pick-up schedules for each Evidence of student emergency list availa Specific transportation/vehicle informatio Copies of bus routes Copy of charter bus license and safet Copies of vehicle maintenance and ir List of approved buses with bus num Transportation Activity logs	i site ibility on buses/vans on: y inspection nspection reports
Notes:	·		Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)

#### STRAND V. FISCAL MANAGEMENT

21<sup>st</sup> CCLC programs use funds consistent with descriptions in the approved project, State guidelines and provisions of the Education Department General Administrative Regulations (EDGAR). (2 CFR §200; Section 4204(b)(2)(N))

Indicator	Description	Sample Evidences
5.1	Program has written procedures for financial management in	Written procedures include:
	accordance with applicable provisions of 2 CFR §200.	Allowability
		Cash management
		Compensation
		Conflict of interest
		Equipment management
		Procurement
		Segregation of duties
		Travel
Notes:		Rating:

			<ul> <li>Meets Requirements</li> <li>Meets Requirements with Recommendation(s)</li> <li>Finding(s)</li> </ul>
5.2	Program provides staff training on written procedures for financial management.	Evidence of training (e.g., agendas, sign-i	n sheets, minutes, materials, etc.)
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
5.3	Program maintains an inventory of equipment purchased with grant funds.	Equipment inventory compared to appro Evidence that disposition procedures are Review of equipment matched to invento whichever is greater; if fewer than 5 equ reviewed)	documented and maintained ory (10% of all equipment or 5
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)
5.4	Program maintains procurement procedures for services and goods purchased with grant funds to avoid potential conflicts of interest.	Evidence that procurement methods are thresholds Evidence that no potential or actual conf purchases with grant funds Review of one drawdown compared to: Approved budget and/or budget am Samples of proof of purchase demon necessary (e.g., paid receipts, cance	lict of interest exists for endments nstrating costs are reasonable and lled checks, etc.)
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)

5.5	Program maintains contracts with eligible vendors that have	Evidence that all contracts have been unleaded into CCIP	
5.5	relevant professional qualifications and a taxpayer ID for the	Evidence that all contracts have been uploaded into CCIP Evidence that vendors are not debarred or suspended	
	business.	Evidence that vendors are not program employees	
	business.	Evidence that contracts contain clear specific language regarding ve	andor
		services or goods	
		Samples of contracts compared to invoices	
		If applicable, all contracts for student transportation compared to	
		invoices:	
		Dates of transportation	
		From/to destination for each day	
		Rate per mile as reflected in the contract	
		Number of students transported	
		Vehicle license plate number	
		Total number of miles for the billing period	
Notes:		Rating:	
		Meets Requirements	
		Meets Requirements	with
		Meets Requirements     Recommendation(s)	with
		Meets Requirements	with
		Meets Requirements     Recommendation(s)	with
5.6	Program maintains compensation procedures for employees	Meets Requirements     Recommendation(s)	
5.6	paid with grant funds to ensure that salary paid is	□ Meets Requirements of Recommendation(s) □ Finding(s) Evidence of 21 <sup>st</sup> CCLC staff employment schedules outside of the 21 program	L <sup>st</sup> CCLC
5.6		□ Meets Requirements v Recommendation(s) □ Finding(s) Evidence of 21 <sup>st</sup> CCLC staff employment schedules outside of the 21 program Evidence of other federal or state grants received by the subgrantee	L <sup>st</sup> CCLC e
5.6	paid with grant funds to ensure that salary paid is	<ul> <li>Meets Requirements v Recommendation(s)</li> <li>Finding(s)</li> <li>Evidence of 21<sup>st</sup> CCLC staff employment schedules outside of the 21 program</li> <li>Evidence of other federal or state grants received by the subgrantee Evidence that total salaries and employer taxes for all employees for</li> </ul>	L <sup>st</sup> CCLC e
5.6	paid with grant funds to ensure that salary paid is	<ul> <li>☐ Meets Requirements of Recommendation(s)</li> <li>☐ Finding(s)</li> <li>☐ Finding(s)</li> <li>☐ Evidence of 21<sup>st</sup> CCLC staff employment schedules outside of the 21 program</li> <li>Evidence of other federal or state grants received by the subgrantee</li> <li>Evidence that total salaries and employer taxes for all employees fo 21<sup>st</sup> CCLC program does not exceed 70% of the total yearly budget</li> </ul>	L <sup>st</sup> CCLC e
5.6	paid with grant funds to ensure that salary paid is	<ul> <li>Meets Requirements of Recommendation(s)</li> <li>Finding(s)</li> <li>Evidence of 21<sup>st</sup> CCLC staff employment schedules outside of the 21 program</li> <li>Evidence of other federal or state grants received by the subgrantee</li> <li>Evidence that total salaries and employer taxes for all employees fo 21<sup>st</sup> CCLC program does not exceed 70% of the total yearly budget compared to salary schedule in CCIP</li> </ul>	L <sup>st</sup> CCLC e
5.6	paid with grant funds to ensure that salary paid is	<ul> <li>Meets Requirements of Recommendation(s)</li> <li>Finding(s)</li> <li>Evidence of 21<sup>st</sup> CCLC staff employment schedules outside of the 21 program</li> <li>Evidence of other federal or state grants received by the subgrantee</li> <li>Evidence that total salaries and employer taxes for all employees fo 21<sup>st</sup> CCLC program does not exceed 70% of the total yearly budget compared to salary schedule in CCIP</li> <li>Samples of time and effort documentation</li> </ul>	L <sup>st</sup> CCLC e or the
5.6	paid with grant funds to ensure that salary paid is	<ul> <li>Meets Requirements of Recommendation(s)</li> <li>Finding(s)</li> <li>Evidence of 21<sup>st</sup> CCLC staff employment schedules outside of the 21 program</li> <li>Evidence of other federal or state grants received by the subgrantee</li> <li>Evidence that total salaries and employer taxes for all employees fo 21<sup>st</sup> CCLC program does not exceed 70% of the total yearly budget compared to salary schedule in CCIP</li> <li>Samples of time and effort documentation</li> <li>Personnel Activity Reports (PARs) prepared monthly and dated,</li> </ul>	L <sup>st</sup> CCLC e or the
5.6	paid with grant funds to ensure that salary paid is	<ul> <li>Meets Requirements of Recommendation(s)</li> <li>Finding(s)</li> <li>Evidence of 21<sup>st</sup> CCLC staff employment schedules outside of the 21 program</li> <li>Evidence of other federal or state grants received by the subgrantee</li> <li>Evidence that total salaries and employer taxes for all employees fo 21<sup>st</sup> CCLC program does not exceed 70% of the total yearly budget compared to salary schedule in CCIP</li> <li>Samples of time and effort documentation</li> <li>Personnel Activity Reports (PARs) prepared monthly and dated, by employee and supervisor</li> </ul>	e e for the
	paid with grant funds to ensure that salary paid is	<ul> <li>Meets Requirements of Recommendation(s)</li> <li>Finding(s)</li> <li>Evidence of 21<sup>st</sup> CCLC staff employment schedules outside of the 21 program</li> <li>Evidence of other federal or state grants received by the subgrantee</li> <li>Evidence that total salaries and employer taxes for all employees fo 21<sup>st</sup> CCLC program does not exceed 70% of the total yearly budget compared to salary schedule in CCIP</li> <li>Samples of time and effort documentation</li> <li>Personnel Activity Reports (PARs) prepared monthly and dated,</li> </ul>	e e for the
5.6 Notes:	paid with grant funds to ensure that salary paid is	<ul> <li>Meets Requirements of Recommendation(s)</li> <li>Finding(s)</li> <li>Evidence of 21<sup>st</sup> CCLC staff employment schedules outside of the 21 program</li> <li>Evidence of other federal or state grants received by the subgrantee</li> <li>Evidence that total salaries and employer taxes for all employees fo 21<sup>st</sup> CCLC program does not exceed 70% of the total yearly budget compared to salary schedule in CCIP</li> <li>Samples of time and effort documentation</li> <li>Personnel Activity Reports (PARs) prepared monthly and dated, by employee and supervisor</li> <li>Semi-annual certifications dated/signed by employee and supervisor</li> </ul>	e e for the
	paid with grant funds to ensure that salary paid is	<ul> <li>☐ Meets Requirements of Recommendation(s)</li> <li>☐ Finding(s)</li> <li>☐ Finding(s)</li> <li>☐ Finding(s)</li> <li>☐ Finding(s)</li> </ul>	e or the l/signed ervisor
	paid with grant funds to ensure that salary paid is	<ul> <li>☐ Meets Requirements of Recommendation(s)</li> <li>☐ Finding(s)</li> <li>☐ Finding(s)</li> <li>☐ Finding(s)</li> <li>☐ Evidence of 21<sup>st</sup> CCLC staff employment schedules outside of the 21 program</li> <li>Evidence of other federal or state grants received by the subgrantee</li> <li>Evidence that total salaries and employer taxes for all employees fo 21<sup>st</sup> CCLC program does not exceed 70% of the total yearly budget compared to salary schedule in CCIP</li> <li>Samples of time and effort documentation</li> <li>Personnel Activity Reports (PARs) prepared monthly and dated, by employee and supervisor</li> <li>Semi-annual certifications dated/signed by employee and super</li> </ul>	e or the l/signed ervisor

5.7	Program uses grant funds to supplement, and not supplant, other Federal, State, and local public funds expended to provide 21 <sup>st</sup> CCLC programs and other similar programs.	Evidence of other federal or state grant fu as 21 <sup>st</sup> CCLC grants (e.g., Extended Learnin Support Competitive Grant Program)	
Notes:			Rating: Meets Requirements Meets Requirements with Recommendation(s) Finding(s)

I hereby certify that I have no personal interest or conflict, either in fact or in appearance, that would compromise my ability to conduct an independent review.

