

Ohio CSP Grant Administration

Comprehensive Plan

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Introduction

Authorized by Title V, Part B of the Elementary and Secondary Education Act (ESEA) [P.L. 107-110], the federal Charter Schools Program (CSP) provides funding to state educational agencies for the purpose of increasing national understanding of the charter school model and to expand the number of high-quality charter schools available to students across the nation.

The Ohio Department of Education received a competitive, five-year CSP grant from the U.S. Department of Education in October 2015, which continues through Sept. 30, 2020. The purpose of the grant is to financially support the planning, program design and initial implementation of newly opening, high-performing community schools and to support the expansion of already existing high-quality schools (known as "charter schools" in other states). The purpose of Ohio's CSP grant is to increase the number of high-performing community schools and the percentage of community school students enrolled in these schools and to prioritize serving students who are educationally or socioeconomically disadvantaged.

The Comprehensive Plan provides a guide for the overall implementation of the grant and details processes required throughout the lifecycle of the grant.

Sponsor Evaluation and the Subgrant Competition

For a school to be eligible to apply for subgrant funding, its sponsor must meet the following criteria:

- Rated Overall Effective or better for three most recent years and scored 3 or 4 on standards D.02 Enrollment and Financial Reviews, D.03 On-site Visits, D.4 Site Visit Reports, D.05 Performance Monitoring, D.07 Annual Performance Reports, E.01 Renewal Application, and E.02 Renewal and Non-Renewal Decisions or submission of a corrective action plan to Department staff to meet the three-point expectation for the current Sponsor Evaluation; Rated Overall Effective for most recent evaluation, receive 3 or 4 on the majority of Absolute Priority standards: D.02 Enrollment and Financial Reviews, D.03 On-site Visits, D.4 Site Visit Reports, D.05 Performance Monitoring, D.07 Annual Performance Reports, E.01 Renewal Application and E.02 Renewal and Non-Renewal. Or submission of a corrective action plan to meet the 3-point expectation for the current Sponsor Evaluation for three or less of the Absolute Priority standards;
- Sponsors currently engaging in corrective action plan(s) must have an approved CAP prior to the close of the application window in order to be considered eligible for CSP.

Exceptions based on annual approval by United States Department of Education (USDOE)

Annually, the Department updates its Quality Practices rubric to incorporate stakeholder and vendor feedback, streamline the standards and improve the rubric format. The updated rubric maintains its original rigor, and the standards' basis continues to be the standards set forth by the National Association for Charter School Authorizers (NACSA).

The Department will ensure that each subgrant applicant's sponsor meets the above criteria during the Technical Review. Peer reviewers will not score any application submitted by an applicant whose sponsor does not meet all criteria.

Monitoring Subgrantees and the Sponsor Evaluation

The Department will publish sponsor evaluation results by Nov. 15 each year. By Dec. 15, the Office of Community Schools' grants manager will verify that each awardee's sponsor has maintained an overall rating of Effective or better. The grants manager also will review the evaluation results to verify that each subgrantee sponsor earned at least 3 points on standards D.04 and E.02. If a subgrantee sponsor receives a "Not Applicable" for standard E.02, the grants manager will review the evaluation results to verify if the sponsor earned at least 3 points on standard E.01 in the alternative. The grants manager will also verify if the sponsors earned a rating of "Meet Standards" or "Exceeds Standards" on the adherence to quality practices component of the sponsor evaluation.

The grants manager will notify each subgrantee and its sponsor of the outcome of this review. If the sponsor successfully meets all evaluation criteria, neither the school nor the sponsor will have any further required action.

If the sponsor did not fulfill all evaluation criteria, then the sponsor will receive a prescribed corrective action plan along with its notice. This will be in addition to the sponsor quality improvement plans, if applicable. In accordance with the sponsor assurances, sponsors must complete all assigned actions by the stated deadlines. Should a sponsor fail to comply with its prescribed corrective action, the Department may refer the sponsor to the State Board of Education for non-compliance pursuant to Ohio Revised Code 3314.015.

The grants manager will lead the development of each corrective action plan. All requirements in the plan will correspond with the unmet sponsor evaluation criteria. Some missed evaluation criteria will result in standard, automatic consequences. These criteria and their consequences are outlined below. Other missed criteria are circumstantial; in these instances, the grants manager will work with the Office of Community Schools Director and staff to determine appropriate sanctions.

Subgrantee Sponsor Evaluation Corrective Action Framework

Note: The following corrective action plan framework does not guarantee eligibility for newly operating community schools authorized by a sponsor that fails to meet eligibility criteria.

- *A sponsor receives an overall rating of Ineffective:* All sponsors that receive overall ratings of Ineffective must submit sponsor quality improvement plans, as described in ORC 3314.016. The Department specifies the timelines and benchmarks for these plans. Any ineffective sponsor that has one or more subgrant awardees in its portfolio must include additional goals, strategies and action steps in its

improvement plan, which pertain to the sponsor's oversight and technical assistance of the subgrant awardee, specific to the grant. The Department also will require such sponsors to submit progress reports more frequently than other Ineffective sponsors, and to substantiate explanations of progress with documentation.

- *A sponsor receives an overall rating of Poor.* All sponsors that receive overall ratings of Poor have their sponsoring authority revoked immediately, unless the sponsors appeal the revocation.
 - *Poor-rated sponsors that appeal the revocation:* The Department will require such sponsors to complete the same Sponsor Quality Improvement Plan as Ineffective sponsors while the appeal is pending. This condition only applies to a Poor-rated sponsor with subgrant awardees in its portfolio. The improvement plan will allow the Department to support the growth of the sponsor, monitor its ongoing improvement efforts, and ensure that the sponsor is making adequate growth to serve its subgrant school(s) effectively should the appeals court overturn its revocation. It also provides a level of support for subgrantee schools during the appeals process.
 - *Poor-rated sponsors that do not appeal the revocation:* Any sponsor that does not appeal an overall Poor rating has its sponsoring authority revoked immediately. In these cases, the Office of School Sponsorship assumes the sponsor's schools. At minimum, the Department will require the Office of School Sponsorship to submit goals, strategies and action steps it will use to support the subgrant awardee, specific to the grant, using the sponsor improvement plan template.
- *A sponsor with an overall rating of "Effective" or above on the most recent sponsor evaluation but fails to meet at least the 3-point requirements for D.02 Enrollment and Financial Reviews, D.03 On-site Visits, D.04 Site Visit Reports, D.05 Performance Monitoring, D.07 Annual Performance Reports, E.01 Renewal Application and E.02 Renewal and Non-Renewal Decisions, if the sponsor has been rated Effective for the three most recent sponsor evaluations:* All sponsors that have received a rating of Effective or Exemplary for the three most recent sponsor evaluation, will be afforded the opportunity to submit a corrective action plan to document all steps the sponsor has taken or is taking in order to meet the expectations for the 3-point standard for any and all standards rated below a 3 on the 2017-2018 sponsor evaluation that are used for eligibility for CSP. Department staff will review the corrective action plans, and each sponsor will be required to participate in quarterly progress updates with the Department related to implementation of their corrective action plans.
- *A sponsor with an overall rating of "Effective" or above on the most recent sponsor evaluation but fails to meet at least the 3-point requirements for D.02 Enrollment and Financial Reviews, D.03 On-site Visits, D.04 Site Visit Reports, D.05 Performance Monitoring, D.07 Annual Performance Reports, E.01 Renewal Application and E.02 Renewal and Non-Renewal Decisions, if the sponsor has been rated Effective for the most recent sponsor evaluation and met at least the 3-point requirement for four of the seven Absolute Priority Standards:* All sponsors that have received a rating of Effective or Exemplary for the three most recent sponsor evaluation that met at least the 3-point requirement for four of the seven Absolutely Priority Standards, will be afforded the opportunity to submit a corrective action plan to document all steps the sponsor has taken or is taking in order to meet the expectations for the 3-point standard for any and all standards rated below a 3 on the 2017-2018 sponsor evaluation that are used for eligibility for CSP. Department staff will review the

corrective action plans, and each sponsor will be required to participate in quarterly progress updates with the Department related to implementation of their corrective action plans.

OHIO’S CSP GRANT ADMINISTRATION

Sponsor Evaluation and Quality Control

OVERVIEW

The Ohio Department of Education will use the annual sponsor evaluation process as one of the means to monitor sponsors as they provide support to any of their schools that have received CSP subgrants. The Department reviews final sponsor ratings and additional information from the review that reflects on sponsor performance. When the Department identifies information that indicates increased risk in a sponsor’s performance, it assigns corrective action to ensure that each subgrantee receives high-quality monitoring and technical assistance from its sponsor.

The annual sponsor evaluation also impacts the subgrant competition. Please refer to the “Subgrantee Eligibility Screening” process for further information.

PURPOSE

The sponsor evaluation and accompanying quality control procedures are used to support monitoring of sponsors as they support CSP subgrantee schools. Evaluation component ratings (Compliance and Quality Practices) as well as specific scores earned for key Quality Practices standards and specific school-level items of noncompliance provide key performance indicators. This monitoring procedure also includes steps for developing and sharing information with sponsors regarding their performance.

PROCEDURE

1. Generate a list of community school sponsors with one or more schools that received CSP subgrant funding.
2. Review the Sponsor Evaluation summary worksheet for the most recent sponsor evaluation to identify the overall ratings for each sponsor from Step 1.
3. Create a list of subgrant awardee sponsors that earned an overall rating below “Effective.”
4. Review the Sponsor Evaluation Quality Component Detail worksheet for the most recent sponsor evaluation to examine scores earned by sponsors from Step 1.
5. Create a list of subgrant awardee sponsors that did not earn at least a “Meets Standards or Exceeds Standards” for the adherence to quality practices component of the sponsor evaluation.

