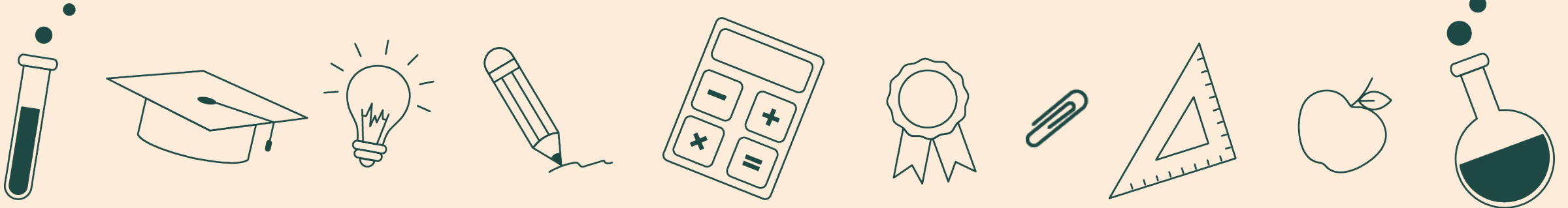




Monitoring 101

Cerrone Lockett, General Counsel

State Charter Schools Commission of Georgia





Presentation Overview

- Introduction to SCSC Monitoring
- How to Read Your Monitoring Letter
- Remediation of Findings



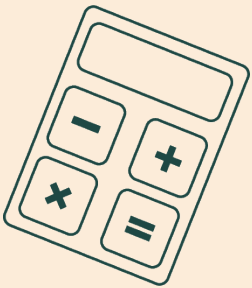


Introduction to SCSC Monitoring



Purpose of SCSC Monitoring

- SCSC is required to annually monitor state charter schools
- Evaluate legal and contractual compliance with financial and operational goals
- Measured in the Operations Section of the SCSC's Comprehensive Performance Framework (CPF)



Stages of SCSC Monitoring

- Stage 1: Pre-Monitoring Questionnaire & Document Review
- Stage 2: Onsite Visit and Interview
- Stage 3: Monitoring Letters
- Stage 4: Corrective Action Plans





Stage 1: Pre-Monitoring Questionnaire & Document Review

Pre-Monitoring Questionnaire & Document Submission



- All schools are required to complete a pre-monitoring questionnaire designed to support an efficient and informative monitoring visit.
- Pre-Monitoring Questionnaire responses are used to determine the statutes and regulations applicable to each school.
- Documents submitted are evaluated as a “snapshot” in time. Documentation submitted after the deadline may not be considered for purposes of determining compliance.





Stage 2: Onsite Visit & Interview

Onsite Visit



- Two to four hours in duration
- Tour of the facility – general health and safety review
- Observation of the school environment
- Random sampling of financial documents
- Review of specific areas of the school, including the nurse's station and records storage areas.



Onsite Interview



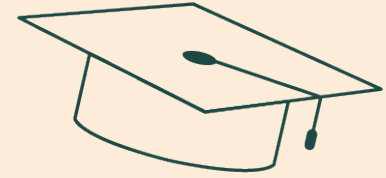
- Evaluates the extent to which school-level practices align with the policies and procedures submitted as a part of document review.
- Should include the school leader and all other individuals familiar with the day-to-day operations of the school.
- Board members are not expected or required to attend.





Stage 3: Monitoring Letters

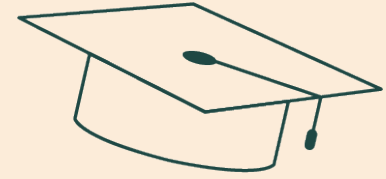
Monitoring Letters



- Monitoring results for the applicable year.
- Sent to the school leader and governing board chair.
- Will be submitted on or before the date included in the Monitoring Handbook.
- Does not include all data points that are incorporated into the Comprehensive Performance Framework (CPF) operations score.



Monitoring Results



Derived from document review, onsite visit and interview, and additional documentation submitted by school staff – at the request of SCSC staff.