(Signature of Program Administrator Completing Review)

(Date)

#### **Appendix G: CPMR Report**

Program Name:	Unit/Cohort:
Primary Contact:	Year of Funding:
Fiscal Agent:	Date of Review:
Program Administrator Completing Review:	

The State Educational Agency (SEA) is required to monitor the quality and effectiveness of the programs operating with funds provided through 21st Century Community Learning Centers (21st CCLC) grant program (EDGAR, 2 CFR § 200.331). Monitoring of the 21st CCLC subgrantee's program focuses on indicators across five (5) compliance strands: Program Management; Program Implementation; Family Engagement; Federal, State and Local Statutes; and Fiscal Management. Each indicator of compliance is rated in the 21<sup>st</sup> CCLC Comprehensive Program Monitoring Review Report (hereafter referred to as Report) as follows:

Meets Requirements	Meets Requirements with Recommendation(s)	Finding(s)	NA – Not Applicable
Compliance indicator is 100% met and supported by all required evidence(s).	Basic compliance requirements are met; recommendation(s) are provided for improvement.	Evidence or lack of evidence shows compliance indicator has not been met.	Accountability standard is not applicable.
All required documents are provided and support compliance.		Incomplete or lack of required documentation.	
Interviews support documentation, processes, and implementation.		Interviews lack understanding or support of documentation, processes, and/or implementation.	
Compliance is consistent at program level and sites sampled.		Compliance is inconsistent at program level and sites sampled.	

The results of the monitoring review are provided in the Report in two parts: 1) Final Ratings for each indicator provided in the table; and 2) A written narrative for indicators rated as Meets Requirements with Recommendation(s) and Findings with Action Required for compliance.

The Report is provided to the Primary Contact for the 21st CCLC program subgrantee.

- It is the responsibility of the Primary Contact to ensure that the Report is shared with all individuals within the subgrantee organization that are responsible for applicable written responses.
- The subgrantee must provide written responses to each item marked as Finding(s) within thirty (30) business days of receipt of the report.
- The subgrantee's written response must include supporting documentation to demonstrate the required action has been sufficiently addressed.
- No response is required for indicators rated as Meets Requirements with Recommendation(s).

*NOTE:* Because the methodology of the 21st CCLC monitoring includes sampling, the monitoring process cannot produce an all-inclusive assessment of items in this instrument. The 21<sup>st</sup> CCLC program is responsible for operating its categorical programs in compliance with all applicable laws and regulations.

#### STRAND I. PROGRAM MANAGEMENT

21<sup>st</sup> CCLC programs must be managed as described in the approved project during non-school hours or periods when school is not in session (such as before and after school or during summer recess). (*Section 4201(b)(1)(A); Section 4204(b)(2)*)

4204(b)(2)) Indicator	Description	Final Rating	Date Finding Resolved (DPI Use Only)
1.1	Program targets students who primarily		
	attend schools eligible for schoolwide programs under Section 1114.		
1.2	Program consistently serves projected		
	number of students and/or can demonstrate		
	recruitment efforts to maintain or increase		
	the number of students served according to		
	the description in the approved project.		
	• Target enrollment per RFP:		
	• # Enrolled as of date of visit:		
	<ul> <li># Attending on date of visit:</li> </ul>		
	• Average Daily Attendance (ADA):		
1.3	Program operates outside of the regular		
	school day for a minimum of 12 hours per		
	week at each site.		
1.4	Program is adequately staffed as described		
	in the project application.		
1.5	Program conducts staff training on written		
	policies and procedures.		
1.6	Program maintains ongoing communication and collaboration with feeder schools.		
1.7	Program disseminates information about the		
	community learning center (including its		
	location) to the community in a manner that		
	is understandable and accessible.		
1.8	Program implements a data collection plan		
	and timeline that focuses on student		
	attendance, at least one GPRA measure, and		
	use of data for improvement and annual		
	reporting.		
1.9	Program attendance records are maintained		
	daily at each program site.		
1.10	Program adheres to written policies and		
	procedures for attendance data entry into		
	the Attendance Module of 21DC.		
	PROGRAM IMPLEMENTATION		
	rograms must use award funds to offer studen e and complement the regular academics of pa		
	section 4204(b)(2))	intropating students described	in the grant. (Section
Indicator	Description	Rating	Date Finding Resolved (DPI Use Only)
2.1	Program offers student activities that are 1)		
	focused on reading/language arts and		
	mathematics; and 2) are aligned to the NC		
	Standard Course of Study (NCSOS).		
2.2	Program offers students a broad array of		
	additional services, programs, and activities.		

2.3	Program uses a variety of strategies and/or		
	activities to address various learning		
	interests, grade levels, and abilities.		
2.4	Program uses effective strategies for student		
	safety and engagement during transition		
	times.		
2.5	Program monitors student progress to		
	ensure that activities are expected to		
	improve student academic achievement as		
	well as overall student success.		
2.6	Program offers professional development		
	for staff, including volunteers, that is aligned		
	to specific program goals and priorities.		
2.7	Program supports staff to ensure that		
	appropriately qualified staff, including		
	volunteers are more likely to continue		
	serving the program effectively.		
	. FAMILY ENGAGEMENT		
	programs must offer families of students served		
	I engagement in their children's education, inc	uding opportunities for liter	acy and related educational
	ent. ( <i>Section 4201(a)(3))</i>		
Indicator	Description	Rating	Date Finding Resolved (DPI Use Only)
3.1	Program maintains a communication plan		
	for reaching out to and engaging families of		
	the students to be served.		
3.2			
3.2	Program involves parents in the planning of		
3.2	Program involves parents in the planning of program activities, as appropriate.		
3.2 3.3	program activities, as appropriate.		
	program activities, as appropriate. Program offers activities for family		
	program activities, as appropriate.		
	program activities, as appropriate. Program offers activities for family engagement around support for students'		
3.3	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs.		
3.3	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs. Program offers activities for families		
3.3	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs. Program offers activities for families including opportunities for literacy and		
3.3	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs. Program offers activities for families including opportunities for literacy and related educational development.		
3.3	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs. Program offers activities for families including opportunities for literacy and related educational development. Program establishes procedures for		
3.3 3.4 3.5	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs. Program offers activities for families including opportunities for literacy and related educational development. Program establishes procedures for communication with non-English speaking		
3.3 3.4 3.5 STRAND IV	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs. Program offers activities for families including opportunities for literacy and related educational development. Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable.	state, and local health, safet	y, and civil rights laws. <i>(Section</i>
3.3 3.4 3.5 STRAND IV 21 <sup>st</sup> CCLC p	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs. Program offers activities for families including opportunities for literacy and related educational development. Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable. <b>: FEDERAL, STATE, AND LOCAL STATUTES</b>	state, and local health, safet	cy, and civil rights laws. <i>(Section</i>
3.3 3.4 3.5 STRAND IV 21 <sup>st</sup> CCLC p	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs. Program offers activities for families including opportunities for literacy and related educational development. Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable. <b>FEDERAL, STATE, AND LOCAL STATUTES</b> programs must adhere to all applicable federal,	state, and local health, safet Rating	cy, and civil rights laws. <i>(Section</i> Date Finding Resolved (DPI Use Only)
3.3 3.4 3.5 STRAND IV 21 <sup>st</sup> CCLC p 4204(b)(2) Indicator	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs. Program offers activities for families including opportunities for literacy and related educational development. Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable. <b>: FEDERAL, STATE, AND LOCAL STATUTES</b> programs must adhere to all applicable federal, (N); Section 4204(c); Section 8501(a)-(d))		Date Finding Resolved
3.3 3.4 3.5 STRAND IV 21 <sup>st</sup> CCLC p 4204(b)(2) Indicator	program activities, as appropriate.Program offers activities for family engagement around support for students' academic needs.Program offers activities for families including opportunities for literacy and related educational development.Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable. <b>FEDERAL, STATE, AND LOCAL STATUTES</b> programs must adhere to all applicable federal, (N); Section 4204(c); Section 8501(a)-(d))DescriptionProgram conducts criminal background		Date Finding Resolved
3.3 3.4 3.5 STRAND IV 21 <sup>st</sup> CCLC p 4204(b)(2) Indicator	program activities, as appropriate.Program offers activities for family engagement around support for students' academic needs.Program offers activities for families including opportunities for literacy and related educational development.Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable. <b>FEDERAL, STATE, AND LOCAL STATUTES</b> rograms must adhere to all applicable federal, (N); Section 4204(c); Section 8501(a)-(d))Program conducts criminal background checks for all staff, including volunteers,		Date Finding Resolved
3.3 3.4 3.5 STRAND IV 21 <sup>st</sup> CCLC p 4204(b)(2) Indicator 4.1	program activities, as appropriate.Program offers activities for family engagement around support for students' academic needs.Program offers activities for families including opportunities for literacy and related educational development.Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable. <b>FEDERAL, STATE, AND LOCAL STATUTES</b> <b>rograms must adhere to all applicable federal,</b> (N); Section 4204(c); Section 8501(a)-(d)) <b>Description</b> Program conducts criminal background checks for all staff, including volunteers, prior to working with students.		Date Finding Resolved
3.3 3.4 3.5 STRAND IV 21 <sup>st</sup> CCLC p 4204(b)(2) Indicator 4.1	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs. Program offers activities for families including opportunities for literacy and related educational development. Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable. <b>FEDERAL, STATE, AND LOCAL STATUTES</b> programs must adhere to all applicable federal, (N); Section 4204(c); Section 8501(a)-(d)) Description Program conducts criminal background checks for all staff, including volunteers, prior to working with students. Program adheres to consultation		Date Finding Resolved
3.3 3.4 3.5 STRAND IV 21 <sup>st</sup> CCLC p 4204(b)(2) Indicator 4.1	program activities, as appropriate. Program offers activities for family engagement around support for students' academic needs. Program offers activities for families including opportunities for literacy and related educational development. Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable. <b>FEDERAL, STATE, AND LOCAL STATUTES</b> <b>rograms must adhere to all applicable federal,</b> (N); Section 4204(c); Section 8501(a)-(d)) Description Program conducts criminal background checks for all staff, including volunteers, prior to working with students. Program adheres to consultation requirements with private school officials		Date Finding Resolved
3.3 3.4 3.5 STRAND IV 21 <sup>st</sup> CCLC p 4204(b)(2)	program activities, as appropriate.Program offers activities for family engagement around support for students' academic needs.Program offers activities for families including opportunities for literacy and related educational development.Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable. <b>FEDERAL, STATE, AND LOCAL STATUTES</b> rograms must adhere to all applicable federal, (N); Section 4204(c); Section 8501(a)-(d))Program conducts criminal background checks for all staff, including volunteers, prior to working with students.Program adheres to consultation requirements with private school officials prior to and during program		Date Finding Resolved
3.3 3.4 3.5 STRAND IV 21 <sup>st</sup> CCLC p 4204(b)(2) Indicator 4.1 4.2	program activities, as appropriate.Program offers activities for family engagement around support for students' academic needs.Program offers activities for families including opportunities for literacy and related educational development.Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable. <b>FEDERAL, STATE, AND LOCAL STATUTES</b> rograms must adhere to all applicable federal, (N); Section 4204(c); Section 8501(a)-(d))Program conducts criminal background checks for all staff, including volunteers, prior to working with students.Program adheres to consultation requirements with private school officials prior to and during program implementation.		Date Finding Resolved
3.3 3.4 3.5 STRAND IV 21 <sup>st</sup> CCLC p 4204(b)(2) Indicator 4.1	program activities, as appropriate.Program offers activities for family engagement around support for students' academic needs.Program offers activities for families including opportunities for literacy and related educational development.Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable. <b>FEDERAL, STATE, AND LOCAL STATUTES</b> rograms must adhere to all applicable federal, (N); Section 4204(c); Section 8501(a)-(d))Program conducts criminal background checks for all staff, including volunteers, prior to working with students.Program adheres to consultation requirements with private school officials prior to and during program		Date Finding Resolved