6. Create a list of subgrant awardee sponsors that did not meet at least the 3-Point Requirements for Standard D.02 – Enrollment and Financial Reviews.
7. Create a list of subgrant awardee sponsors that did not meet at least the 3-Point Requirements for Standard D.03 – Onsite Visits.
8. Create a list of subgrant awardee sponsors that did not meet at least the 3-point requirements for Standard D.04 – Site Visit Reports.
9. Create a list of subgrant awardee sponsors that did not meet at least the 3-Point Requirements for Standard D.05 – Performance Monitoring.
10. Create a list of subgrant awardee sponsors that did not meet at least the 3-Point Requirements for Standard D.07 – Reports.
11. Create a list of subgrant awardee sponsors that did not meet at least the 3-point requirements for Standard E.02 – Renewal and Non-Renewal Decisions.
12. Review the Sponsor Evaluation Compliance Component Detail worksheet for the most recent sponsor evaluation to examine school law misses for sponsors from Step 1.
13. Create a list of subgrant awardee sponsors that had an average number of school misses greater than or equal to 30.
14. Combine lists from Steps 5 – 11 and Step 13 into a single document.
15. Also, create a list that identifies all subgrant awardee sponsors whose evaluation results did not indicate any increased risk (i.e., sponsors that are not on lists from Steps 5 – 11 and Step 13).
16. Submit both lists to the Office of Community Schools' director for review. Modify the document as appropriate based on feedback received.
17. Submit both lists to Data Governance for review. Modify the document as appropriate based on feedback received.
18. Draft individualized letters to sponsors from Step 14, identifying which area(s) in the sponsor evaluation indicate increased risk in the sponsor's performance and directing the sponsor to review and comply with an attached grant-specific corrective action plan.
19. Draft individualized letters to sponsors from Step 15, informing the sponsor that it met all grant-related evaluation score requirements.
20. Convene a meeting with the project director, grants manager and Office of Community Schools' staff.
21. Review each subgrantee sponsor that did not meet all required sponsor evaluation results and itemize each sponsor's infractions.
22. Draft individualized corrective action plan requirements for each sponsor that did not meet all required criteria. When applicable, include predetermined sanctions from the Subgrantee Sponsor Evaluation Corrective Action Framework.
23. Add completed corrective action plan requirements to the appropriate sponsor letters.
24. Submit all letters and corrective action plan requirements to the Office of Community Schools' director for review. Modify the documents as appropriate based on feedback received.
25. Submit all letters and corrective action plan requirements to executive leadership for review. Modify the documents as appropriate based on feedback received.
26. Submit all letters and corrective action plan requirements to Communications for tech edit. Modify the documents as appropriate based on feedback received.
27. Submit draft letters, including corrective action plan requirements, to the Office of Community Schools' director for review. Make any required revisions.
28. Submit final completed letters, including corrective action plan requirements, to executive leadership for document sign-off.
29. Email sponsors with the letters, including the corrective action plan requirements.

KEY RESPONSIBLE STAFF

The Office of Community Schools grants manager
The Office of Community Schools project director

Responsible staff should mail all letters, including corrective action plans, within 30 days of the release of the evaluation results and approval by USDOE.

COMMUNICATION NEEDS

Two template letters will undergo tech edits prior to mailing.

DOCUMENTATION NOTE

Documents related to the evaluation results letters, including the final draft and final sign-off form, will be stored on the CSP SharePoint site in the Sponsor Evaluation folder.

PROCESS

Subgrantee Eligibility Screening

OVERVIEW/BACKGROUND

The Ohio Department of Education limits eligibility for the CSP Subgrant to community schools with sponsors that have been rated at least “Effective” or higher on the most recent Sponsor Evaluation, as well as received scores of 3 points or higher on the most recent Sponsor Evaluation rating quality standards, “Oversight and Evaluation: Site Visit Reports” and “Termination and Renewal Decision-Making: Renewal and Non-Renewal Decisions.” To be eligible for an expansion, planning or implementation subgrant, applicants must meet additional criteria. These criteria are published in advance of the subgrant competition in the Request for Application (RFA).

PURPOSE

The purpose of this procedure is to detail the process of determining and publishing CSP Subgrant eligibility criteria, including a list of qualifying community school sponsors.

PROCEDURE

1. Review the Sponsor Evaluation summary worksheet for the most recent sponsor evaluation to identify the sponsors that were rated “effective” or “exemplary.”
2. Review the Sponsor Evaluation Quality Component Detail worksheet for the most recent sponsor evaluation to identify the sponsors resulting from Step 1 that received scores of 3 points or higher on the most recent Sponsor Evaluation rating but scored two or below on the standards, “Oversight and Evaluation: Site Visit Reports” and “Termination and Renewal Decision-Making: Renewal and Non-Renewal Decisions” of the quality practices rubric.
3. Review the results outlined in Step 2 to verify if any sponsors received a “Not Applicable” rating on standard E.02 Renewal and Non-Renewal Decisions. In this instance, verify if the sponsor scored two points or below for standard E.01 Renewal Application.
4. Generate a list of community school sponsors with schools that would qualify for the upcoming CSP Subgrant competition based on Steps 1,2 and 3 above.
 - a. Note: Sponsor eligibility conditions
 - i. Sponsor Evaluation Overall rating: Effective or Exemplary
 - ii. Quality Practices Rubric Standard D.04: 3 points or greater
 - iii. Quality Practices Rubric Standard E.02: 3 points or greater unless rated “Not Applicable” and must receive 3 points or greater on standard E.01
 - iv. If the sponsor did not meet the 3-point requirements but not less than 2 points on standards D.04 and E.02 (or if E.02 was rated “Not Applicable”, the sponsor must earn 3 points on standard E.01), the sponsor must have been rated “Meets Standards” or Exceeds Standards” on the adherence to quality practices component of the most recent sponsor evaluation to be considered

for a corrective action plan (CAP) for the purposes of CSP eligibility. All eligible sponsors under this provision that receive a rating of “Not Applicable” on standard E.02 and earned 3 points on the standard E.01, must be placed on a corrective action plan that aligns with the 3 point requirements for standard E.02 of the Quality Practices Rubric to be used for the subsequent sponsor evaluation review period.

- v. If any sponsor was placed on a corrective action plan based on its failure to meet the criteria mentioned above, the sponsor must comply with all provisions set forth in the corrective action plan (CAP) for its newly operating community schools to be eligible for CSP subgrant funding before the grant opportunity is released. *If a sponsor earns an overall rating of “Effective or Exemplary” for the sponsor evaluation but fails to earn a rating of “Meets Standards” or Exceeds Standards” for the adherence to quality practices component of the sponsor evaluation and earns less than 3 points on standards D.04 and E.02 (or less than 3 points on E.01 if the sponsor received a “Not Applicable rating on E.02):* All community schools not previously awarded CSP subgrant funds under this USDOE award to the Department are not eligible to apply for CSP subgrant funding due to the sponsors failure to meet the established criteria.
5. Review and modify previous Notice of Grant Opportunity to update the CSP Subgrant Timeline and the list of qualifying sponsors.
6. Submit Notice of Grant Opportunity draft to the Office of Community Schools’ director for review. Modify the document as appropriate based on feedback received.
7. Submit Notice of Grant Opportunity draft to executive leadership for review. Modify the document as appropriate based on feedback received.
8. Submit Notice of Grant Opportunity draft to Communications for tech edit. Modify the document as appropriate based on feedback received.
9. Submit the final Notice of Grant Opportunity document to Legal for document sign-off.
10. Work with Communications staff to update and publish the Intent to Apply instrument.
11. Work with Communications staff to publish the final Notice of Grant Opportunity.

KEY RESPONSIBLE STAFF

The Office of Community Schools grants manager

TIMELINE

The Notice of Grant Opportunity and Intent to Apply should be published 30 days prior to the release of the RFA.

COMMUNICATION NEEDS

The Notice of Grant Opportunity will be published on the CSP page of the Department’s website.

DOCUMENTATION NOTE

Documents related to the Notice of Grant Opportunity, including the final version and sign-off form as well as any other associated documents, will be stored on the CSP SharePoint site in the appropriate folder structure (Subgrant School Year >> Competition >> NGO >>)

PROCESS

Request for Application Process

OVERVIEW

New subgrant applicants must complete an application to compete for available funding. Planning and Implementation Year 1 Subgrantees must complete an application in order to continue subgrant funding in an upcoming fiscal year.

Expansion subgrant applicants must complete an application to compete for available funding. Expansion Year 1 Subgrantees must complete an application in order to continue subgrant funding in an upcoming fiscal year.

The Charter School Program subgrant program is managed in the Comprehensive Continuous Improvement Plan (CCIP). At the beginning of each grant cycle, an application is defined, developed and made available for applicants. The process of making the application available in the CCIP consists of two primary sub-processes:

- A. Request for Application design; and
- B. Technical application development.

Additional procedures related to the Request for Application include:

- C. Applicant technical assistance; and
- D. Needs Assessment Advisory Groups.

A. REQUEST FOR APPLICATION DESIGN

PURPOSE

Design the Charter School Program subgrant Request for Application for both new and continuation applicants that will enable collection of data needed to make the best selection of grantees.

PROCEDURE

1. Review CCIP software release schedule to determine timeline and an available release date.
 2. Review most recent legislative language for requirement changes following last application round.
 3. Review the Request for Application used for the most recent application round.
 4. Review comments from the most recent application round and/or monitoring for suggested changes.
 5. Develop Word version of the Request for Application and associated guidance.
 6. Office of Community Schools' grants manager and Office of Community Schools' director review Request for Application and guidance.
 7. Edit Request for Application and guidance based on feedback. Track changes from the previous year's request for application.
 8. Submit revised Request for Application and guidance to executive leadership for review and feedback.
 9. Edit Request for Application and guidance based on feedback from executive leadership.
 10. Submit draft Request for Application for new subgrant applicants to the advisory committee for feedback.
 11. Edit the Request for Application based on feedback from the advisory committee.
 12. Obtain approval from executive leadership of final Request for Application design.
 13. Submit approved Request for Application design and guidance to Communications for technical edit. Edit based on feedback received. Ensure track changes remain visible.
 14. Submit to Legal for final document sign-off prior to submitting to U.S. Department of Education (USDoe).
 15. Submit the Request for Application, clearly outlining changes from the previous year demonstrating the year to year comparison, to the USDoe for feedback.
 16. If USDoe requests additional revisions, revise the document using track changes, follow steps 8-12 of this procedure and resubmit for final approval from USDoe.
 - a. If USDoe does not request additional revisions and approves the submission, proceed to step 17.
 17. Submit revised request for application to executive leadership and Legal for review and final approval.
 18. Upon final approval from executive leadership, accept track changes.
 19. Submit the final approved request for application to Communications for tech edit.
 20. Publicize the final Request for Application and guidance.
 21. If the subgrant application will not be submitted as uploaded documents, submit final Request for Application design for IT development.
-

KEY RESPONSIBLE STAFF

Office of Community Schools' grants manager

TIMELINE

Begin development upon determination that a new application round will be held. The final request for application design must be available for development a minimum of four weeks prior to the planned software release date.