Monitoring Results



- **Finding:** A policy, procedure, or practice that violates applicable rules or law. A finding result requires corrective action and will result in point deductions on the CPF measure
- **Adverse Practice:** A policy, procedure, or practices that does not rise to the level of a finding; but requires corrective action. Failure to correct adverse practices will result in point deductions on the CPF in subsequent fiscal years



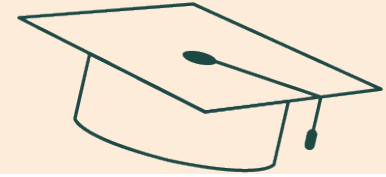
Monitoring Results



- Indicator 1: Educational Program Compliance
- Indicator 2: Financial Oversight
- Indicator 3: Governance and Transparency
- Indicator 4: Students and Employees
- Indicator 5: School Environment
- Indicator 6: Additional and Continuing Obligations



Understanding Monitoring Results

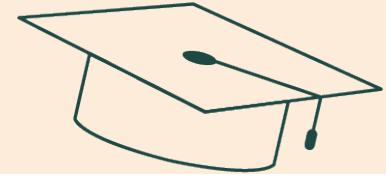


Indicator 4: Students and Employees

Measure	Result	Citation	Comment	Action(s) to Remedy Finding or Adverse Practice
4(a) – Rights of All Students	Met	Not applicable.	This SCSC monitoring did not yield evidence to indicate that the School is not meeting expectations for this measure.	Not applicable.
4(b) – Rights of Students with Disabilities	Finding	34 C.F.R. § 300.100, et seq.; SBOE Rule 160-4-7-.01, et seq.	The SCSC reviewed the School’s policies and procedures to serve with students with disabilities. As a result, the SCSC concludes that the School does not have adequate policies and procedures to serve students with disabilities. Specifically, the School lacks policies and procedures regarding evaluating, locating, and serving students with disabilities.	The School develop policies and procedures to serve students with disabilities, in accordance with federal and state regulations. To evidence compliance, the School must evidence that it has developed policies and procedures to serve students with disabilities that are compliant with federal and state regulations.



Understanding Monitoring Results

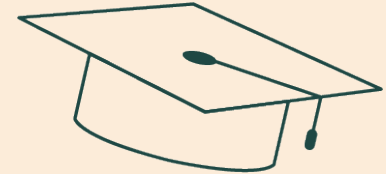


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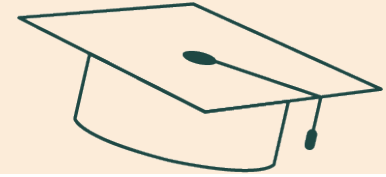


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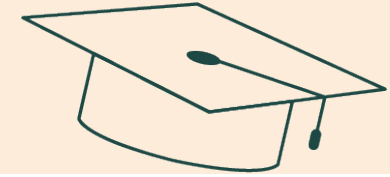


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Understanding Monitoring Results



2(e) – Budget Approved In Accordance with State Law	Finding	O.C.G.A. § 20-2-167.1	The School submitted documents to evidence that its annual operating budget was approved in accordance with state law. The SCSC reviewed the School’s budget approval documentation and found that the School did not allow for seven (7) calendar days between its two budget hearings. Importantly, O.C.G.A. § 20-2-167.1 prohibits the School’s budget hearings from occurring in the same week.	Because the School’s FY21 budget approval was invalid, the School must conduct a new FY21 budget approval and follow all notice and process requirements in state law to ensure the School has a valid FY21 budget. This finding does not provide an opportunity for remediation for the School to receive partial CPF points.
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Stage 4: Corrective Action Plans

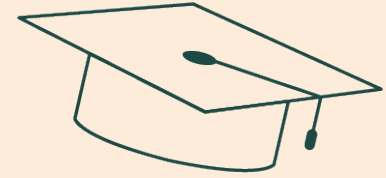
Indicator 2: Financial Oversight



- Common areas of non-compliance:
 - Federal Inventory Management Systems
 - Federal Inventory Policy
 - Federal Purchasing Policies
 - Credit Card Policy
 - Internal Controls for Expense/Travel Reimbursements
 - Adhering to the School's Own Financial Policies
 - Budget Approval Process