4.4	Program implements procedures to ensure student and staff safety.		
4.5	Program implements policies/procedures to ensure safe usage of the Internet, as applicable.		
4.6	Program takes place in a safe and easily accessible facility.		
4.7	Program ensures that students travel safely to and from the center and home, if applicable.		
	/. FISCAL MANAGEMENT		
	programs use funds consistent with description		
the Education	tion Department General Administrative Regula		
Indicator	Description	Rating	Date Finding Resolved (DPI Use Only)
5.1	Program has written procedures for financial management in accordance with applicable provisions of 2 CFR §200.		
5.2	Program provides staff training on written procedures for financial management.		
5.3	Program maintains an inventory of equipment purchased with grant funds.		
5.4	Program maintains procurement procedures for services and goods purchased with grant funds to avoid potential conflicts of interest.		
5.5	Program maintains contracts with eligible vendors that have relevant professional qualifications and a taxpayer ID for the business.		
5.6	Program maintains compensation procedures for employees paid with grant funds to ensure that salary paid is commensurate with effort worked on the grant.		
5.7	Program uses grant funds to supplement, and not supplant, other Federal, State, and local public funds expended to provide 21 <sup>st</sup> CCLC programs and other similar programs.		

# **Report Narrative**

Each indicator rated as Finding(s) outlines specific areas of noncompliance and provides the Action Required to meet compliance. Indicators rated as Meets Requirements with Recommendation(s) outline how basic compliance is met but provides recommendations for improvement. Responses from subgrantees are NOT required for indicators rated as Meets Requirements with Recommendation(s).

#### EXAMPLES – DPI USE ONLY (REMOVE THIS SECTION FROM FINAL REPORT)

# Strand II, Indicator 2.6 - Program offers professional development for staff, including volunteers, that is aligned to specific program goals and priorities.

**Meets Requirements with Recommendation:** ABC program met compliance for this indicator. Documentation reviewed included agendas, sign-in sheets, and materials reflecting learning opportunities for staff. In addition, ABC program provided an annual schedule of professional learning opportunities and sample evaluations of activities for staff for sessions that had been provided as of the date of the review. The documentation demonstrated that the professional learning opportunities provided are aligned to the descriptions in the approved application. However, sample evaluations and interviews with staff indicated that some staff members would like additional training on lessons that integrate curriculum to engage students in relevant, meaningful activities that can be connected to real life. It is recommended that feedback from staff evaluations be utilized to plan additional professional learning opportunities based on teacher needs and interests.

#### Actions Required: NO PROGRAM RESPONSE IS REQUIRED

# Strand V, Indicator 4.5 - Program implements policies/procedures to ensure safe usage of the Internet, as applicable.

**<u>Findings:</u>** As outlined in the approved application, the ABC program utilizes computers to practice online tutorials, conduct research, and do project-based learning. While interviews with staff indicated that labs are monitored by the Program Director and Lead teachers to ensure internet safety, the subgrantee could not provide a written Internet usage policy or procedure. In addition, enrollment and attendance records indicate that the program serves students grades K-5 from three feeder schools; however, no Internet usage consent forms for students under the age of 13 were available for review.

#### Actions Required:

- 1. ABC program must develop and submit to NCDPI written policies/procedures to ensure Internet safety for students. Documentation must include agendas and sign-in sheets from staff training to ensure that all staff are trained on written policies/procedures for Internet safety.
- ABC program must develop Internet usage consent forms for students under the age of 13. ABC program must submit to NCDPI a sampling of signed copies of consent forms to include all students under the age of 13 that attended the 21<sup>st</sup> CCLC program on the date of the monitoring review based on attendance records for that date.

Documentation must be received within 30 days of receiving this report.

I hereby certify that I have no personal interest or conflict, either in fact or in appearance, that would compromise my ability to conduct an independent review.

(Signature of Program Administrator Completing Review)

(Date)

#### **Appendix H: FMR Monitoring Report**

Program Name:	Unit/Cohort:
Primary Contact:	Year of Funding:
Fiscal Agent:	Date of Review:
Program Administrator Completing Review:	

The State Educational Agency (SEA) is required to monitor the quality and effectiveness of the programs operating with funds provided through 21st Century Community Learning Centers (21st CCLC) grant program (EDGAR, 2 CFR § 200.331). Fiscal monitoring of the 21st CCLC subgrantees focuses on nine (9) compliance indicators to determine if the subgrantee's financial management systems provides for effective control over and accountability for grant funds, property, and other assets and ensure they are used solely for authorized purposes.

Fiscal Monitors use the instrument to review documentation and conduct interviews. Each indicator is rated as follows:

Meets Requirements	Meets Requirements with Recommendations	Findings	NA – Not Applicable
Compliance indicator is 100% met and supported by all required evidence(s).	Basic compliance requirements are met; recommendations are	Evidence or lack of evidence show compliance indicator has not been met.	Accountability standard is not applicable.
All Required documents are provided and support compliance.	provided for improvement.	Incomplete or lack of required documentation.	
Interviews support documentation, processes, and implementation.		Interviews lack understanding or support of documentation, processes, and implementation.	
Compliance is consistent at program level and sites sampled.		Compliance is inconsistent at program level and sites sampled.	

The results of the monitoring review are provided in the Report in two parts: 1) Final Ratings for each indicator provided in the table; and 2) A written narrative for indicators rated as Meets Requirements with Recommendation(s) and Findings with Action Required for compliance.

The FMR is provided to the Primary Contact for the 21st CCLC program subgrantee.

- It is the responsibility of the Primary Contact to ensure that the Report is shared with all individuals within the subgrantee organization that are responsible for applicable written responses.
- The subgrantee must provide written responses to each item marked as Finding(s) within ten (10) business days of receipt of the report.
- The subgrantee's response must 1) demonstrate the required action has already been addressed by including supporting documentation with the response, or 2) describe a specific action plan for completing the required action with a detailed timeline and persons responsible.
- No response is required for indicators rated as Meets Requirements with Recommendation(s).
- If questioned costs in the amount of\$500 or more are identified, access to funds will be disabled immediately. When repayment is received or documentation is provided to substantiate the identified questioned costs, the account will be enabled.