COMMUNICATION NEEDS

Communication during this process is internal only.

DOCUMENTATION NOTE

Application design and IT formatted documents are stored on the CSP Grant SharePoint site in the Request for Application folder.

B. TECHNICAL APPLICATION DEVELOPMENT (IF APPLICATION WILL NOT BE SUBMITTED AS UPLOADED DOCUMENTS)

PURPOSE

Place the approved CSP subgrant applications (new and continuation) into the CCIP for use for application collection.

PROCEDURE

1. Translate the approved Request for Application into the format required by the CCIP IT development team.
2. Develop validation requirements for application in the CCIP (e.g., warning and error messages based on applicant's responses).
3. Submit approved application and validation requirements to CCIP IT development team.
4. Develop application in the CCIP (completed by CCIP IT development team).
5. Review application provided by the CCIP IT development team, either in print or in the system, to validate the application content in the IT development environment.
6. Work with CCIP IT development team as it makes modifications identified during the development environment review.
7. Review the developed application in the CCIP QA environment (grants manager and one additional staff member), verifying both content and validations.
8. Work with CCIP IT development team to correct any errors identified during the development review.

KEY RESPONSIBLE STAFF

Office of Community Schools' grants manager. The CCIP IT development team plays a key role during this process.

TIMELINE

The approved subgrant application must be available four weeks prior to the planned software release. Allow a minimum of two weeks for development (Step 3) and a minimum of one week for QA review and defect correction (Steps 6 and 7).

Timeline note: If the application design requires development of a new question/prompt type, additional development time will be required.

COMMUNICATION NEEDS

Communication during this process is internal only.

DOCUMENTATION NOTE

Application design and IT formatted documents are stored on the CSP Grant SharePoint site in the Request for Application folder.

C. APPLICANT TECHNICAL ASSISTANCE

PURPOSE

Provide technical assistance to stakeholders on the completion of the CSP subgrant request for application and subgrantee requirements to include:

- A. RFA Webinar
- B. Frequently Asked Questions (FAQs)
- C. Website updates

PROCEDURE

1. RFA Webinar
 - a. Establish date of webinar presentation.
 - b. Schedule webinar with the Office of Communications' staff.
 - c. Send notice of technical assistance webinar opportunity to stakeholders.
 - d. Develop outline of training requirements to include:
 - i. Obtaining an IRN;
 - ii. Accessing the Ohio Education Directory System (OEDS);
 - iii. Accessing and Navigating the CCIP;
 - iv. Completing the Request for Application;
 - v. Request for Application deadlines.
 - e. Draft the RFA Webinar and notes.

- f. Office of Community Schools' grants manager and Office of Community Schools' director review the draft webinar and corresponding notes.
 - g. Edit webinar and notes based on feedback.
 - h. Submit revised webinar and notes to Legal Counsel for review and feedback.
 - i. Edit webinar and notes based on feedback from Legal Counsel.
 - j. Obtain approval of final webinar and notes design.
 - k. Submit approved webinar and notes design to Communications for technical edit.
 - l. Present the webinar on the schedule date.
 - m. Publicize the final webinar to the CSP subgrant webpage.
2. Frequently Asked Questions (FAQs)
- a. Gather stakeholder comments and/or questions.
 - b. Research comments and questions using federal nonregulatory guidance, laws, administrative rules, uniform guidance, etc.
 - c. Draft answers to frequently asked questions.
 - d. Office of Community Schools' grants manager and Office of Community Schools' director review question and draft responses.
 - e. Edit FAQs based on feedback.
 - f. Submit revised FAQs to legal counsel for review and feedback.
 - g. Edit FAQs based on feedback from Legal Counsel.
 - h. Obtain approval of final FAQs design.
 - i. Submit approved FAQs design to Communications for technical edit.
 - j. Publicize the final FAQs.
3. Website Updates
- a. Consult with the Office of Communication staff regarding the CSP subgrant webpage design.
 - b. Draft webpage design with grant materials including but not limited to:
 - i. RFA;
 - ii. FAQs;
 - iii. Webinars;
 - iv. Federal Nonregulatory guidance;
 - v. Ohio's CSP grant application;
 - vi. Responses to U.S. Department of Education;
 - vii. High Risk and Special Conditions;
 - viii. Advisory Committee members, charter, meeting minutes;
 - ix. Application templates;
 - x. Subgrant Awardees per fiscal year;
 - xi. Planning, Implementation, and Expansion rubrics.

KEY RESPONSIBLE STAFF

Office of Community Schools' grants manager. The Office of Communications' staff plays a key role during this process.

TIMELINE

The approved technical assistance webinar will be available at the time of the subgrant opening in the CCIP. The FAQs and the website updates will be ongoing throughout the grant lifecycle.

COMMUNICATION NEEDS

Communication during this process is internal only.

DOCUMENTATION NOTE

Approved technical assistance documents stored on the CSP Grant SharePoint site in the Request for Application folder.

D. NEEDS ASSESSMENT ADVISORY GROUPS (NAAGs)

PURPOSE

Engage Needs Assessment Advisory Groups that wish to participate in the CSP subgrant review process. The Department's engagement process will include:

- A. Identification of Needs Assessment Advisory Groups and Memorandum of Understanding (MOU)
- B. Data requirements
- C. Develop templates
- D. Training of Needs Assessment Advisory Groups
- E. Needs Assessment Advisory Groups' priorities

PROCEDURE

1. Identification of Needs Assessment Advisory Groups and Memorandum of Understanding (MOU)
 - a. Research organizations that meet the criteria established in Ohio's CSP grant application.
 - b. Complete outreach efforts to identified Needs Assessment Advisory Groups.
 - c. Collaborate with Legal Counsel to draft the memorandum of understanding (MOU) for each participating Needs Assessment Advisory Group.
 - d. Obtain approval from executive leadership of final MOU design.
 - e. Submit approved MOU design to Communications for technical edit.
 - f. Submit MOU to Needs Assessment Advisory Groups for signatures.
 - g. Post Needs Assessment Advisory Groups' MOUs to the CSP subgrant webpage.
2. Data Requirements
 - a. Identify the district territory for the participating Needs Assessment Advisory Groups based on the signed MOUs.
 - b. Submit data requests to the data management team for all schools (public and nonpublic if available) using the following data:
 - i. Demographic;
 - ii. Achievement;
 - iii. Scholarship (if available).
3. Develop templates and training materials.
 - a. Develop outline of training requirements.
 - b. Draft the webinar and supporting materials.

- c. Office of Community Schools' grants manager and Office of Community Schools' director review the draft webinar and supporting materials.
 - d. Edit webinar and materials based on feedback.
 - e. Submit revised webinar and materials to executive leadership for review and feedback.
 - f. Edit webinar and materials based on feedback from executive leadership.
 - g. Obtain approval of final webinar and materials design.
 - h. Submit approved webinar and materials design to Communications for technical edit.
 - i. Publicize the final webinar and materials to the CSP subgrant webpage after Needs Assessment Advisory Group training.
4. Training of Needs Assessment Advisory Groups
- a. Establish date of webinar presentation or date webinar will be pre-recorded.
 - b. Schedule webinar with the Office of Communications' staff.
 - c. Send notice of webinar opportunity to Needs Assessment Advisory Group stakeholders (if live presentation).
 - d. Present the webinar on the scheduled date or send link of recorded webinar to Needs Assessment Advisory Group participants.
 - e. Publish the final webinar to the CSP subgrant webpage.
5. Needs Assessment Advisory Groups' priorities
- a. Establish submission deadline of Needs Assessment Advisory Groups' priorities.
 - b. Ensure MOUs are signed.
 - c. Ensure each participating Needs Assessment Advisory Group attended a training session.
 - d. Provide participating Needs Assessment Advisory Groups with district data as outlined above.
 - e. Review submitted Needs Assessment Advisory Group priorities with executive leadership.
 - f. Request revisions to the priorities if not submitted on the uniform template.
 - g. Submit Needs Assessment Advisory Groups priorities to the Data Governance Committee for review.
 - h. Obtain approval of final Needs Assessment Advisory Groups priorities design.
 - i. Publish Needs Assessment Advisory Groups priorities to the CSP subgrant webpage 10 days prior to the RFA opening date in the CCIP.

KEY RESPONSIBLE STAFF

Office of Community Schools' grants manager. The Office of Communications' staff plays a key role during this process.

TIMELINE

Needs Assessment Advisory Group engagement must begin following the release of report card data for the next fiscal year's subgrant competition. All MOUs must be signed by all parties prior to the release of the Needs Assessment Advisory Group priorities. Needs Assessment Advisory Groups priorities must be published on the CSP subgrant webpage 10 days prior to the RFA opening in the CCIP.

COMMUNICATION NEEDS

Communication during this process is internal only.
Ohio CSP Grant: Comprehensive Plan (Revised April 15, 2021)

DOCUMENTATION NOTE

Approved documents stored on the CSP Grant SharePoint site in the Request for Application folder.

PROCESS

Review and Award Process

OVERVIEW/BACKGROUND

Ohio's CSP subgrant review and award process consists of two categories: new subgrant applications for an organization that has not yet received a CSP subgrant, and continuation applications for current subgrantees.

For new subgrant applicants, Ohio's CSP subgrant competition review process includes two levels: a technical review and a peer review. After scoring has been completed, analysis of the scores will result in a determination of the quality cut score for the grant round. Subgrants will be awarded only to applicants whose review score is at or above the calculated quality cut score. Those eligible scores are ranked in order by score and are awarded in ranking order based on the available grant funding.

In addition to the scoring and ranking process, there is a CSP reserve from which funds may be awarded only to successful applicants whose schools are being opened in defined areas. For subgrant recipients awarded funding through the CSP reserve, continuation funding will also come from the CSP reserve.

For current subgrantees, the continuation application process is not competitive. It includes two components: a compliance review and an application content review. Continuation subgrants will be awarded only to subgrantees that have been determined to be eligible on both components.

PURPOSE

The purpose of this procedure is to detail the sub-processes and individual steps that must be taken in order to successfully award subgrants to eligible applicants.

