

Rhode Island 21st Century Community Learning Centers Monitoring and Risk Response Protocol

Purpose

The Rhode Island Department of Education (RIDE) is required to conduct regular, systematic reviews of 21st Century Community Learning Center sub-grantees to monitor for compliance with federal statutes and regulations, and applicable state rules and policies, per US Department of Education *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (2 CFR §200).

Goals

The goals of RIDE’s 21st CCLC monitoring process are as follows:

1. To ensure compliance with federal and state requirements and minimize the risk of waste, fraud or abuse;
2. To ensure consistent implementation of high-quality programs for children, youth and their families;
3. To ensure that proposed program goals are implemented in accordance with state and federal program expectations; and
4. To identify and, to the extent feasible, address the technical assistance, professional development, and quality improvement needs of sub-grantees.

Monitoring Components

Monitoring of 21st CCLC subgrantees is on-going and consists of the following:

Method & Agent	Description	Frequency
Technical Assistance by RIDE program and/or fiscal staff	Phone, email, written or on-site assistance on specific issues	As needed
Rhode Island Program Quality Assessment (RIPQA), currently conducted by external Quality Advisors through a contract with the United Way of Rhode Island	<ul style="list-style-type: none"> • Conduct Form A observations of at least 3 activities • Conduct Form B organizational assessment • On-site monitoring of “Evidence Binder,” which provides documentation of meeting programmatic, fiscal and legal requirements and of program quality • Develop proposed action plan to address identified recommendations <p>Reports are provided to the program and shared with RIDE staff. Additional technical assistance may be provided in lieu of the above activities, if justified by an analysis of risk (see Risk Response Protocol below).</p>	Every other year for up to 6 years – <i>per grant</i> ; every 3 years thereafter
Technical Assistance by Quality Advisors	Currently 5 hours of technical support, generally focusing on implementation of action plan	RIPQA “off years” (see previous)
Desktop Monitoring by RIDE program and/or fiscal staff	<p>Review of:</p> <ul style="list-style-type: none"> • Annual plans and/or RFP applications • Budgets and budget amendments • RI Annual Performance Report • RIPQA reports, if conducted • Program data and federal data reports via 21APR system • Cash reimbursement requests • Financial status reports • RIDE Sub-Recipient Fiscal Monitoring Survey • Audits • School Reform Plans or Charter School Performance Review documents, as appropriate • Other data or documents, as appropriate 	At least annually

Risk Assessment by RIDE fiscal staff	<p>Assessment of risk, as required by federal Uniform Grant Guidance 2 CFR § 200.331(b), including:</p> <ul style="list-style-type: none"> • Prior audit results • Timeliness of reporting • Recent changes in key personnel • New or substantially changed systems • Extent and results of previous monitoring • Financial stability • Policies, procedures and internal controls • Grant management experience 	Annually
On-site Monitoring by RIDE program staff with fiscal staff	<ul style="list-style-type: none"> • Pre-visit review of desktop monitoring materials • On-site meetings with key programmatic staff, including the Program Director and Site Coordinator(s). This may include the school principal(s), other staff, teachers, contractors, steering committee members, youth advisory board members, or other partners, as needed to assess the program. • On-site meetings with key fiscal staff • On-site review of the “RIPQA Evidence Binder”, back-up documentation for at least one reimbursement request, and other documentation of program compliance and/or program quality, as necessary • On-site observation of physical site and programming for at least one site at each school level served • Debrief discussion • Post-visit follow-up, as necessary with additional questions or review of follow-up documentation <p>Elements reviewed:</p> <ol style="list-style-type: none"> 1. Safety <ul style="list-style-type: none"> a. CPR/First Aid b. Emergency Planning c. Staff/Volunteer Screenings d. Participant Information & Health Needs e. Participant Supervision f. Transportation g. Staff Communications 2. Fiscal Management <ul style="list-style-type: none"> a. Budgeting b. Financial System & Fiscal Controls c. Supplement Not Supplant d. Procurement & Contracting e. Staff Attendance & Time-and-Effort f. Leveraged Funds 3. Governance <ul style="list-style-type: none"> a. Membership & Structure b. Purpose 4. Program <ul style="list-style-type: none"> a. Goals and Objectives b. Student Program Attendance c. Operational Structure 	<p>Regular Visits: Every 3 years, <u>per grantee</u></p> <p>Targeted Visits: <i>ad hoc</i>, if justified by risk analysis (may not include all elements listed). Grantees may request a Targeted Visit, if desired.</p>