Indicator		Rating	Date Finding Resolved (DPI Use Only)
1.	OVERARCHING: Financial Management Systems		
•	Program's financial management systems provide for effective control over and accountability for grant funds, property, and other assets and ensure they are used solely for authorized purposes. Procedures (2 CFR Part 200.403-405)		
•	Grantee procedures ensure all costs are reasonable and necessary, allocable, properly documented, consistent with grant programs, not used for cost-sharing, and legal under state and local law.		
3.	General Procurement Standards (2 CFR Part 200.318)		
•	Grantee procurement procedures include, but are not necessarily limited to, rationale for the method of procurement, selection of contract type, contractor selection/rejection, and basis for contract price.		
•	Review contracts including those for transportation, parental involvement, bookkeeping, etc. (Any charge with a .3xx account code.) The contract should be reviewed against invoices submitted for payment.		
•	Compare the entity's organization chart with vendor contract to ensure that no potential conflict of interest exists.		
4.	Payroll		
rec	e all employees involved in the project completing uired payroll certification that accurately reflects time rked in the 21 <sup>st</sup> CCLC program?		
•	All employees involved in the project complete required payroll certification that accurately reflects time worked in the 21 <sup>st</sup> CCLC program.		
•	Any employee who works on a single cost objective certifies at least semi-annually the percentage of time he/she works on the activity.		
•	Any employee who works on separate funding codes or multiple cost objectives certifies at least monthly coinciding with one or more pay periods the percentage of time he/she works on the activity.		
•	Employees indicate on timesheets work is performed solely when school is not in session and only when students are being served (i.e., no paid holidays when the program is not serving students).		
•	All job descriptions describe duties and responsibilities that are reflected in the distribution of wages and appear to be of benefit to the grant.		
5.	Budget		

		1
•	Subgrantee receives written approval for all budgets	
	and/or amendments prior to requesting cash	
	reimbursement for costs.	
6.	Equipment	
Are	property records maintained for all equipment	
	chased with grant funds?	
•	Property records maintained for all equipment purchased	
-	with grant funds.	
•	All technology expenses have received pre-approval from	
•	DPI and have been inventoried.	
•	The location of all equipment is known and can be	
	identified as requested.	
•	An inventory of equipment purchased with grant funds is	
	conducted once every 2 years and reconciled with	
	property records.	
7.	Transactions	
	es the subgrantee maintain appropriate documentation	
to s	support the transactions made with grant funds?	
•	Subgrantee maintains appropriate documentation to	
	support the transactions made with grant funds.	
•	Documentation for transactions include check stubs,	
	requisitions (if required), and invoices.	
	requisitions (in required), and involces.	
٠	Proof of Payment includes cancelled checks (front/back),	
	bank statements, credit/debit card statements.	
•	General ledger coding associated with transactions is	
•	readily available and matches the budget.	
•	All payments are made after services are rendered.	
•	If the organization has more than one operating program,	
	funds in support of the identified program are used only	
	for that program.	
•	Gas receipts include vehicle #s or license plate #s,	
	appropriate approval signatures / initials, date of	
	approval and account code.	
•	Appropriate approving signatures /initials, date of	
	approval and account codes are evident on all	
	documents, including all receipts and invoices.	
8.	General (NC DPI Fiscal and Program Guidance)	
•	Grant funds are only used to supplement, not supplant,	
	any federal, state or local dollars available to support	
	activities allowable under the 21st CCLC program.	
•	Only student incentives with no intrinsic value (i.e., less	
	than \$25, school supply-type items) are purchased /	
	provided and these types of expenses are listed in the	
	budget.	
•	Staff and parental meetings / trainings that offer snacks	
	and/or meals are documented with copies of sign-in	
	forms.	
•		
•	Leases (if applicable) do not exceed one year.	

9.	Prior Surveys	
•	If applicable, financial findings or deficiencies identified	
	during previous monitoring events have been corrected.	

#### **Report Narrative**

Each indicator rated as Finding(s) outlines specific areas of noncompliance and provides the Action Required to meet compliance. Indicators rated as Meets Requirements with Recommendation(s) outline how basic compliance is met but provides recommendations for improvement. Responses from subgrantees are NOT required for indicators rated as Meets Requirements with Recommendation(s).

#### EXAMPLES – DPI USE ONLY (REMOVE THIS SECTION FROM FINAL REPORT)

# Indicator 1 – Financial Management Systems

**Finding:** ABC program has written procedures submitted in CCIP that describe procedures for procurement that are compliant with 2 CFR Part 200.318. The written procedures also state that, "All purchases that exceed \$500.00 require an open bid for services or product." However, a review of transactions indicates that no open bid was initiated for Contractor X (see Indicator 3 below).

# Actions Required:

- 1. ABC program must revise written procedures to describe the internal controls in place to ensure compliance with ABC program's written policies. Revised written procedures must be uploaded into CCIP.
- 2. ABC program must submit to DPI documentation of staff training on written procedures. Documentation must include agendas and sign-in sheets to ensure that all staff are trained on the updated written procedures.

#### Indicator 3 – Procurement

*Finding:* Records reviewed indicate that ABC program submitted a reimbursement request for payment made to Contractor X in object code 311 for services provided prior to FRD 01/20/2019. The total payment for 311 was \$750.00. However, no information was provided that demonstrated that ABC program reviewed other options for the service or that an open bid had been conducted.

#### Actions Required:

ABC program must conduct an open bid for the services previously provided by Contractor X. ABC program must submit to DPI documentation that an open bid has been conducted.

#### Indicator 7 – Transactions

<u>Meets Requirements with Recommendation</u>: ABC program met compliance for this indicator. Documentation reviewed for FRD 01/20/2019 indicated that all expenses were properly supported and mapped to the general ledger by line item. All expenses were supported by approving signatures. Receipts and invoices were dated; however, dates were not consistently included to indicate the date of the signature. It is recommended that ABC program include signatures to ensure that approvals are timely.

#### Actions Required: NO PROGRAM RESPONSE IS REQUIRED

I hereby certify that I have no personal interest or conflict, either in fact or in appearance, that would compromise my ability to conduct an independent review.

# Appendix I: Cover Letter – CPMR Report with Findings

[MONTH DATE, YEAR]

[PRIMARY CONTACT] [PROGRAM NAME, UNIT, COHORT] [STREET ADDRESS] [CITY, STATE ZIP]

Dear [PRIMARY CONTACT]:

The North Carolina Department of Public Instruction (DPI) conducted an on-site compliance review of [PROGRAM NAME, UNIT] on [MONTH DATE, YEAR]. Enclosed is the monitoring report which documents the results of the federal program review. The monitoring visit included an examination of program documentation, on-site observations, and interviews with your program staff.

The 21st CCLC Program Director or designee must respond within thirty (30) business days of receipt of this report regarding each item identified for "Required Action(s)." For each "Required Action," the program must provide a written response and attach documentation that corrective actions have occurred to resolve compliance findings. Send the completed responses and supporting documentation to DPI via email attachment to 21st CCLC Program Administrator, [NAME] at [EMAIL] and copy the email to the Administrative Assistant Richard Trantham at richard.trantham@dpi.nc.gov. Your response is due on or before DATE (30 business days). Failure to respond in writing within 30 business days of receipt of this report will result in the immediate suspension of funds.

Thank you for your continued efforts in supporting North Carolina's school-aged children and their families. If you need additional assistance with this report, please contact your 21st CCLC Program Administrator in time to meet the deadline for response.

Sincerely,

[NAME], Director

[NAME], Section Chief

[AUTHOR: TYPIST INITIALS]

c: [NAME], Lead Program Administrator

# Appendix J: Cover Letter – FMR Report with Findings – No Questioned Costs

#### [MONTH DATE, YEAR]

[PRIMARY CONTACT] [PROGRAM NAME, UNIT, COHORT] [STREET ADDRESS] [CITY, STATE ZIP]

#### Dear [PRIMARY CONTACT]:

The North Carolina Department of Public Instruction (NCDPI) conducted an on-site fiscal compliance review of (Program Name), Unit #\_\_\_, on (Date). In accordance with NCDPI and the Federal Program Monitoring and Support Division, all monitors and program administrators participating in and/or reviewing information related to this site visit, have no affiliation that would compromise their ability to conduct an independent review. Enclosed is the fiscal monitoring report which documents the results of the federal fiscal compliance review. During the on-site review process, NCDPI staff reviewed source documentation and tested the sub-grantee's fiscal procedures through a sampling of the entire fiscal year in areas such as payroll, time and effort reporting, expenditure accounting, inventory, and adherence to indirect cost rates (non-LEAs only). Additionally, NCDPI staff provided technical assistance and informal feedback during this site visit. Therefore, you may have already implemented corrective actions based on the feedback provided. However, evidence of compliance must be submitted to NCDPI in order to finalize the 2019-20 monitoring process.

Please review the attached compliance monitoring report used during the on-site visit, with an emphasis on "Indicators \_\_\_\_\_" of the report. The 21<sup>st</sup> CCLC Fiscal Agent, Program Director or designee must respond within ten (10) business days of receipt of this report regarding each item identified for "Required Action(s)." For each "Required Action," the program must provide documentation/evidence proving the status of the identified compliance concern has been corrected or provide a specific action plan for completing the required action with a detailed timeline and persons responsible.