PROCEDURES

The following sub-procedures are included in this section:

- A. Technical Review Checklist for New Subgrant Applications
- B. Subgrant Application Technical Review for New Subgrant Applications
- C. Peer Review Scoring Rubric for New Subgrant Applications
- D. Subgrant Application Peer Review for New Subgrant Applications
- E. Score Analysis for New Subgrant Applications
- F. Scoring Rubric for Continuation Applications
- G. Department Staff Review for Continuation Applications
- H. Score Analysis for Continuation Applications
- I. Subgrant Selection
- J. Award Announcement

A. TECHNICAL REVIEW CHECKLIST FOR NEW SUBGRANT APPLICATIONS

OVERVIEW/BACKGROUND

As described in the CSP Subgrant Review and Award Process, Department staff will conduct a technical review of each application for completeness, adherence to requirements including CMO/EMO relationship, budgetary restrictions, eligibility and compliance with formatting requirements. The review is completed in the CCIP using the official Technical Review Checklist.

PURPOSE

The purpose of this procedure is to detail the requirements and processes associated with the maintenance of the CSP Subgrant Review and Award Process document and the Technical Review Checklist in the CCIP.

PROCEDURE

1. After the RFA has been finalized, review the previous CSP Subgrant Review and Award Process, including the Technical Review Checklist for required modifications. Ensure alignment with CSP grant requirements in the original grant application, all clarifications and the agreed upon procedures for auditing purposes.
2. Confer with Information Technology Office staff for development timeline for the Technical Review Checklist in the CCIP.
3. Review and modify previous CSP Subgrant Review and Award Process as appropriate.
4. Determine the item(s) that will cause the application to be held from advancing to the peer review.
5. Submit CSP Subgrant Review and Award Process draft to the Office of Community Schools' director for review. Modify the document as appropriate based on feedback received.
6. Submit CSP Subgrant Review and Award Process draft to executive leadership for review. Modify the document as appropriate based on feedback received.
7. Submit CSP Subgrant Review and Award Process draft to Communications for technical edit. Modify the document as appropriate based on feedback received.
8. Submit final CSP Subgrant Review and Award Process document to Legal Counsel for document sign-off
9. Submit the final document to Communications to publish the CSP Subgrant Review and Award Process.
10. Submit the final Technical Review Checklist to the CCIP development staff for creation in the CCIP.
11. After the development staff has completed coding the Checklist into the CCIP, perform Quality Assurance to test the Checklist in the QA environment for both content and technical accuracy.

KEY RESPONSIBLE STAFF

The CSP Subgrant Review and Award Process document and the Technical Review Checklist are maintained by the Office of Community Schools' grants manager. The technical development of the checklist is completed by assigned Information Technology Office staff.

TIMELINE

The development of the Technical Review Checklist should begin as soon as the RFA has been finalized. Allow a minimum of a month for development and quality assurance testing. The timeline will be determined through discussion with Information Technology Office staff.

COMMUNICATION NEEDS

No external communication is needed during the development of the Review and Award Process. The CSP Subgrant Review and Award Process document will be published on the CSP Grant page of the Department's website.

DOCUMENTATION NOTE

Documents related to the CSP Subgrant Review and Award Process, including the final version and sign-off form, the Technical Review Checklist, and any other associated documents, will be stored on the CSP SharePoint site in the appropriate folder structure (Subgrant School Year >> Competition >> Technical Review >>).

B. SUBGRANT APPLICATION TECHNICAL REVIEW FOR NEW SUBGRANT APPLICATIONS

OVERVIEW/BACKGROUND

Department staff will conduct a technical review of each application for completeness, adherence to requirements including CMO/EMO relationship, budgetary and programmatic restrictions, eligibility and compliance with formatting requirements. If an application fails to meet any of the reviewed requirements, the OCS Grants Manager, in consultation with the OCS Director and Department leadership, will make a final eligibility decision. If a conclusion is not reached prior to the beginning of the peer review, the application will be included in the review with the option of removing them regarding eligibility prior to award. Applications deemed to be ineligible following the technical review will be disqualified prior to submission to the peer review panel.

PURPOSE

The purpose of this procedure is to detail the requirements and processes associated with the technical review of all applications received through the CSP Subgrant Request for Application.

PROCEDURE

1. Recruit Department staff to complete the technical review.
 - a. The review should be completed by no less than 2 Department staff, including the Office of Community Schools' grants manager.
 - b. While the Office of Community Schools' grants manager should complete the entire review for each received application, the "second" review may be completed by one or more staff members from applicable offices based on area of expertise, including the Office of Community Schools and Grants Management. Consistency must be maintained (i.e. if Grants Management staff is going to complete the Allowable Use of Funds review for one or more applications, that same office staff should complete the same items for each reviewed application).
2. For any staff member that has not previously participated in an application review, instruct them to request the CCIP – ODE Grant Scorer role through the SAFE profile screen.
3. Assign reviewers to the individual applications in the CCIP via the user interface.
4. All department staff assigned to complete the technical review must complete a conflict of interest disclosure prior to completing any reviews.
5. Train selected reviewers on the Technical Review Checklist and expected documentation.
6. Perform technical review on all subgrant applications that have a status of *Authorized Representative Approved* as that status indicates that the application has moved through all required statuses to indicate submission by the applicant organization.
7. After all appropriate applications have been reviewed by a minimum of two Department staff, engage Data Management staff to extract the review results from the CCIP database and identify applications for which there was not consensus between the two reviewers.
8. The Office of Community Schools' director facilitates a consensus meeting to review each application identified in step 8. The appropriate staff member(s) will make changes to their review responses in the CCIP based on the results of the consensus meeting.

9. Engage Data Management staff to extract the final Technical Review scores from the CCIP database.
10. Identify the applications that will advance to the peer review.
 - a. If an application fails to meet any of the reviewed requirements, the OCS Grants Manager, in consultation with the OCS Director and Department leadership, will make a final eligibility decision. If a conclusion is not reached prior to the beginning of the peer review, the application will be included in the review with the option of removing them regarding eligibility prior to award. Applications deemed to be ineligible following the technical review will be disqualified prior to submission to the peer review panel.
11. Conditional Approval:
 - a. If during the technical review for the CSP Implementation or Expansion grant the Department was unable to determine if the applicant met certain eligibility requirements due to an incomplete submission, the Department may conditionally accept the eligibility of the submission and pass the application to the peer review team. The eligibility requirements this would be applicable to would be:
 - i. Applicant meets the federal definition of a charter school [Eligibility Requirement #1].
 - ii. Applicant has an executed contract community school contract [Eligibility Requirement #4]
 - iii. Applicant does not have designated feeder patterns, demonstrating separate and distinct schools [Eligibility Requirement #10]
 - iv. Applicant is unable to demonstrate an “arm’s length” relationship with its contracted CMO/EMO [Ineligibility Criteria #8]
 - b. In the event the application was scored above the established cut-score during the peer review process, the Department may request the incomplete or missing documents be provide for review along with a justification from the applicant/sponsor on why the documents were not submitted. If the additional information demonstrates the applicant meets the requirements, the application will be awarded. If during the review of additional information, the documentation fails to demonstrate the application met the eligibility requirement in question, the application will be denied and no CSP funds will be released.

KEY RESPONSIBLE STAFF

The Office of Community Schools’ grants manager is responsible for overseeing and coordinating all aspects of the Technical Review. In addition, the Office of Community Schools’ grants manager will act as one of the reviewers for each applicable subgrant application.

TIMELINE

The Technical Review may begin as soon as the competitive grant window has closed. The identification and submission of reviewer information to CCIP development staff should be completed prior to the close of the subgrant competition application window.

COMMUNICATION NEEDS

All contact with the technical review staff will be completed by the Office of Community Schools’ grants manager with input from the Office of Community Schools Director as needed.

Ohio CSP Grant: Comprehensive Plan (Revised April 15, 2021)

DOCUMENTATION NOTE

Documents related to the Technical Review, including the data files and any other associated documents, will be stored on the CSP SharePoint site in the appropriate folder structure.

C. PEER REVIEW SCORING RUBRIC FOR NEW SUBGRANT APPLICATIONS

OVERVIEW/BACKGROUND

As described in the CSP Subgrant Review and Award Process, each application that advances from the technical review completed by Department staff will be reviewed by a minimum of three peer reviewers. The review is completed in the CCIP using the official Peer Review scoring rubric that can be found in the Request for Application (RFA).

PURPOSE

The purpose of this procedure is to detail the requirements and processes associated with the maintenance of the CSP Subgrant Peer Review scoring rubric.

PROCEDURE

1. After the RFA has been finalized, review the previous Peer Review scoring rubric for required modifications.
2. Confer with Information Technology Office staff for development timeline (release schedule) for the scoring rubric in the CCIP.
3. Review and modify previous Peer Review scoring rubric as appropriate.
4. Submit the final Peer Review scoring rubric to the CCIP development staff for creation in the CCIP.
5. After the development staff has completed coding the scoring rubric into the CCIP, perform Quality Assurance to test the scoring rubric in the QA environment for both content and technical accuracy.
6. Develop a calibration (sample) application which will be used during the training of selected peer reviewers.
7. Enter the calibration application into the CCIP under the Department IRN during the subgrant competition application window.
8. Notify the CCIP development staff to move the application through the needed status changes to fully submit the application.
9. Develop training materials to be used to prepare peer reviewers.

KEY RESPONSIBLE STAFF

The Peer Review scoring rubric is maintained by the Office of Community Schools' grants manager. The technical development of the scoring rubric is completed by assigned Information Technology Office staff.

TIMELINE

The development of the Peer Review scoring rubric should be started well before the competitive grant competition. It can begin as soon as the RFA has been finalized. Allow a minimum of a month for development and quality assurance testing. The timeline will be determined through discussion with Information Technology Office staff.

COMMUNICATION NEEDS

All communication during this process is internal.

DOCUMENTATION NOTE

Documents related to the CSP Subgrant Peer Review scoring rubric, including the final version submitted to the CCIP development staff will be stored on the CSP SharePoint site in the appropriate folder structure.

D. SUBGRANT APPLICATION PEER REVIEW FOR NEW AND EXPANSION SUBGRANT APPLICATIONS

OVERVIEW/BACKGROUND

The CSP Planning, Implementation, and Expansion subgrant application is competitive. The Department will establish an expert review team comprised of education stakeholders to score CSP subgrant applications using a detailed rubric with established criteria. Peer reviewers are selected on the basis of submitted qualifications and are trained to evaluate applications.