Indicator 1: Educational Program Compliance



- Failure to implement essential and innovative features of the contract.
- Accreditation Common areas of non-compliance:
 - If serving grades 8-12, the Charter School shall seek accreditation from an approved accrediting agency identified in O.C.G.A. § 20-3-519(6.1)(A) within the first three years of the initial charter term or prior to a student's graduation and shall retain accredited status thereafter.



Federal Inventory Management



- A description of the equipment.
- A serial number, model number, or other identification number.
- The funding source (including the FAIN) and percentage (who holds title) under which the equipment was acquired.
- The source of property (vendor).
- The acquisition date and unit cost.
- The present location of the equipment.
- Indication of the use of the equipment. For example, instruction, professional learning, parent and family engagement, administration, etc.
- The condition of the equipment.
- The date the information was added to the inventory.
- Who holds title to the equipment? If funds from more than one program was used to purchase the equipment then each program should be listed as the title, and if possible, notation of percentage should be listed.
- All pertinent information on the final transfer, replacement, or disposition of the equipment (including the date of disposal and sale price of the equipment).

Federal Inventory Policy Requirements



- Acquisition of equipment
- Method for entering information into the LEAs inventory management system
- On-site use of equipment
- Physical inventory
- Equipment disposition
- Loss, damage or theft of equipment prevention
- Equipment use for Title I, Part A targeted assistance programs



Federal Purchasing Policy Requirements



Required Internal Control	Requirement	Authorizing Citation
Cash Management to include drawdowns	Written Procedures	§200.302(b)(6), §200.305
Allowability	Written Procedures	§200.302(b)(7)
Equipment Management	Written Procedures	§200.313(d)
Conflict of Interest	Written Standards of Conduct	§200.318(c)
Procurement (Specific levels described in §200.67, §200.88, §200.320 – subject to change.)	Written Procedures	§200.319(c)
Procurement: Competitive Proposals - Conducting Technical Evaluations of Proposals Received and for Selecting Recipients	Written Method	§200.320(d)(3)
Compensation– Personal Services (Time and Effort, Stipends, etc.)	Written Policy	§200.430(a)(1) SBOE 160-3-3-.04
Travel	Written Travel Policy	§200.474(b) OCGA §50-5B-5 OCGA §20-2-167(b) SBOE 160-5-2-.23 Financial Management for GA LUAs Chapter 40
Segregation of Duties	Written Procedures	2 CFR §200.303(a) GAO-14-704G Standards for Internal Controls for the Federal Government 10.03, 10.12-10.14



Credit Card Policy



- Designation of officials authorized to be issued card
- Requirement for authorized users to sign and accept agreement for use of card
- Transaction limit
- Description of what purchases will be authorized
- Description of what purchases will not be authorized
- Designation of the purchasing or credit card administrator
- Process for auditing and reviewing purchases
- Procedures for addressing violations

Source: Local Units of Administration Manual, Section IV, Chapter



Internal Controls for Expense and Travel Reimbursements



- A subordinate employee cannot approve the travel of her superior
- Travel/expense reimbursement approval structure must be clearly articulated in the school's policy



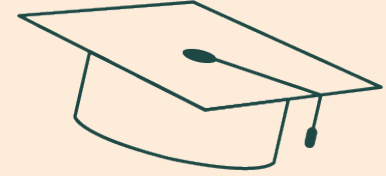
Adhering to the School's Own Financial Policies



- The governing board and relevant school staff members should review the school's financial policies and procedures annually.
- The governing board and relevant school staff should receive training about the school's own financial policies and procedures.



Budget Approval Process



- Ensure that the governing board's two budget hearings occur at least seven calendar days apart.
- Ensure the notice for the school's legal organ about the budget hearings is *advertised* in the legal organ.
- Keep detailed records to evidence compliance.