Failure to respond in writing within 10 business days of receipt of this report will result in the immediate disablement of funding. Your response is due on or before **DATE** (10 business days). In addition, if your organization's response along with any supporting documentation reveals questioned costs, repayment may be required.

Thank you for your continued interest in serving North Carolina students in afterschool programs.

Sincerely,

[NAME], Director

[NAME], Section Chief

[AUTHOR: TYPIST INITIALS]

# Appendix K: Closing Letter – No Findings or Findings Resolved

[MONTH DATE, YEAR]

[PRIMARY CONTACT] [PROGRAM NAME, UNIT, COHORT] [STREET ADDRESS] [CITY, STATE ZIP]

# Dear [PRIMARY CONTACT]:

[NAME OF PROGRAM] 21<sup>st</sup> Century Community Learning Centers (CCLC) Program has successfully met all federal and state statutory compliance requirements related to the *Comprehensive Program Monitoring Review / Fiscal Monitoring Review* conducted by the North Carolina Department of Public Instruction on [MONTH DATE, YEAR].

Thank you for working closely with your 21<sup>st</sup> CCLC *Program Administrator / Fiscal Monitor* to provide a quality academic enrichment program and extended learning opportunities for the youth and families in your community. The State 21<sup>st</sup> CCLC Team looks forward to our continued support of your program toward meeting its goals.

Sincerely,

[NAME], Director

[NAME], Section Chief

[AUTHOR: TYPIST INITIALS]

c: [NAME], Lead Program Administrator / Fiscal Monitor

#### Appendix L: Letters of Repayment - Questioned Costs Over \$500

[PRIMARY CONTACT] [PROGRAM NAME, UNIT, COHORT] [STREET ADDRESS] [CITY, STATE ZIP]

Dear [PRIMARY CONTACT]:

The North Carolina Department of Public Instruction (NCDPI) conducted an on-site fiscal compliance review of (Name of Program), Unit # \_\_\_\_, on (Date). In accordance with NCDPI and the Federal Program Monitoring and Support Division, all monitors and program administrators participating in and/or reviewing information related to this site visit, have no affiliation that would compromise their ability to conduct an independent review. Enclosed is the fiscal monitoring report which documents the results of the federal fiscal compliance review. During the on-site review process, NCDPI staff reviewed source documentation and tested the sub-grantee's fiscal procedures through a sampling of the entire fiscal year in areas such as payroll, time and effort reporting, expenditure accounting, inventory, and adherence to indirect cost rates (non-LEAs only). Additionally, NCDPI staff provided technical assistance and informal feedback during this site visit. Therefore, you may have already implemented corrective actions based on the feedback provided. However, evidence of compliance must be submitted to NCDPI in order to finalize the 2019-20 monitoring process.

Please review the attached compliance monitoring report used during the on-site visit, with an emphasis on "Indicators \_\_\_\_\_\_" of the report. The 21<sup>st</sup> CCLC Fiscal Agent, Program Director or designee must respond within ten (10) business days of receipt of this report regarding each item identified for "Required Action(s)." For each "Required Action," the program must provide documentation/evidence proving the status of the identified compliance concern has been corrected or provide a specific action plan for completing the required action with a detailed timeline and persons responsible. Your response is due on or before DATE (10 business days).

In addition, outstanding questioned costs in the amount of **\$\_\_\_\_\_** were identified and your account in ERaCA has been disabled effective immediately. When repayment is received or documentation is provided to substantiate the identified questioned costs, your account will be enabled.

Send the completed responses to NCDPI via email attachment to 21<sup>st</sup> CCLC Fiscal Monitor, [NAME] at [EMAIL] and also forward a copy to Administrative Assistant Richard Trantham at richard.trantham@dpi.nc.gov.

Please forward all required repayments to the address below: NCDPI Attn: Richard Trantham 6307 Mail Service Center Raleigh, NC 27699-6307

Thank you for your continued interest in serving North Carolina students in afterschool programs.

Sincerely,

[NAME], Director [AUTHOR: TYPIST INITIALS]

#### Appendix L: Letters of Repayment-questioned costs under \$500

[PRIMARY CONTACT] [PROGRAM NAME, UNIT, COHORT] [STREET ADDRESS] [CITY, STATE ZIP]

Dear [PRIMARY CONTACT]:

The North Carolina Department of Public Instruction (NCDPI) conducted an on-site fiscal compliance review of (Name of Program), Unit # \_\_\_\_, on (Date). In accordance with NCDPI and the Federal Program Monitoring and Support Division, all monitors and program administrators participating in and/or reviewing information related to this site visit, have no affiliation that would compromise their ability to conduct an independent review. Enclosed is the fiscal monitoring report which documents the results of the federal fiscal compliance review. During the on-site review process, NCDPI staff reviewed source documentation and tested the sub-grantee's fiscal procedures through a sampling of the entire fiscal year in areas such as payroll, time and effort reporting, expenditure accounting, inventory, and adherence to indirect cost rates (non-LEAs only). Additionally, NCDPI staff provided technical assistance and informal feedback during this site visit. Therefore, you may have already implemented corrective actions based on the feedback provided. However, evidence of compliance must be submitted to NCDPI in order to finalize the 2019-20 monitoring process.

Please review the attached compliance monitoring report used during the on-site visit, with an emphasis on "Cells \_\_\_\_\_" of the report. The 21<sup>st</sup> CCLC Fiscal Agent, Program Director or designee must respond within ten (10) business days of receipt of this report regarding each item identified for "Required Action(s)." For each "Required Action," the program must provide documentation/evidence proving the status of the identified compliance concern has been corrected or provide a specific action plan for completing the required action with a detailed timeline and persons responsible.

In addition, outstanding questioned costs in the amount of **\$\_\_\_\_\_** were identified and repayment is required. Failure to respond in writing within 10 business days of receipt of this report will result in the immediate disablement of funding. Your response is due on or before **DATE** (10 business days).

Send the completed responses to NCDPI via email attachment to 21<sup>st</sup> CCLC Fiscal Monitor, [NAME] at [EMAIL] and also forward a copy to Administrative Assistant Richard Trantham at richard.trantham@dpi.nc.gov.

Please forward all required repayments to the address below: NCDPI Attn: Richard Trantham 6307 Mail Service Center Raleigh, NC 27699-6307

Thank you for your continued interest in serving North Carolina students in afterschool programs.

Sincerely,

[NAME], Director [AUTHOR: TYPIST INITIALS]

#### **Appendix L: Letters of Repayment-Repayment not received**

[PRIMARY CONTACT] [PROGRAM NAME, UNIT, COHORT] [STREET ADDRESS] [CITY, STATE ZIP]

Dear [PRIMARY CONTACT]:

The North Carolina Department of Public Instruction (NCDPI) conducted an on-site fiscal compliance review of (Name of Program), Unit # \_\_\_\_, on (Date). In accordance with NCDPI and the Federal Program Monitoring and Support Division, all monitors and program administrators participating in and/or reviewing information related to this site visit, have no affiliation that would compromise their ability to conduct an independent review. Enclosed is the fiscal monitoring report which documents the results of the federal fiscal compliance review. During the on-site review process, NCDPI staff reviewed source documentation and tested the sub-grantee's fiscal procedures through a sampling of the entire fiscal year in areas such as payroll, time and effort reporting, expenditure accounting, inventory, and adherence to indirect cost rates (non-LEAs only). Additionally, NCDPI staff provided technical assistance and informal feedback during this site visit. Therefore, you may have already implemented corrective actions based on the feedback provided. However, evidence of compliance must be submitted to NCDPI in order to finalize the 2019-20 monitoring process.

Your organization's response on (DATE) *sufficiently addressed some/did not sufficiently address* areas of non-compliance as indicated in the original fiscal monitoring report. As a result, the questioned costs in the amount of \$\_\_\_\_\_\_ identified in the original report *remain / have been reduced to \$\_\_\_\_\_\_*. Your account in ERaCA remains suspended and payment is requested.

Please review the attached compliance monitoring report used during the on-site visit, with an emphasis on **"Indicators**\_\_\_\_\_" of the report. The 21<sup>st</sup> CCLC Fiscal Agent, Program Director or designee must respond within thirty (30) business days of receipt of this report regarding each item identified for "Required Action(s)." For each "Required Action," the program must provide documentation/evidence proving the status of the identified compliance concern has been corrected.

Send the completed responses to NCDPI via email attachment to 21<sup>st</sup> CCLC Fiscal Monitor, [NAME] at [EMAIL] and also forward a copy to Administrative Assistant Richard Trantham at richard.trantham@dpi.nc.gov.

Please forward all required repayments to the address below: NCDPI Attn: Richard Trantham 6307 Mail Service Center Raleigh, NC 27699-6307

Thank you for your continued interest in serving North Carolina students in afterschool programs.