PURPOSE

The purpose of this procedure is to detail the requirements and processes associated with the peer review of all applications that advanced from the Technical Review.

PROCEDURE

1. Develop the Call for Reviewers that includes the minimum and preferred qualifications for the CSP grant peer reviewers. In addition to the qualifications, the Call for Reviewers should include the timeline, payment and fee structure, conflict of interest, technology requirements, SAFE account, and vendor setup information.

- a. Develop template that includes contact information, professional associations, and request for resume.
 - b. Submit for leadership (Office Director, Executive Director, Legal office) and technical (Communications) review.
 - c. Revise based on feedback.
 - d. Publish on Department's website.
 - e. Generate statement for EdConnection, social media, gov delivery message to community school sponsors and community school superintendents.
 - f. Send published version to USDOE.
2. Enter a procurement request into the Fiscal SharePoint site (workflow) for grant readers (i.e. peer reviewers). The request will include the minimum and preferred qualifications of grant readers, a summary of requirements, amount requested and any other pertinent information.
 - a. The fiscal manager will review the request for completeness and accuracy. If the request contains all required information, the fiscal manager approves the request. If the request is lacking information, the fiscal manager will request additional information from the Office of Community Schools' grants manager.
 - b. If the request is approved by the fiscal manager, the procurement officer will complete the required review.
 3. Potential scorers complete the survey and upload their resume and conflict of interest statements via the survey tool.
 4. The department staff will review the resumes of individuals submitted as follows:
 - a. The Office of Community Schools' grants manager will select a team of department staff to review the resumes.
 - b. All individuals on the resume review team must be free of conflicts of interest and will submit disclosure forms prior to reviewing resumes.
 - c. OCS grants manager will assign resumes to teams of two staff to perform reviews.
 - d. Each team will review assigned resumes to ensure the minimum qualifications have been met.
 - e. If the resumes do not meet the minimum qualifications, they will be removed from consideration.
 - f. All remaining resumes will be reassigned and reviewed by review teams for the preferred qualifications.
 - g. All individuals meeting the minimum qualifications will be ranked by the number of preferred qualifications met.
 5. Determine the number of anticipated reviewers based on expected subgrant applications (minimum of four reviewers per application; minimum of 6 reviews per selected reviewer if the number of received applications allows)
 6. Notify the selected peer reviewers r.
 7. Verify that each reviewer has a SAFE account in order to access the CCIP to perform the reviews and instruct them to request the CCIP – ODE Grant Scorer role through the SAFE profile screen.
 8. As soon as possible following the closure of the subgrant application window, hold training for selected peer reviewers. The training should include:
 - a. Application overview
 - b. Technical Review overview
 - c. Scoring rubric review
 - d. Conflict of Interest process
 - e. Date of calibration application scoring discrepancy resolution call.
 9. Assign all reviewers to the calibration application in the CCIP and set due date.

10. Following the scoring deadline for the calibration application, engage Data Management staff to extract calibration application scores.
 - a. Review item scores to determine agenda for the discrepancy resolution call.
11. Hold scoring discrepancy resolution call to discuss individual scoring items for which there is more than a 2-point gap in reviewer scores.
12. Review scores and determine if any potential scorer should be removed due to extreme scoring tendencies.
13. Ensure all peer reviewers have submitted the Pre-Review Conflict of Interest Disclosure form before making assignments.
14. Engage Data Management staff to develop the initial peer reviewer assignment list:
 - a. Extract application data from the CCIP
 - b. Assign reviewer numbers to the selected peer reviewers
 - c. Use random number generator to assign a minimum of 4 reviewers to each application that was advanced through the Technical Review.
 - d. Verify potential conflicts of interest to ensure that assignments are made so that all reviewers are free of any conflicts.
 - e. Only reviewers who have completed training and scoring of the calibration application should be assigned to subgrant applications for scoring.
15. Assign reviewers to the individual applications in the CCIP via the user interface using the assignment list provided by Data Management staff.
16. The assigned peer reviewers will perform peer review on all subgrant applications that passed the technical review.
 - a. The review will be completed by a minimum of 4 peer reviewers.
 - b. The review will be completed in the CCIP.
 - c. Peer reviewers are required to indicate if a conflict of interest exists with an assigned subgrant application.
17. If a peer reviewer identifies a potential conflict of interest with an assigned application, use the CCIP interface to remove the reviewer and assign the next reviewer from the list provided by the Data Management staff.
18. Monitor the review process throughout the review window:
 - a. Contact reviewers who have not begun the process with reminders throughout the review window.
 - b. Reassign reviewers as appropriate to guarantee that each applicable application has been reviewed by a minimum of four reviewers by the close of the subgrant review window.
19. Require all peer reviewers to complete a Post-Review Conflict of Interest Disclosure form that is submitted to the department after the completion of the grant review window.

KEY RESPONSIBLE STAFF

The Office of Community Schools' grants manager is responsible for overseeing and coordinating all aspects of the Peer Review process.

TIMELINE

The Peer Review may begin as soon as the technical review has been completed, the appropriate subgrant applications have been identified, training has been completed and all assignments have been made in the CCIP

COMMUNICATION NEEDS

Communications is engaged for technical review of documents and for social media marketing.

DOCUMENTATION NOTE

Documents related to the Peer Review will be stored on the CSP SharePoint site in the appropriate folder structure:

- Additional documents related to the selection of peer reviewers
- Peer reviewer lists and other documents, including assignment file

E. SCORE ANALYSIS FOR NEW SUBGRANT APPLICATIONS

OVERVIEW/BACKGROUND

The Department will seek to fund the application(s) showing the most promise for meeting the primary goals of the program. Quality applications will be identified during the analysis of the scores following the peer review to determine a quality cut score for the subgrant competition. That cut score may vary across grant rounds ensuring that the department is awarding grants to quality applicants whose applications support the primary goals of this program.

PURPOSE

The purpose of this procedure is to detail the requirements and processes associated with the analysis of the peer review scores to determine the quality cut score.

PROCEDURE

1. After the peer review process has been completed, engage Data Management staff to extract the review scores for all scored applications. The list should include a row for each reviewer for each application. The data row should include the application number, but not the applicant name.
 - a. Translate raw data to appropriate rubric score (0, 1, 2 database entry may translate to 0, 5 and 10 points)
2. Perform analysis for each standard item of each scored application to determine the application score for the item. Standard items are all review items with the exception of those related to the competitive preference priorities. The application item score is calculated as follows:
 - a. If there is one, and only one score that results in a gap of two or more points from the closest score, the "outlying" score is removed from consideration and the remaining scores are averaged to determine the application's score for that item.
 - b. If there is not a single score resulting in a two-point gap, all scores for that item will be averaged to determine the application's score for that item.
3. Review the scores to determine a quality cut score that will be used in the selection process:

- a. Review the list to identify obvious breaks in the review scores (such a break often indicates a drop in the quality of the applications)
 - b. If there is a significant break in the review scores at a level near (above or below) 75 percent of the total available points, the quality cut score may be determined to be the lowest score immediately above the break.
 - c. If there is no significant break in the review scores at a level near (above or below) 75 percent of the total available points, the quality cut score may be determined to be the number representing 75 percent of the total available points.
4. Present the determined quality cut score and the process used to reach that score to the Data Governance Committee.
5. Review and re-calculate quality cut score as appropriate based on Data Governance Committee input.
6. Perform analysis for each review item related to the competitive preference priorities for each scored application to determine the application score for the item. The application item score is calculated as follows:
 - a. If there is one, and only one score that differs from the other three reviewers' scores for the item, the "outlying" score is removed from consideration and the remaining scores are averaged to determine the application's score for that item.
 - b. If there is not a single score that differs (all score the same or all 4 differ), all of the scores for that item will be included in the calculated average to determine the final score for that item.
7. For each scored application, calculate the total application score by adding the final scores for each individual item.
8. Sort the applications based on the total application score in descending order. In the event that two or more applications have the same total score, the ranking among those applications will be based on the sum of the final scores for the competitive preference priority items.

KEY RESPONSIBLE STAFF

The Office of Community Schools' grants manager provides oversight for the analysis process. He/she may engage Data Management staff as appropriate.

TIMELINE

The analysis of the review scores is completed immediately following the completion of the peer review process. It must be completed before final subgrant recipients may be selected.

COMMUNICATION NEEDS

All communication during this process is internal.

DOCUMENTATION NOTE

Documents related to the CSP Subgrant score analysis, including the original data files and any iterations generated during analysis, will be stored on the CSP SharePoint site in the appropriate folder structure

F. SCORING RUBRIC FOR CONTINUATION SUBGRANT APPLICATIONS

OVERVIEW/BACKGROUND

A CSP subgrantee may apply for continued funding if they were awarded either a Planning, Implementation or Expansion Year 1 subgrant. Continued funding is based on two components: Compliance Review and Continuation Application.

A rubric is used to record the results of the review and provide scoring information.

The rubric is reviewed annually prior to the publication of the Continuation Application.

PURPOSE

The purpose of this procedure is to detail the requirements and processes associated with the maintenance of the CSP Continuation Rubric in the CCIP.

PROCEDURE

1. After the Continuation Application has been finalized, review the previous CSP Continuation Rubric for required modifications.
2. Review the Compliance system requirements / monitoring protocol to determine if rubric modifications are needed.
3. Confer with Information Technology Office staff for development timeline for the Continuation Rubric in the CCIP.
4. Submit the final Continuation Rubric to the CCIP development staff for creation in the CCIP.
5. After the development staff has completed coding the Continuation Rubric into the CCIP, perform Quality Assurance to test the rubric in the QA environment for both content and technical accuracy.

KEY RESPONSIBLE STAFF

The CSP Continuation Rubric is maintained by the Office of Community Schools' grants manager. The technical development of the checklist is completed by assigned Information Technology Office staff.

TIMELINE

The development of the Continuation Rubric should begin as soon as the Continuation Application and compliance review criteria have been finalized. Allow a minimum of a month for development and quality assurance testing. The timeline will be determined through discussion with Information Technology Office staff.

COMMUNICATION NEEDS

No external communication is needed during the development of the Continuation Rubric.

DOCUMENTATION NOTE

Documents related to the CSP Continuation Rubric, and any other associated documents, will be stored on the CSP SharePoint site in the appropriate folder structure.