Indicator 3: Governance and Transparency



- Common areas of non-compliance:
 - Content-based restrictions in public comment policies and procedures
 - Not posting required information to school website
 - Governing board meeting agendas or minutes to not comply with Georgia Open Meetings Act requirements



Website Information

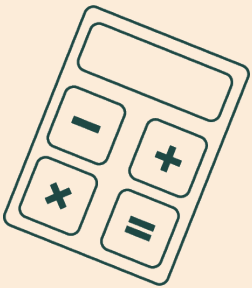


- Governing Board membership;
- Governing Board meeting calendar;
- Meeting agendas for upcoming Governing Board meetings;
- Meeting minutes for past Governing Board meetings unless the Georgia Open Meetings Act limits their publication;
- Procedure for contacting the school's Governing Board;
- Procedure for contacting the school's most senior school administrator;
- Any admissions application utilized by the school;
- Notification of enrollment and admission procedures required by SCSC Rule 691-2-.05, including the date, time, and location of any upcoming enrollment lottery;
- Annual operating budget or summary thereof as required by O.C.G.A. § 20- 2-167.1; and
- The charter school's Charter Contract.



Meeting Agendas

“Prior to any meeting, the agency or committee holding such meeting shall make available an agenda of all matters expected to come before the agency or committee at such meeting.”



Meeting Minutes

“Such minutes shall, at a minimum, include the names of the members present at the meeting, a description of each motion or other proposal made, the identity of the persons making and seconding the motion or other proposal, and a record of all votes.”



Indicator 4: Students and Employees



- Common areas of non-compliance:
 - Requiring social security number or copy of social security card in enrollment documents
 - Unqualified/untrained disciplinary hearing officer
 - Lacking policies and procedures to serve English language learner students
 - Lack policies and procedures to serve students with disabilities



Social Security Number/Cards and Enrollment



- Families are NOT required to provide a student's Social Security Number or Social Security card
- If a family does not wish to provide the student's Social Security Number or the student does not have one, families will sign a statement declining to provide a Social Security Number



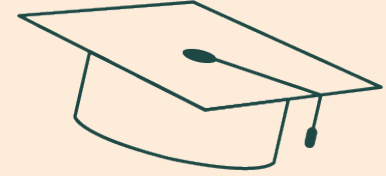
Student Disciplinary Hearing Officer Requirements



- Qualifications
- Training Requirements



English Language Learners



- English language learner procedures must address how the school accurately and timely identifies English language learners



Serving Students with Disabilities



- SBOE rule requires that schools have a policies and procedures to serve students with disabilities that address all the SBOE rules linked [here](#)



Indicator 5: School Environment



- Common areas of non-compliance:
 - School nursing program staffing
 - Care for students with diabetes
 - Lacking required student health policies and procedures



School Nursing Program Staffing



Nursing programs shall be staffed by licensed health care professionals and may include consultation with offsite health care professionals through appropriate protocols and contracts.



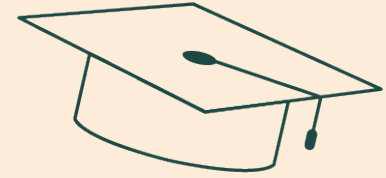
Students with Diabetes



- If a school has a student with diabetes, the school shall ensure that there are at least two school employees trained in accordance with the Georgia Department of Education's Guidelines for the Care Needed for Students with Diabetes
- The training **MUST** be conducted by a school nurse or other health care professional with expertise in diabetes and shall take place prior to the commencement of each school year, or as needed when a student with diabetes enrolls at a school, or when a student is newly diagnosed with diabetes



Student Health Policies



- Infectious Disease Policy
- Nursing Policy



Indicator 6: Continuing and Ongoing Obligations



- Common areas of non-compliance:
 - Not timely remedying non-compliance after notification
 - Lacking appropriate school insurance coverage





Questions?