Sincerely,

[NAME], Director [AUTHOR: TYPIST INITIALS]

# Appendix M: Acknowledgement Letter – Repayment of Funds

[MONTH DATE, YEAR]

[PRIMARY CONTACT] [PROGRAM NAME, UNIT, COHORT] [STREET ADDRESS] [CITY, STATE ZIP]

#### Dear [PRIMARY CONTACT]:

This correspondence acknowledges the receipt of your responses to the corrective action(s) outlined in the monitoring report for the 2019-2020 Fiscal Monitoring Review of your 21<sup>st</sup> Century Community Learning Center (21<sup>st</sup> CCLC) program. The documentation submitted sufficiently addresses the findings and any outstanding questioned costs, no further action is required at this time. Effective immediately, access to the ERaCA system has been re-enabled for your entity.

Thank you for your continued efforts in supporting North Carolina's school-aged children and their families. Please continue to work with your 21<sup>st</sup> CCLC Program Administrator for continued support in program quality and compliance.

Sincerely,

[NAME], Director

[AUTHOR: TYPIST INITIALS]

# **Appendix N: Notice of Suspension of Funds Email**

Dear 21<sup>st</sup> CCLC Subgrantee,

As you are aware, the North Carolina Department of Public Instruction (DPI) conducts monitoring reviews for subgrantees for the 21<sup>st</sup> Century Community Learning Centers (CCLC) program. The results of a recent review demonstrate deficiencies in your organization's financial management system resulting in one or more questioned costs. **Effective [DATE], funds for the [SUGBRANTEE NAME] have been suspended until further notice**. Your organization must submit additional documentation as described in the attachment within the next ten (10) business days to avoid repayment of funds.

Thank you for your efforts to adhere to all Federal and State regulations related to the implementation of your 21st CCLC Program. DPI will continue to work with you to support your program's ongoing compliance and overall quality in services to the students and parents in your community.

# **Appendix O: Acknowledgement of Receipt Email**

Dear 21<sup>st</sup> CCLC Subgrantee,

This correspondence acknowledges the receipt of your program's response to the Finding(s) as documented in the [CPMR/FMR] Report from the onsite review of your 21st Century Community Learning Centers (21st CCLC) program on [DATE].

The information provided in your program response resulted in the following action:

□ The data submitted sufficiently addresses the compliance concerns communicated in the report, and a closing letter will be issued indicating that your program is currently in good standing.

□ Additional documentation is required (see comments below). Provide the requested documentation within ten (10) business days of receipt of this email to demonstrate compliance and to avoid any possible punitive action against your program including the disablement of funds. Send the information to me via email and copy to Program Assistant Melba Strickland at melba.strickland@dpi.nc.gov.

Thank you for your efforts to adhere to all Federal and State regulations related to the implementation of your 21st CCLC Program. DPI will continue to work with you to support your program's ongoing compliance and overall quality in services to the students and parents in your community.

Documentation is due on \_\_\_\_\_ (10 business days):

# Appendix P: Budget vs. Expenditure Comparison Email

Dear 21st CCLC Subgrantee,

As you are aware, if actual expenditures exceed by more than ten percent (10%) of the approved budget for any line item, then a budget amendment must be submitted. A review of the expenditures as of [DATE] for [PROGRAM NAME, UNIT], indicates the following issues:

□ There are expenditures that are in excess of 10% of the approved budget. Submit a budget amendment in CCIP within the next ten (10) business days so that the budget reflects the actual costs incurred for each line item.

□ There are expenditures coded to account codes that are not in the approved budget. Submit a budget amendment in CCIP within the next 10 business days so that all costs may be approved prior to repayment being issued.

In order to prevent these issues from becoming questioned costs, please submit a budget amendment form through the Comprehensive Continuous Improvement Plan (CCIP) system no later than [DATE]. If you have any questions or concerns, please do not hesitate to contact me.

# Appendix Q: Expenditure Reporting and Cash Application (ERaCA) Reconciliation Email

Dear 21st CCLC Subgrantee,

As you are aware, subgrantees utilizing the Expenditure Reporting and Cash Application (ERaCA) system must submit supporting documentation for reimbursement requests within ten (10) business days (not including holidays and weekends) of the cash request submission. Reconciliations and corresponding documentation must be aligned with ERaCA submissions for each reimbursement request. The ultimate purpose of these submissions is to verify that there is proof of purchase for the requested reimbursement.

A review of the documentation submitted for [PROGRAM NAME'S] [ERACA DRAWDOWN FUND REQUEST DATE], indicates the following issues:

□ There are cash requests in ERaCA for line items that do not have supporting proof of payment submitted. Submit proof of payment for all line items listed in the ERaCA drawdown fund request date within the next ten (10) business days.

□ There are cash requests in ERaCA for line items that are not included in the approved budget. Submit a budget amendment in CCIP within the next 10 business days so that all costs may be approved prior to repayment being issued.

In order to prevent these issues from becoming questioned costs, please respond to [FISCAL MONITOR NAME] by email at [EMAIL ADDRESS] indicating the changes you will make to address these issue(s) no later than [DATE]. Please remember that identification of questioned costs may result in the suspension of funds.

If you have any questions or concerns, please do not hesitate to contact me.

# **Appendix R: Allowable Costs Checklist for Federal Programs**

### Is the cost:

### Necessary (2 C.F.R. § 200.403(a))

• Is the cost necessary to carry out the plan of the federal program?

### Reasonable (2C.F.R. § 200.404)

- Did the LEA follow its purchasing or procurement procedures?
- Is the cost in line with fair market prices for comparable goods or services?
- Would a "prudent person" agree that the item is reasonable?

### Conforming to Limitations or Exclusions (2 C.F.R. § 200.403(b))

- Is the cost permissible and not explicitly disallowed under the specific items of cost found in the Uniform Grant Guidance 2 C.F.R. § 200.420-475?
- Is the cost permissible under the program statute and regulations?
- Is the cost permissible under the terms and conditions of the sub award?
- Is the cost permissible under state statute?
- Is the cost permissible under the LEA's policies?

# Consistent with Policies and Procedures (2 C.F.R. § 200.403(c))

- Are the LEA's policies and procedures consistent among funding sources?
- Do the LEA's policies and procedures apply the same rules for federal programs as they do for state and local programs?
- Would the cost be the same amount if it was funded by a state or local program?

### Accorded Consistent Treatment (2C.F.R. § 200.403(d))

- Is the cost excluded from the LEA's indirect cost rate?
- Is the cost treating the same for the federal program as it is for state and local programs?

# Allocable (2 C.F.R. § 200.405(a))

- Is the cost incurred specifically for the federal program?
- If the cost benefits the federal program and other work of the agency, was the cost distributed in proportions that may be approximated using reasonable methods?
- Determined in Accordance with Generally Accepted Accounting Principles (GAAP) (2C.F.R. § 200.403(e)) Is the cost determined in accordance with Generally Accepted Accounting Principles (GAAP) or as otherwise provided for in the Uniform Grant Guidance?
- Not used for cost sharing or matching requirements (2 C.F.R. § 200.403(f))
- Is the cost not being used to meet cost sharing or matching requirements of any other federally-financed program?

### Adequately Documented (2 C.F.R. § 200.403(g) and 2 C.F.R. § 200.302(b)(3))

- Is there documentation demonstrating the need, the purchase, and use of the item?
- Are there records that identify the source and application of funds and contain information regarding authorizations, obligations, unobligated balances, assets, expenditures, income and interest that are supported by source documentation?

### Supplemental

• Does the cost meet the supplemental requirements of the federal grant program?

# Except where otherwise authorized by statute, costs must meet the general criteria in order to be allowable under federal awards. A "Yes" response to all the preceding questions implies that a cost may be allowable.

# Appendix S: Program Administrator Tracking Form

The Tracking Form documents the completion of the process and timeline for on-site monitoring reviews. Any modification from the established process and timeline must be documented in the Comments section for each step including, but not limited to, changes to the approved monitoring schedule and requested extensions from subgrantees.

Planning		
	Date	Comments
Notification Letter and Monitoring Instrument Sent		
Follow up email with Agenda and Monitoring Guidelines Sent (CMPRs only)		
Documents Received by Grantee		
Documentation Reviewed by PA		
Fieldwork	-	
	Date	Comments
On-site Review Completed		
Report		
	Date	Comments
Monitoring Report Completed		
Supervisor Notified of Monitoring Report in SharePoint		
Supervisor approves Report to be sent		
Monitoring Report Sent		
Closing Letter Issued: (check one) Findings No Findings		
Resolution of Findings (if applicable)		
	Date	Comments
Monitoring Response Received		
Acknowledgment of Receipt Email Sent		
Additional emails (if applicable)		
Closing Letter Issued		

*My signature verifies that the completed Tracking Form accurately reflects the process and timeline and that documents are filed in SharePoint.* 

Signature of Program Administrator

Date

### **Appendix T: Program Quality Reviews**

# 21<sup>st</sup> Century Community Learning Centers Program Quality Review (PQR) Strand I. Program Management

Program Name:	Unit/Cohort:
Primary Contact:	Year of Funding:
Subgrantee Organization:	Date of Review:
Enrollment/ADA*:	No. Students**:
Program Administrator Completin	PQR:

\*Refers to Average Daily Attendance

\*\*Indicates number of students in attendance on the date of the Program Quality Review.