G. DEPARTMENT REVIEW FOR CONTINUATION APPLICATIONS

OVERVIEW/BACKGROUND

Department staff will conduct a review of each continuation application for eligibility for continued funding. If an application fails to meet any of the reviewed requirements, the OCS Grants Manager, in consultation with the OCS Director and Department leadership, will make a final eligibility decision. Applications deemed to be ineligible following the continuation review will not receive continued funding.

PURPOSE

The purpose of this procedure is to detail the requirements and processes associated with the review of all continuation applications received through the CSP Continuation Application.

PROCEDURE

1. Recruit Department staff to complete the continuation review.
 - a. The review should be completed by no less than 3 Department staff, including the Office of Community Schools' grants manager.
 - b. The review team should include someone from the Fiscal Office.
2. All department staff assigned to complete the continuation review must complete a conflict of interest disclosure prior to completing any reviews.
3. Train selected reviewers on the Continuation Rubric and expected documentation.
4. Perform a review on all continuation applications that have a status of *Authorized Representative Approved* as that status indicates that the application has moved through all required statuses to indicate submission by the applicant organization.
5. The review team will meet and come to consensus on the rating for each item in the Compliance component of the rubric.
6. The OCS grants manager will enter the consensus score for each compliance component item into the CCIP.
7. If the application met the eligibility requirements of the compliance component, the review team will continue with the application component of the continuation rubric. An applicant is deemed to meet the eligibility requirements of the compliance component if they meet one of the following:
 - a. An applicant that receives a "yes" rating on all 12 criteria will be deemed to have met the eligibility of the compliance component.

- b. An applicant that receives a “no” rating on one or more of the 12 criteria will be deemed to be ineligible for continued funding.
8. If the applicant did not meet the requirements of the compliance component, no additional review is necessary.
 - a. Hold the application for review of ineligibility at the time of award notice.
9. The review team will meet and come to consensus on the rating for each item in the application component of the rubric.
10. The OCS grants manager will enter the consensus score for each application component item into the CCIP.
11. Engage Data Management staff to extract the Review scores from the CCIP database.

KEY RESPONSIBLE STAFF

The Office of Community Schools’ grants manager is responsible for overseeing and coordinating all aspects of the Continuation Review. In addition, the Office of Community Schools’ grants manager will act as one of the reviewers for each applicable subgrant application.

TIMELINE

The Continuation Review may begin as soon as the grant window has closed.

COMMUNICATION NEEDS

All contact with the continuation review staff will be completed by the Office of Community Schools’ grants manager with input from the Office of Community Schools Director as needed.

DOCUMENTATION NOTE

Documents related to the Continuation Review, including the data files and any other associated documents, will be stored on the CSP SharePoint site in the appropriate folder structure.

H. SUBGRANT SELECTION

OVERVIEW/BACKGROUND

The Department will seek to fund the application(s) showing the most promise for meeting the primary goals of the program. All applications scoring at or above the quality cut score are considered eligible for funding depending on available funds; however additional special conditions may be attached to individual renewal subgrants based on their sponsor’s most recent evaluation results. Subgrant applicants who previously received a Planning, Implementation or Expansion Year 1 subgrant are eligible to receive a renewal grant for the next

phase of subgrant eligibility even if the sponsor received a rating lower than Effective on the most recent evaluation.

As part of the CSP grant competition, the Department created a CSP reserve fund that designates a portion of the grant funding for community school applicants located in school districts designated in academic distress. The final determination of available funding takes the CSP Reserve fund into consideration.

PURPOSE

The purpose of this procedure is to detail the requirements and processes associated with the selection of the final subgrant awardees.

PROCEDURE

1. Calculate the number of subgrants available to be awarded from the CSP Reserve in the current competitive subgrant competition using the following parameters:
 - a. Review subgrantees from previous year awards (NOTE: This step does not apply to the first subgrant competition)
 - i. Assume that planning subgrants awarded in the previous year will receive the maximum allowable amount of \$600,000 over a two-year period (expansion or implementation 1 and expansion or implementation 2)
 - ii. Assume that implementation 1 subgrants awarded in the previous year will receive the maximum allowable amount of \$250,000 for the upcoming grant year.
 - b. Assume that awarded planning subgrant applications will receive the maximum allowable amount of \$700,000 over a three-year period (planning, expansion or implementation 1 and expansion or implementation 2).
 - c. Assume that first-time awarded expansion or implementation subgrant applications for schools that will open in the upcoming school year will receive the maximum allowable amount of \$600,000 over a two-year period (expansion or implementation 1 and expansion implementation 2).
 - d. Assume that first-time awarded expansion or implementation subgrant applications for schools that opened in the current school year or the previous school year will receive the maximum allowable amount of \$250,000 over a one-year period (expansion or implementation 2).
2. Select CSP Reserve subgrants to be awarded from the ranked list generated through the Score Analysis process (those with a total score equal to or greater than the quality cut score).
 - a. Identify eligible applications qualifying for the CSP Reserve fund based on address. Engage Data Management staff as appropriate. Eligible applications are those with a total review score equal to or greater than the quality cut score identified during the Score Analysis process.
 - b. Select eligible applications to be awarded from the CSP Reserve funds in rank order until the available CSP Reserve funds have been allocated or there are no additional applications that scored at or above the quality cut score.
3. Calculate the number of general subgrants available to be awarded from the remaining (non-CSP Reserve) available funds using the parameters described in Step 1 above.

4. Select subgrants to be awarded from the ranked list generated through the Score Analysis process for new applicants (those with a total score equal to or greater than the quality cut score for new applicants).
 - a. Identify eligible applications. The list of eligible applications should include those that qualified for the CSP Reserve funds, but were not selected for award due to the funds availability. Engage Data Management staff as appropriate.
 - b. Select eligible applications to be awarded in rank order until the available funds have been allocated or there are no additional applications that scored at or above the quality cut score.
5. Review technical review scores and reviewer comments to identify any eligible subgrant application that requires a budget modification.
 - a. Contact applicable subgrant applicants to request a budget modification (make appropriate CCIP status changes to allow the applicant to make the required changes). Provide a deadline for modification submission.
 - b. Review budget modifications submitted by identified applicants.
6. Review the most recent sponsor evaluation results for previously awarded subgrantees. If the subgrantee's sponsor received a rating lower than Effective on the most recent evaluation:
 - a. Review the sponsor's approved corrective action plan
 - b. If the sponsor's deficiencies were related to oversight, develop a specialized monitoring plan for the subgrantee covering the sponsor's area(s) of deficiency.
7. Review the final selection results with the Office of Community Schools' director for sign-off.
8. Request the Data Governance Committee review the selection process to ensure consistency of procedures.

KEY RESPONSIBLE STAFF

The Office of Community Schools' grants manager is responsible for overseeing the subgrant selection process. He/she may engage Data Management or other Department staff as appropriate.

TIMELINE

The selection process may be completed immediately following score analysis. The selection process must be completed prior to announcing awards.

COMMUNICATION NEEDS

It is critical that all communication regarding the selection process remain confidential until awards have been announced.

DOCUMENTATION NOTE

Documents related to the CSP Subgrant selection process, including all data files used in the process and any notes regarding calculations, will be stored on the CSP SharePoint site in the appropriate folder structure .

I. AWARD ANNOUNCEMENT

OVERVIEW/BACKGROUND

The Department will seek to fund the application(s) showing the most promise for meeting the primary goals of the program. After the selection process has been completed and any required subgrantee budget modification have been submitted and reviewed, the Department will notify all applicants of the disposition of their subgrant application.

PURPOSE

The purpose of this procedure is to detail the requirements and processes associated with the notification and announcement of the final subgrant awardees.

PROCEDURE

1. Generate award letter from the superintendent of public instruction to each applicant that is awarded a subgrant. The letter should include the substantially approved date, which is the first date on which subgrantees can begin to utilize subgrant funds. If the subgrantee has special conditions attached to their grant award based on their sponsor's most recent evaluation rating, the award letter must include that information.
2. Send the award letter to each awarded subgrantee via email to the contact(s) listed in the application.
3. Update the application status in the CCIP to reviewed or the system approval status. This action will activate the grantee in the CCIP and will generate a history log entry that includes the substantially approved date.
4. Work with Communications' staff to publish the final list of subgrantees on the CSP Grant page of the Department's website.
5. Work with executive leadership and Communications to determine if a press release is warranted for the awarded subgrantees.

KEY RESPONSIBLE STAFF

The Office of Community Schools' grants manager is responsible for overseeing the subgrant selection and award process.

TIMELINE

The grant notification and publication of awarded subgrantees may be completed immediately following final subgrant selection.

COMMUNICATION NEEDS

Engage Communications to provide technical edits to drafted documents and develop press release information if needed.

DOCUMENTATION NOTE

Documents related to the CSP Subgrant award announcement process, including the final award list, will be stored on the CSP SharePoint site in the appropriate folder structure

PROCESS

Disposition of Appeals

OVERVIEW/BACKGROUND

The subgrant applicant may appeal the disposition of the submitted application.

PURPOSE

The purpose of this procedure is to detail the requirements and processes associated with the subgrant applicant's right to request a secondary technical review to re-determine the original disposition.

PROCEDURE

1. A CSP subgrantee may submit a request for a secondary technical review of a specified area of concern, within 14 business days of receiving an official letter of denial.
2. The Department will notify the applicant in writing of receipt of the said request.
3. The Department will review the specified area of technical review to determine if an alternate disposition will be made.
4. The applicant will be notified if an alternate disposition has been made and a letter of determination will be sent to the applicant.
5. If an approval has been determined, update the application status in the CCIP to reviewed or the system approval status. This action will activate the grantee in the CCIP and will generate a history log entry that includes the substantially approved date.

KEY RESPONSIBLE STAFF

The Office of Community Schools' grants manager and Director is responsible for overseeing the subgrant appeal process.

TIMELINE

The grant notification and publication of awarded subgrantee may be completed immediately following appeal review.

COMMUNICATION NEEDS

Engage Communications to provide technical edits to drafted documents and develop press release information if needed.

DOCUMENTATION NOTE

Documents related to the CSP Subgrant award disposition process, including the final determination letter, will be stored on the CSP SharePoint site in the appropriate folder structure

PROCESS

Processing of Subgrantee Payments

OVERVIEW/BACKGROUND

Following a supplemental review by the U.S. Department of Education, The U.S. Department of Education attached special conditions to the CSP Grant awarded to the Ohio Department of Education (the Department). High-Risk Special Condition 1 placed the Department on route payment which requires that all payment requests be routed to the U.S. Department of Education program office for approval prior to requested funds being released. This special condition requires the Department to deviate from its standard payment processing procedures used for other federal and state grants. Reimbursement requests will be accepted and processed twice a month rather than daily as they are for other grants. This will allow for the extensive internal and U.S. Department of Education review required as part of the process.