- d. Program Offerings
 - e. Program Design & Planning
 - f. Quality Improvement
 - g. Data
 - h. Evaluation
 - i. Staffing
 - j. Professional Development
 - k. Behavior Guidelines
 - l. Private School Services
5. School Linkages
- a. Communication
 - b. Student Needs
 - c. School Decision-Making
 - d. Content Alignment
6. Family, Youth and Community Engagement
- a. Family Engagement
 - b. Youth Voice
 - c. Community Involvement

Site Visit Monitoring Report

Following the visit, the sub-grantee will receive a written report outlining the visit results. For each element reviewed, results will fall under one of four categories:

- **Commendation** indicates an area of demonstrable success.
- **Met Requirements** indicates that all required elements are in place.
- **Recommendation** indicates an area where the program is in compliance with statutes and regulations, but where there is an issue that could be improved in the judgment of the visiting team or individual, based on national and local best practices. Recommendations are not required actions, but do represent areas of improvement that should be prioritized. A written response to recommendations is welcome, but is not required.
- **Finding** indicates noncompliance with a specific element of statute or regulations. Each Finding will be accompanied by one or more **Required Action(s)** that indicate(s) how the finding must be corrected. The sub-grantee will then have 30 calendar days to submit a written response. The response should either a) submit additional documentation to counter the finding or b) include steps and a timeline for addressing the finding.

The site visit monitoring report is sent to the site director. Copies are typically sent to the superintendent, principal, and/or director of the lead community partner agency.

Risk Assessment

As issues are identified via one or more of the above monitoring activities, RIDE will assess the level of risk to the grant and to the quality of services provided to children, youth and their families. The response from RIDE program and/or fiscal staff will depend upon the level of risk and upon the specifics of the situation.

Risk Level	Description	Anticipated Risk Response
Lower-Priority	These are less serious issues which may impact the smooth administration of the grant or limit the quality of services provided, but which are unlikely to result in very low-quality programming or a disruption of services. All grantees face multiple lower-priority issues on a regular basis, not all of which necessarily come to the attention of RIDE. If left unaddressed, over time lower-priority risks may become medium-priority risks.	These issues generally require limited involvement of RIDE staff beyond ensuring that the grantee is aware of the issue or providing limited technical assistance (Steps 1-2 below).
Medium-Priority	These are issues which generally interfere with the effective administration of the grant or to the ongoing quality of services provided, but which are less serious or immediate than higher-priority risks. These also include areas of non-compliance with state or federal program expectations or requirements, as well as failure to implement the grant as proposed, in accordance with the signed Assurances. High numbers of lower-priority risks collectively constitute a medium-priority risk. Medium-priority risks must be addressed; if left unaddressed, over time they are likely to become higher-priority risks.	RIDE will provide technical assistance and support. In some instances, RIDE staff may also impose required actions and temporarily withhold funds (generally Steps 1-4 below, possibly Step 5).
Higher-Priority	<p>These are serious issues which include, but are not limited to:</p> <ul style="list-style-type: none"> • Health or safety concerns for students or staff; • Risk of – or evidence of – waste, fraud or abuse of funds; • Organizational instability, inability to meet fiscal obligations, and/or risk of insolvency; • High numbers of medium-priority risks; • Repeated delays or failure to respond to RIDE requests for reports, data, plans, or other information; • Failure to respond to, or inadequate response to, monitoring findings; • Failure to correct identified medium-priority risks in a timely manner; • Failure to meet special grant award conditions; or • Continued failure to meet grant proposal objectives, provide deliverables, or implement the grant as proposed, in accordance with the signed Assurances. 	RIDE program and/or fiscal staff will generally implement any or all of the steps outlined below (Steps 1-9). Situations that are dangerous, harmful or involve flagrant abuse of grant funds may result in immediate termination of grants (Step 9), without implementing prior steps.

Risk Response Protocol

Although the steps outlined below are generally progressive, they are not necessarily linear. Steps may occur simultaneously, be skipped, or be repeated as necessary until the situation is adequately resolved.

Step 1: Targeted Technical Assistance

Most issues will require limited involvement from RIDE staff:

- Contact the program director regarding identified issues and provide targeted and individualized feedback, clarification, suggestions, support, resources, and technical assistance.
- Conduct informal or formally-scheduled check-ins to assess progress and offer continued support and assistance.
- Include related parties in communication, as appropriate (e.g. the assigned Quality Advisor, site coordinators, principals, the superintendent, advisory group chair, leadership of the lead community partner organization, direct staff, external program providers, etc.)
- If appropriate, communicate issues or concerns to the Quality Advisor(s) assigned to the grantee, to be addressed as part of contracted technical assistance.