Feedback:
Commendations:
Concerns:
Recommendations:

STRAND I. PROGRAM MANAGEMENT – 21<sup>st</sup> CCLC programs must be managed as described in the approved project during non-school hours or periods when school is not in session (such as before and after school or during summer recess). (*Section 4201(b)(1)(A); Section 4204(b)(2)*)

Indicator	Description	Guiding Questions	Comments
1.1	Program targets students who primarily attend schools eligible for schoolwide programs under Section 1114.	<ul> <li>How did the organization determine which schools and students to include in the program?</li> <li>Program amendments (if feeder school changes have occurred)</li> <li>Roster of enrolled students indicating feeder school</li> <li>Sample of daily attendance records for each site</li> </ul>	
1.2	Program consistently serves projected number of students and/or can demonstrate recruitment efforts to maintain or increase the number of students served according to the description in the approved project.	<ul> <li>How has the program maintained the number of students according to the project description?</li> <li>Enrollment and daily attendance records for each site</li> <li>Program Attendance Update form</li> <li>Recruitment plan/marketing materials</li> <li>Verification of total average daily attendance (ADA) at time of visit</li> </ul>	
1.3	Program operates outside of the regular school day for a minimum of 12 hours per week at each site.	<ul> <li>What are the successes and challenges the organization has experienced in serving the targeted student population outside of the regular school day?</li> <li>Feeder school(s) calendar(s)/hours of school day</li> <li>Program schedule with student contact days/hours of operation for each site</li> </ul>	
1.4	Program is adequately staffed as described in the project application.	<ul> <li>Has the organization adequately staffed the program as described? Have there been any challenges in ensuring that the program is adequately staffed during hours of operation for students?</li> <li>Documented hiring procedures</li> <li>Job descriptions of key personnel</li> <li>Organization chart</li> </ul>	
1.5	Program conducts staff training on written policies and procedures.	What trainings have taken place so far? Are any changes planned based on staff feedback from these trainings (e.g., training evaluations)?	

		<ul> <li>Samples of written communication with staff members</li> <li>Schedule of staff training with example materials, sign-in-sheets, minutes of meetings</li> <li>Staff handbook</li> </ul>	
1.6	Program maintains ongoing communication and collaboration with feeder schools.	<ul> <li>How has the program maintained ongoing communication and collaboration with feeder schools?</li> <li>Samples of communications (e.g., memos, letters, emails, etc.) with feeder schools</li> <li>Schedule of communication with feeder schools for each site</li> </ul>	
1.7	Program disseminates information about the community learning center (including its location) to the community in a manner that is understandable and accessible.	<ul> <li>What efforts have been accomplished so far in building community support for the program?</li> <li>Evidence of sustainability plan implementation as described in the approved project (e.g., records of matching contributions, letters of support, etc.)</li> <li>Samples of communication with stakeholders (e.g., brochures, flyers, social media examples, etc.)</li> </ul>	
1.8	Program implements a data collection plan and timeline that focuses on student attendance, at least one GPRA measure, and use of data for improvement and annual reporting.	<ul> <li>What practices and procedures are in place to ensure that data collections are aligned to the measurable program outcomes?</li> <li>Data collection schedule and persons identified responsible to ensure data is available for timely improvement and annual reporting</li> <li>Program Assessment Summary</li> <li>Samples of data collections (e.g., school attendance, disciplinary referrals, surveys, NC CAP Self-Assessment, etc.)</li> </ul>	
1.9	Program attendance records are maintained daily at each program site.	<ul> <li>What procedures are in place to ensure that attendance records are accurately maintained at each site?</li> <li>Samples of daily attendance records at each site</li> </ul>	

1.10	Program adheres to written policies and procedures for attendance data entry into the Attendance Module of 21DC.	<ul> <li>What process is in place to ensure that 21DC attendance data is entered in a timely manner?</li> <li>Evidence of staff implementation of written</li> </ul>	
		<ul> <li>Evidence of start implementation of written policies/procedures</li> <li>Evidence of timely completion of required reporting</li> <li>Written policies/procedures</li> </ul>	

# 21<sup>st</sup> Century Community Learning Centers Program Quality Review (PQR) Strand II. Program Implementation

Program Name:	Unit/Cohort:
Primary Contact:	Year of Funding:
Subgrantee Organization:	Date of Review:
Enrollment/ADA*:	No. Students**:
Program Administrator Completin	g PQR:

\*Refers to Average Daily Attendance

\*\*Indicates number of students in attendance on the date of the Program Quality Review.

Feedback:
Commendations:
Concerns:
Recommendations:

STRAND II: PROGRAM IMPLEMENTATION – 21<sup>ST</sup> CCLC programs must use award funds to offer students a broad array of services and activities that are designed to reinforce and complement the regular academics of participating students described in the grant. (*Section 4201(a)(2); Section 4204(b)(2)*)

Indicator	Description	Guiding Questions	Comments
2.1	Program offers student activities that are 1)	What types of activities are implemented	
	focused on reading/language arts and	that focus on the improvement of	
	mathematics; and 2) aligned to the NC	reading/language arts and math skills?	
	Standard Course of Study (NCSOS).	• Evidence of alignment to NCSOS (e.g.,	
		listed goals, objectives, etc. within lesson	
		planning)	
		Samples of daily program schedules for	
		each site	
		Samples of lesson plans	
		Samples of student materials	
2.2	Program offers students a broad array of	What additional services, programs, and	
	additional services, programs, and activities.	activities are offered? How do they reinforce	
		and complement the regular academics of	
		participating students?	
		Documented activities as described in	
		the approved project (e.g., sample lesson	
		plans, materials, field trip follow- up	
		activities, etc.)	
		Samples of daily program schedules for	
		each site	
2.3	Program uses a variety of strategies and/or	How are individual student interests, grade	
	activities to address various learning	levels, and abilities addressed within	
	interests, grade levels, and abilities.	program activities?	
		Samples of lesson plans and/or staff	
		training materials reflecting instructional	
2.4		strategies	
2.4	Program uses effective strategies for student	What strategies are implemented to ensure	
	safety and engagement during transition	student safety and engagement during transition times?	
	times.		
		<ul> <li>Samples of transition times within daily schedules</li> </ul>	
2.5	Program monitors student progress to ensure	What are the methods used to assess	
2.3	that activities are expected to improve	student progress toward overall program	
	נוומג מכנועוניפא מופ פאטפטנפט נס ווווטוסעפ	goals? How do students know if they are	
		youis: now do students know ij they are	

	student academic achievement as well as overall student success.	<ul> <li>successful? How is student progress</li> <li>communicated to parents and feeder</li> <li>schools?</li> <li>Samples of data collections on student progress (e.g., assessments, work samples, teacher feedback, etc.)</li> <li>Sample progress reports provided to parents and/or feeder schools</li> </ul>	
2.6	Program offers professional development for staff, including volunteers, that is aligned to specific program goals and priorities.	<ul> <li>What professional development activities have been offered? How does the program measure the success of the professional learning?</li> <li>Agendas, sign-in sheets, materials from learning opportunities for staff</li> <li>Sample evaluations of professional learning activities</li> <li>Written professional learning plans</li> <li>Yearly schedule of professional learning opportunities</li> </ul>	
2.7	Program supports staff to ensure that appropriately qualified staff, including volunteers are more likely to continue serving the program effectively.	<ul> <li>How is feedback provided to staff? How often is feedback provided?</li> <li>Samples of staff evaluation/feedback communication regarding performance</li> <li>Written evaluation plans</li> </ul>	

# 21<sup>st</sup> Century Community Learning Centers Program Quality Review (PQR) Strand III. Family Engagement

Program Name:	Unit/Cohort:
Primary Contact:	Year of Funding:
Subgrantee Organization:	Date of Review:
Enrollment/ADA*:	No. Students**:
Program Administrator Completing PQR:	

\*Refers to Average Daily Attendance

\*\*Indicates number of students in attendance on the date of the Program Quality Review.

Feedback:
Commendations:
Concerns:
Recommendations:

STRAND III. FAMILY ENGAGEMENT – 21<sup>st</sup> CCLC programs must offer families of students served by community learning centers opportunities for active and meaningful engagement in their children's education, including opportunities for literacy and related educational development. (*Section 4201(a)(3)*)

Indicator	Description	Guiding Questions	Comments
3.1	Program maintains a communication plan for reaching out to and engaging families of the students to be served.	<ul> <li>How does the program maintain ongoing communication with families?</li> <li>Evidence of communications with families (e.g., flyers, handbooks, newsletters, progress reports, etc.) aligned to description in approved project for each site</li> <li>Written family communication plan</li> </ul>	
3.2	Program involves parents in the planning of program activities, as appropriate.	<ul> <li>How are parents included in the planning of program activities?</li> <li>Samples of parent surveys</li> <li>Samples of parent meetings for parent input (e.g., agendas, sign-in sheets, etc.)</li> </ul>	
3.3	Program offers activities for family engagement around support for students' academic needs.	<ul> <li>What family engagement activities have been offered? How does the program measure the success of these activities?</li> <li>Agendas, sign-in sheets, materials for activities</li> <li>Evaluations of family engagement activities</li> <li>Schedule of family engagement activities for each site</li> </ul>	
3.4	Program offers activities for families including opportunities for literacy and related educational development.	<ul> <li>What activities have been offered to families that support literacy and educational development? How does the program measure the success of these activities?</li> <li>Agendas, sign-in sheets, materials for activities</li> <li>Evaluations of family engagement activities</li> <li>Schedule of family engagement activities for each site</li> </ul>	

3.5	Program establishes procedures for communication with non-English speaking and/or illiterate parents, if applicable.	<ul> <li>How does the program communicate with non-English speaking families and/or illiterate parents or what plans are in place if such a need is identified?</li> <li>Samples of communications targeting non-English speaking and/or illiterate</li> </ul>	
		<ul><li>parents</li><li>Written communication procedures</li></ul>	

# 21<sup>st</sup> Century Community Learning Centers Program Quality Review (PQR) Strand IV. Federal, State, and Local Statutes

Program Name:	Unit/Cohort:			
Primary Contact:	Year of Funding:			
Subgrantee Organization:	Date of Review:	_		
Enrollment/ADA*:	No. Students**:			
Program Administrator Completing PQR:				

\*Refers to Average Daily Attendance

\*\*Indicates number of students in attendance on the date of the Program Quality Review.