CSP subgrants are managed through the Comprehensive Continuous Improvement Plan (CCIP), the Department's e-Grants system. The CCIP provides tracking and communication tools throughout the life of the grant.

The CSP Grant is a reimbursement grant. As such, no requests for advances will be considered. Subgrantees are required to submit a Project Cash Request (PCR) with proper documentation for each expense for which they are requesting reimbursement.

All CSP Grant subgrant will be classified as high-risk, which requires every submitted PCR to be reviewed prior to processing the payment.

PURPOSE

The purpose of this procedure is to describe the requirements and process used when processing subgrantee requests for payment. Detailed information regarding overall financial administration of the grant can be found in the attached CSP Fiscal Management Plan.

PROCEDURE

1. The subgrantee utilizes the CCIP to submit a PCR using the steps outlined in documentation available in the [CCIP Document Library](#).
 - a. Subgrantees may enter a PCR at any time; however, payment requests will be processed twice a month beginning on the first business day following the 15th and the last day of each month.
 - b. The subgrantee must attach supporting documentation for each expense for which reimbursement is being requested. Beginning July 1, 2018, subgrantees must

- submit the governing authority minutes or signed resolution approving the CSP subgrantee proposed budget and budget revisions with all PCRs.
- c. The request is officially submitted to the Department only when the Fiscal Representative has changed the status of the request to *Fiscal Representative Approved*.
2. On the first business day after the 15th and last day of each month, the Department Grants Payment & Analysis senior financial analyst (analyst) reviews and approves each payment request to ensure claims are for budgeted allowable expenses and are within the grant period.
 - a. If the request is incorrect, contains unallowed expenses, or does not include sufficient documentation, the analyst returns the request to the subgrantee for revision. The analyst notates the reason for return in the History Log.
 - b. The analyst consults with the Office of Community Schools' grants manager as needed when a requested reimbursement is in question.
 3. The analyst forwards all PCRs that pass the review to the Grant Administrator (GA).
 4. The GA will submit the PCR request with all documentation to Project Director for a final determination on the request of funds.
 - 5.
 6. The analyst approves the PCR in the CCIP.
 7. Normal automated payment processing, as defined in the CSP Fiscal Management Plan, is completed to generate the approved payment in OAKS.

KEY RESPONSIBLE STAFF

The Department Grants Payment & Analysis Senior Financial Analyst (analyst) is the primary responsible party in the subgrantee payment process. He/she will engage other fiscal and program staff as needed and appropriate.

TIMELINE

The payment review and approval process will begin on the first business day following the 15th and the final day of each month. It is anticipated that the full payment process will take approximately 8-10 business days.

COMMUNICATION NEEDS

The CCIP History Log is the primary method of communication used during the payment processing procedures.

DOCUMENTATION NOTE

Subgrantees will submit all PCRs and associated documentation through the CCIP. In the event that file containing the payment supporting documentation is too large to upload to the CCIP, the subgrantee will email the supporting documentation to the analyst.

CSP SUBGRANTEE ADHERENCE TO PROGRAM REQUIREMENTS

OVERVIEW

Pursuant to High-Risk Special Condition #5 of the U.S. Department of Education's CSP grant award notice to the Ohio Department of Education, the Department must develop a comprehensive plan for administering the CSP grant that includes a description of the systems and processes the Department will implement to ensure that CSP subgrantees adhere to all program requirements and terms of their approved applications. The Department's overall process for ensuring subgrantee adherence utilizes the Department's compliance system and consists of five monitoring components:

- A. On-going fiscal monitoring,
- B. On-going monitoring by sponsors,
- C. Fall desk review,
- D. Spring site visit, and
- E. Annual grant activities report.

At any point in the five monitoring components, if the Department or sponsor determines that a subgrantee is not adhering to the requirements of the CSP grant, the non-compliant issue must be immediately rectified through a corrective action plan. Strong communication among the Department, the CSP subgrantee, and the sponsor is critical to ensuring compliance and adherence to terms of the approved CSP application. Therefore, all monitoring reports and corrective plans are simultaneously shared with the CSP subgrantee and its sponsor.

Depending upon the type of grant received (planning, implementation or expansion), one of two rubrics will be used during the fall desk review and spring site visit. Both rubrics are designed to ensure the educational programs are being developed or implemented with fidelity, operational benchmarks are being met and all fiscal controls are in place.

To secure a strong, effective and efficient system of oversight, the Department's monitoring process and related rubrics and protocols will be annually updated to incorporate changes in state and federal legislation, CSP grant requirements and lessons learned over the course of the previous year's implementation or expansion.

A. ON-GOING FISCAL MONITORING

To ensure all expenses are allowable and within the subgrantee's budget, all CSP subgrantees will be paid on a reimbursement basis. This on-going fiscal monitoring is described in the process for subgrantee payments.

2. ONGOING MONITORING BY SPONSORS

PURPOSE:

Under Ohio law, sponsors are required to monitor the community schools they authorize twice a year. It is often through sponsor oversight where first instances of non-compliance are identified. Sponsors will be required to communicate the results of their monitoring with the school and the Department. If non-compliance issues are identified, the sponsor will work with the school to either immediately rectify the compliance issue or to develop a corrective action that will quickly lead to compliance. Data from sponsor monitoring will be used during the fall desk review and spring site visit.

PROCEDURE:

1. Twice a year, sponsors will complete their statutorily required monitoring.
2. The sponsor will immediately inform the Department if a subgrantee should be found to be non-compliant on applicable laws and rules and/or contract terms.
3. In instances where compliance issues are identified, the sponsor will work with the school to either immediately rectify the compliance issue or to develop a corrective action that will quickly lead to compliance.
4. In November and February approximately, each subgrantee will upload a copy of the most recent site-visit report provided to the subgrantee's governing board into the compliance system.
5. The Office of Community Schools' grants manager will follow up with sponsors and schools on all instances of non-compliance and will document all subgrantee actions in the compliance system.
6. All Sponsor CAP evidence of implementation will be reviewed by the grant manager, director, and center leadership to further determine eligibility.
7. In early fall, train subgrantees and sponsors on the expectations for sponsor monitoring reporting, as it applies to the CSP grant.

KEY RESPONSIBLE STAFF:

- Office of Community Schools' grants manager
- Sponsor

TIMELINE:

The Department will train sponsors in late summer (July/August) on their requirements of monitoring the CSP grant. Sponsors must complete and submit their sponsoring results to the Department generally by the end of October and the end of February. Data collected from sponsor monitoring will be used in the fall desk review (November approximately) and the spring site visit (March approximately).

COMMUNICATION NEEDS:

Subgrantees will need to be given direction on where to upload their sponsor's formal site-visit reports when providing them to the Department.

DOCUMENTATION NOTE:

The sponsor monitoring reports for subgrantees will be uploaded into the compliance system.

C. FALL DESK REVIEW

PURPOSE:

All subgrantees will be monitored for fiscal and programmatic grant compliance specific to the CSP grant through a desk review in the fall (approximately November). Schools will upload documentation and provide narrative descriptions of how their grant programs are implemented with fidelity, how their operational benchmarks are being met, financial controls they use to successfully manage the grant program, and provide evidence of alignment between their expenditures and the goals and objectives specified in the subgrantee's CSP application. All indicators in the desk review are in the CSP planning evaluation rubric or the CSP expansion and implementation rubric. Department staff will review the materials and narratives completed by the subgrantees, as well as the data collected from the sponsor monitoring, and will determine the subgrantee's compliance on each indicator on the rubric. The Department will conduct follow-up phone calls with the subgrantee if clarity is needed on the narrative responses or if additional documentation is needed to accurately determine compliance. Data collected from the fall desk review will inform the spring site visit. Schools with identified non-compliance or deficiencies in grant implementation or expansion during the fall desk review are subject to unscheduled pop-in site visits, in addition to the scheduled spring site visit.

PROCEDURE:

1. Subgrantees will be notified in early fall of their requirement to upload documentation, including narrative descriptions of their fiscal activities and grant implementation/expansion, into the compliance system.
2. Department monitoring staff will review the grant application, the information entered into the compliance system by the subgrantee, the most recent sponsor monitoring report and any existing corrective action plans (if applicable).
3. The Department monitor will compare all of the data reviewed against the indicators in the monitoring protocols (e.g., planning evaluation rubric or implementation/expansion rubric). The monitor will determine if the subgrantee is compliant on each indicator and provide summary evidence to support the determination.
4. Once completed, the results of the fall desk review are shared with the subgrantee and its sponsor.
5. If the subgrantee is found to be non-compliant or deficient on any required items, the subgrantee must provide information on why it is non-compliant and how it plans to become compliant on those issues. The sponsor will work with the school to either immediately rectify the compliance issue, or to develop a corrective action that will quickly lead to compliance.
6. The subgrantee has 30 days to correct all deficiencies. Failure to correct all deficiencies within the 30 days may result in early termination of the subgrantee's award, and depending upon the circumstances, the Department may pursue necessary actions to reclaim previously distributed funds.

7. Office of Community Schools' staff will continually monitor the subgrantee's progress in reaching full compliance.

KEY RESPONSIBLE STAFF:

- Office of Community Schools' grants manager
- Any additional staff hired and/or assigned to work on the CSP grant

TIMELINE:

Subgrantees must upload documentation and narratives in late November/December. Office of Community Schools' staff will complete the desk review in December/January.

COMMUNICATION NEEDS:

A detailed description of the fall desk review, a template of narrative questions, a list of required documents for upload and copies of the rubrics (planning evaluation, implementation, and expansion) will be provided to subgrantees through training and will be available on the Department's website.

DOCUMENTATION NOTE:

A detailed description of the fall desk review, a template of narrative questions, a list of required documents for upload, the planning evaluation rubric and the implementation/expansion rubric will be stored on the CSP Grant SharePoint site in the Monitoring Protocol folder.