Step 2: Meeting with Program Administration

If progress is limited, observation is needed, program response is inadequate, or in-person communication is warranted or desired by either party:

- Schedule a meeting with program administration and other parties, as necessary, to discuss the issue and develop solutions.
- Document the meeting with either written feedback form or meeting notes.

Step 3: Follow-up Letter with Timeline of Deliverables

If the risk is medium-priority or high-priority or if no clear consensus was reached in the meeting with program administration:

- Send a letter to the grantee with a timeline for expected actions and deliverables. Ideally, the timeline and deliverables are developed in conjunction with the program administration in the meeting or during follow-up communication, but they may be imposed by RIDE staff.
- Offer additional recommendations and technical assistance, as appropriate.

Step 4: Delay or Withholding of Funds

If required actions and timelines are unmet:

- Delay reimbursement or withhold funds.
- Communicate to the program administration in writing what steps are necessary in order to have funds released.

Step 5: Special Grant Award Conditions

In conjunction with, or after, Step 4, depending on the nature of the issues:

- Attach “Special Grant Award Conditions” to the grant award which, if not met, may result in delay or withholding of payment or termination of the grant. Depending on the issues, these conditions may include, but are not limited to, requiring the grantee to:
 - Meet timelines and deliverables such as those in Step 3 or Step 6,
 - Conduct audits or correct prior audit findings,
 - Provide additional reporting or documentation, such as back-up documentation for grant reimbursement requests,
 - Notify RIDE immediately of certain actions or milestones,
 - Notify RIDE immediately when various unanticipated events occur, such as significant administrative changes or barriers to implementation of the grant,
 - Submit other fiscal or programmatic documentation, and/or
 - Repay any ineligible expenses identified, using non-federal funds.

Step 6: Intensive Technical Assistance

Depending upon the needs of the program and upon RIDE capacity:

- Provide more intensive technical assistance to the program administration to assist with the implementation of required actions and/or special grant conditions.
- Direct the assigned Quality Advisor to provide additional, more intensive technical assistance around areas of risk, in lieu of conducting a RIPQA Assessment.
- If funds allow, additional resources may be directed to support the provision of contracted technical assistance.

Step 7: Targeted Site Visit

If additional information is needed to assess the nature or scope of the issues, the needs of the program, or barriers to resolution of risks:

- Conduct a targeted site visit. This is typically more limited in scope visit than the regular 3-year visit.
- Issue a written site visit report to the program director, with copies to the superintendent, principal, and/or executive director of the lead community partner agency.

Step 8: Corrective Action Plan

If progress is limited, timelines and deliverables are not met, additional concerns are raised in the site visit, or program response to prior communication is limited:

- Develop a formal Corrective Action Plan with a detailed timeline of expected actions, with specific milestones and deliverables and responsible parties identified for each item.
- Ensure that all appropriate parties are aware of the corrective action plan. This may include the assigned Quality Advisor, site coordinators, principals, the superintendent, the executive director of the lead community partner organization, advisory group chair, direct staff, external program providers, and other partners.
- Schedule periodic check-ins or follow-up meetings with the program director and/or other contacts, as defined in the action plan, regarding the outlined actions. Document meetings with either a written feedback form or meeting notes.
- Offer additional recommendations and technical assistance as necessary to implement the plan.

Step 9: Reduction or Termination of Grant

As a last resort, if required actions and timelines continue to be unmet or if the situation is critical enough to warrant it:

- Reduce the grant award or terminate the grant.
- Refer the situation to RIDE's Legal Office.
- If the grant award is reduced, communicate to the program administration in writing what steps and documentation, if any, are necessary to reverse the reduction.
- If the grant is terminated, make immediate efforts to find another fiscal agent that may be capable of implementing the grant with the same population of students with as little disruption of services as possible.
- Notify all appropriate parties of the reduction or termination of the grant.

Ongoing Communication, Monitoring and Follow-up

Throughout the above process RIDE staff will continue to communicate with program administration on a regular basis, and offer individualized feedback, clarification, suggestions, support, resources, and technical assistance. The further along in the progression of steps this goes without resolution, the more frequent and more formal communication will be. Once the situation is adequately resolved, the issues raised will continue to be tracked via ongoing monitoring efforts, as appropriate to ensure that problems do not resurface.