Feedback:
Commendations:
Concerns:
Recommendations:

# STRAND IV: FEDERAL, STATE, AND LOCAL STATUTES – 21<sup>st</sup> CCLC programs must adhere to all applicable federal, state, and local health, safety, and civil rights laws. (*Section 4204(b)(2)(N*); Section 4204(c); Section 8501(a)-(d))

Indicator	Description	Guiding Questions	Comments
4.1	Program conducts criminal background checks for all staff, including volunteers, prior to working with students.	<ul> <li>How are criminal background checks incorporated into the program's hiring process?</li> <li>Samples of dated background check results for staff and/or volunteers, as applicable (10% of all staff or 5 whichever is greater)</li> <li>Statement of assurance, if LEA, for ongoing background checks from human resources office</li> </ul>	
4.2	Program adheres to consultation requirements with private school officials prior to and during program implementation.	<ul> <li>How has the program maintained ongoing communication with private school officials?</li> <li>Agendas, sign-in sheets, minutes of all consultation meetings (i.e., pre-award, post-award, and during program implementation for participating private schools)</li> <li>Evidence of communication with private school officials after grant is awarded</li> <li>Evidence of ongoing communication with private school officials during the implementation of the program</li> <li>Evidence of communication with private school officials prior to grant being awarded (e.g., Private Schools Consultation form, certified mail receipts, emails, etc.)</li> <li>List of private schools operating in the feeder school areas of the program</li> </ul>	
4.3	Program implements policies/procedures for expectations for student conduct and disciplinary practices.	<ul> <li>How are the conduct and disciplinary practices developed and communicated to students and families?</li> <li>Samples of written policies/procedures that are communicated to staff, students, and parents</li> </ul>	
4.4	Program implements procedures to ensure student and staff safety.	What procedures are in place to ensure safety? How does the program educate staff, students, and families about safety policies and procedures?	

4.5	Program implements policies/procedures to ensure safe usage of the Internet, as applicable.	<ul> <li>Schedule of safety drills conducted (e.g., fire, adverse weather, etc.)</li> <li>Written emergency preparedness policy/plan (if LEA, plan must specifically address the 21<sup>st</sup> CCLC program)</li> <li>Written adverse weather policy/plan</li> <li>How does the program monitor students using the Internet during program activities?</li> <li>Samples of Internet usage consent forms for students under the age of 13, if applicable</li> </ul>	
		Written Internet usage policies/procedures	
4.6	Program takes place in a safe and easily accessible facility.	<ul> <li>Have there been any challenges with facility accessibility or maintenance? If yes, how have the issues been resolved?</li> <li>Evidence of accessibility to persons with disabilities</li> <li>Evidence of regular facility maintenance (e.g., fire inspection reports, building inspections, etc.)</li> </ul>	
4.7	Program ensures that students travel safely to and from the center and home, if applicable.	<ul> <li>What procedures are in place to ensure that students travel safely to and from the center?</li> <li>21<sup>st</sup> CCLC program-specific transportation policy/procedures</li> <li>Daily drop-off/pick-up schedules for each site</li> <li>Evidence of student emergency list availability on buses/vans</li> <li>Specific transportation/vehicle information: <ul> <li>Copies of bus routes</li> <li>Copy of charter bus license and safety inspection</li> <li>Copies of vehicle maintenance and inspection reports</li> <li>List of approved buses with bus numbers and location</li> <li>Transportation Activity logs</li> </ul> </li> </ul>	

# 21<sup>st</sup> Century Community Learning Centers Program Quality Review (PQR) Strand V. Fiscal Management

Program Name:	Unit/Cohort:			
Primary Contact:	Year of Funding:			
Subgrantee Organization:	Date of Review:			
Enrollment/ADA:*	No. Students:**			
Program Administrator Completing PQR:				

\*Refers to Average Daily Attendance

\*\*Indicates number of students in attendance on the date of the Program Quality Review.

Feedback:
Commendations:
Concerns:
Recommendations:

STRAND V. FISCAL MANAGEMENT – 21<sup>st</sup> CCLC programs use funds consistent with descriptions in the approved project, State guidelines and provisions of the Education Department General Administrative Regulations (EDGAR). (2 CFR §200; Section 4204(b)(2)(N))

Indicator	Description	Guiding Questions	Comments
5.1	Program has written procedures for	How often are the written procedures for	
	financial management in accordance with	financial management reviewed and/or	
	applicable provisions of 2 CFR §200.	revised?	
		Written procedures include:	
		<ul> <li>Allowability</li> </ul>	
		<ul> <li>Cash management</li> </ul>	
		<ul> <li>Compensation</li> </ul>	
		<ul> <li>Conflict of interest</li> </ul>	
		<ul> <li>Equipment management</li> </ul>	
		<ul> <li>Procurement</li> </ul>	
		<ul> <li>Segregation of duties</li> </ul>	
		o Travel	
5.2	Program provides staff training on written	How is staff trained to ensure that written	
	procedures for financial management.	procedures for financial management are	
		followed? How is the implementation of written	
		procedures monitored?	
		• Evidence of training (e.g., agendas, sign-in	
		sheets, minutes, materials, etc.)	
5.3	Program maintains an inventory of	What process is used to maintain the program's	
	equipment purchased with grant funds.	inventory of equipment?	
		Equipment inventory compared to approved	
		budget	
		Evidence that disposition procedures are	
		documented and maintained	
		Review of equipment matched to inventory	
		(10% of all equipment or 5 whichever is	
		greater; if fewer than 5 equipment	
		purchases, all purchases reviewed)	
5.4	Program maintains procurement	How does the program ensure that there is no	
	procedures for services and goods	potential conflict of interest with procurement	
	purchased with grant funds to avoid	of goods and services?	
	potential conflicts of interest.	Evidence that procurement methods are	
		appropriate for purchase amount thresholds	
		• Evidence that no potential or actual conflict	
		of interest exists for purchases with grant	
		funds	

		<ul> <li>Review of one drawdown compared to:         <ul> <li>Approved budget and/or budget amendments</li> <li>Samples of proof of purchase demonstrating costs are reasonable and necessary (e.g., paid receipts, cancelled checks, etc.)</li> </ul> </li> </ul>	
5.5	Program maintains contracts with eligible vendors that have relevant professional qualifications and a taxpayer ID for the business.	<ul> <li>How are vendors selected to ensure that all vendors are eligible (i.e., not debarred or suspended) and that costs are reasonable?</li> <li>Evidence that all contracts have been uploaded into CCIP</li> <li>Evidence that vendors are not debarred or suspended</li> <li>Evidence that vendors are not program employees</li> <li>Evidence that contracts contain clear specific language regarding vendor services or goods</li> <li>Samples of contracts compared to invoices: <ul> <li>Dates of transportation</li> <li>From/to destination for each day</li> <li>Rate per mile as reflected in the contract</li> <li>Number of students transported</li> <li>Vehicle license plate number</li> <li>Total number of miles for the billing period</li> </ul> </li> </ul>	
5.6	Program maintains compensation procedures for employees paid with grant funds to ensure that salary paid is commensurate with effort worked on the grant.	<ul> <li>What did the program consider in determining salaries for staff? How does the program ensure that staff are only compensated for time spend working with the 21<sup>st</sup> CCLC program?</li> <li>Evidence of 21<sup>st</sup> CCLC staff employment schedules outside of the 21<sup>st</sup> CCLC program</li> <li>Evidence of other federal or state grants received by the subgrantee</li> </ul>	

		<ul> <li>Evidence that total salaries and employer taxes for all employees for the 21<sup>st</sup> CCLC program does not exceed 70% of the total yearly budget compared to salary schedule in CCIP</li> <li>Samples of time and effort documentation</li> <li>Personnel Activity Reports (PARs) prepared monthly and dated/signed by employee and supervisor</li> <li>Semi-annual certifications dated/signed by employee and supervisor</li> </ul>	
5.7	Program uses grant funds to supplement, and not supplant, other Federal, State, and local public funds expended to provide 21 <sup>st</sup> CCLC programs and other similar programs.	Does the organization have any out-of-school programs supported with funds other than the 21 <sup>st</sup> CCLC grant? If yes, how does the program ensure that 21 <sup>st</sup> CCLC funds are supplemental to other program funds? Evidence of other federal or state grant funds used for the same purpose as 21 <sup>st</sup> CCLC grants (e.g., Extended Learning and Integrated Student Support Competitive Grant Program)	