D. SPRING SITE VISIT

PURPOSE:

In order to ensure that the subgrantee is adhering to all program requirements as well as to the terms specified in its approved grant application, the Department will conduct at least one scheduled comprehensive site visit in the spring of each year. During the site visit, Department staff will interview school staff and governing board members, review a subset of financial documents, and gather any other data necessary to complete the planning evaluation, implementation or expansion rubric. The Department will use formal protocols to collect the data necessary to complete the rubrics. At the end of the site visit, Department staff will meet with school officials to briefly discuss the overall findings. Schools will receive official site visit feedback (completed planning evaluation, implementation or expansion rubric) within 30 days of the site visit and will have 30 days to correct all deficiencies.

PROCEDURE:

1. No later than February 28th of each year, the office of community schools' staff will contact the subgrantee to schedule a site visit. All site visits will be concluded by April 30th of each year. The subgrantee's grant manager, governing board members and other school staff members are expected to be at the school and/or available for interviews during the site visit.
2. While scheduling the site visit, Office of Community Schools will notify the grantee of the requirement to upload documentation and complete narrative descriptions of their fiscal activities and grant implementation prior to the visit. Uploads into the compliance system must be completed by the subgrantee at least one week prior to the site visit.
3. Prior to visiting the subgrantee, Department monitoring staff will review the information uploaded into the compliance system by the subgrantee, the grant application, the most recent sponsor monitoring report, the fall desk review, and any existing corrective action plans (if applicable).
4. On the day of the site visit, the Office of Community Schools monitors will use formal protocols to gather additional data.
5. At the end of the site visit, Department staff will meet with school officials to briefly discuss overall findings. Subgrantees must receive official site visit feedback within 30 days.
6. Once back at the Department, the Office of Community Schools' monitoring team will draft the official site visit report and circulate the draft with the Department's executive leadership and legal staff prior to finalizing the report.
7. Once approved by the Department's leaderships, the final site visit report will be shared with the subgrantee and its sponsor. (This must be within 30 days of the visit.)
8. If the subgrantee is found to be non-compliant or deficient on any required items, the subgrantee must provide information on why it is non-compliant and how it plans to become compliant on those issues. The sponsor will work with the school to either immediately rectify the compliance issue or to develop a corrective action that will quickly lead to compliance.
9. The subgrantee has 30 days to correct all deficiencies. Failure to correct all deficiencies within the 30 days may result in early termination of the subgrantee's award, and depending upon the circumstances, the Department may pursue necessary actions to reclaim previously distributed funds.
10. Office of Community Schools staff will continually monitor the subgrantee's progress in reaching full compliance.

KEY RESPONSIBLE STAFF:

- Office of Community Schools' grants manager
- Any additional staff hired and/or assigned to work on the CSP grant

TIMELINE:

Subgrantees must upload documentation and narratives in early March. Office of Community Schools' staff will complete the site visit by April 30th.

COMMUNICATION NEEDS:

A detailed description of the spring site visit, a template of narrative questions, a list of required documents for upload and copies of the rubrics (planning evaluation, implementation or expansion rubric) will be provided to subgrantees through training and will be available on the Department's website.

DOCUMENTATION NOTE:

A detailed description of spring site visit, a template of narrative questions, a list of required documents for upload, copies of the rubrics (planning evaluation, implementation or expansion rubric) and all interview/document review protocols will be stored on the CSP Grant SharePoint site in the Monitoring Protocol folder.

E. ANNUAL GRANT ACTIVITIES REPORT

PURPOSE:

One means of evaluating the success of the CSP grant is by requiring subgrantees to file final grant activities reports within 90 days of the end of the budget period. At a minimum, subgrantees must report on each of their project goals, including data and information that support the outcome of each goal, and provide a detailed expenditure report and a property inventory of all equipment and non-consumable goods purchased with CSP grant funds. The Department requires a specific format for the expenditure and inventory reports and ensures that the project goals and outcomes are those specified in the grant.

PROCEDURE:

1. The Department will alert subgrantees in June to submit an annual activities report by Sept. 30. This alert will include emailing each subgrantee a copy of the report template for progress towards meeting subgrant goals. The subgrantee must submit a final expenditure report in the CCIP as of September 30 regarding all subgrant expenditures.
 - a. The annual activities report must include an inventory control list of all equipment purchased with CSP funds. The inventory must comply with federal requirements.
2. Subgrantees will upload a copy of their annual grant activities report into the compliance system by the specified deadline.
3. The Office of Community Schools' grants manager and other Office of Community Schools' staff assigned to work on the CSP grant will confirm with the subgrantee that the Department has received the report.
4. The Office of Community Schools' grants manager and other Office of Community Schools' staff assigned to work on the CSP grant will review each subgrantee's annual grant activities report. Office of Community Schools' staff must do one of the following:
 - a. Inform the subgrantee that the report is acceptable and that it is compliant with this grant assurance;
 - b. If the report is incomplete, inform the subgrantee that it is non-compliant and communicate exactly what documentation is missing and when revisions are due to the Department. Repeat step four until the subgrantee is compliant.
5. Work with the communications to post the reports on the Department's website.

KEY RESPONSIBLE STAFF:

Ohio CSP Grant: Comprehensive Plan (Revised April 15, 2021)

- Office of Community Schools' grants manager
- Any additional staff hired and/or assigned to work on the CSP grant
- Communication's staff

TIMELINE:

Subgrantees must upload their annual grant activities report into the compliance system by Sept. 30.

COMMUNICATION NEEDS:

The reporting template that specifies the format for the expenditure and inventory reports and an explanation of what must be reported on each project goal will be provided to grantees during training, and will be available on the Department's website.

DOCUMENTATION NOTE:

The reporting template for the annual grant activities report will be stored on the CSP Grant SharePoint site in the Monitoring Protocol folder.

CORRECTIVE ACTION FOR NON-COMPLIANCE

PURPOSE:

At any point in the monitoring and oversight of the CSP grant, it may be determined by the sponsor or by the Department that the subgrantee is not adhering to state/federal laws or grant assurances. Any non-compliance issues need to be immediately rectified through a corrective action plan.

PROCEDURES:

1. When the subgrantee is identified by the Department as being non-compliant with any CSP program requirement, the school and sponsor are notified within 25 business days. When the sponsor identifies non-compliance and places its community school on a corrective action plan, the school and the Department are notified within 5 business days of the corrective action plan requirements.
2. The subgrantee must provide information to the Department on why it is non-compliant and how it plans to become compliant on those issues. The community school will develop a corrective action plan using the deficiencies outlined in the notification letter.
3. A corrective action plan is documented in the compliance system.
4. Office of Community Schools' staff will continually monitor the subgrantee's progress in reaching full compliance.
5. The subgrantee has 30 days to correct all deficiencies.
6. Failure to correct all deficiencies within the 30 days may result in early termination of the subgrantee's award, and depending upon the circumstances, the Department may pursue necessary actions to reclaim previously distributed funds.

KEY RESPONSIBLE STAFF:

- Office of Community Schools' grants manager
- Any additional staff hired and/or assigned to work on the CSP grant

TIMELINE:

Corrective action for non-compliance may occur at any time throughout the grant period.

COMMUNICATION NEEDS:

Issues of non-compliance uncovered by the Department will be communicated to the subgrantee and its sponsor; issues uncovered by the sponsor will be communicated to the subgrantee and the Department. All corrective action plans will be kept in the compliance system.

DOCUMENTATION NOTE:

The rules for non-compliance will be stored on the CSP Grant SharePoint site in the Monitoring Protocol folder.

PLANNING EVALUATION RUBRIC

PURPOSE:

The CSP Planning Evaluation Rubric will be used to monitor subgrantees and to measure the state's performance in expanding the number of high-quality community schools available to students in Ohio.

FOCUS AND SCORING OF THE PROTOCOL:

The rubric will be built into the Department's compliance system and will monitor three areas: 1) performance on goals and objectives, 2) fiscal accountability, and 3) programmatic compliance. Each area on the protocol will include multiple criteria (indicators) for evaluating the subgrantee's performance in implementing the CSP grant.

Because the Department will be using the data from this monitoring rubric to measure Ohio's performance on the CSP grant, a numeric score will be attached to each indicator.

Measure	Target
1.3 The percent of eligible proposed schools awarded a CSP planning	80 percent of awarded subgrantees earn 75 percent or more total

<p>subgrant that earn 75 percent or more total points on the plan evaluation rubric that measures successful planning activities.</p>	<p>points on the plan evaluation rubric.</p>
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Each indicator will be scored as "compliant" (1 point), "not compliant" (zero points), or "not applicable." If an indicator is "not applicable," it will not count toward the school's total possible points.

The percentage of total points possible on the rubric is for the purpose of holding Ohio accountable for the CSP grant. When holding subgrantees accountable for the CSP planning grant, the focus will be on each indicator. Subgrantees must immediately address any issues of non-compliance at the time they are discovered (e.g., ongoing fiscal monitoring, fall desk review or spring site visit). The Department has the discretion to conduct pop-in site visits and/or additional desk reviews if numerous non-compliance issues are identified during the fall desk review.

IMPLEMENTATION RUBRIC

PURPOSE:

The CSP Implementation Rubric will be used to monitor subgrantees and to measure the state's performance in expanding the number of high-quality community schools available to students in Ohio.

FOCUS AND SCORING OF THE PROTOCOL:

The rubric will be built into the Department's compliance system and will monitor four areas: 1) performance on goals and objectives, 2) fiscal accountability, 3) programmatic compliance, and 4) quality practices. Each area on the protocol will include multiple criteria (indicators) for evaluating the subgrantee's performance in implementing the CSP grant. The first three areas will be evaluated in the fall desk review and during the spring site visit. The fourth area, quality practices, will only be evaluated in the spring site visit.

Because the Department will be using the data from this monitoring rubric to measure Ohio's performance on the CSP grant, a numeric score will be attached to each indicator.

Measure	Target
2.2 Percentage of schools that	80 percent of schools score 80 percent or more total

<p>open under the CSP grant that score 80 percent or more total points on the application rubric.</p>	<p>points on the implementation rubric.</p>
<p>2.3 Percentage of schools opened under the CSP grant that show improvement in their scores on the quality practices area of the CSP subgrant implementation rubric.</p>	<p>100 percent of schools that did not receive all points on the quality practice area of the rubric show improvement in that area.</p>

The first three areas in the rubric relate to the subgrantee's compliance with the grant requirements; these indicators will be scored as "compliant" (1 point), "not compliant" (zero points), or "not applicable." The fourth area relates to quality community school practices; indicators in this section will be scored "met" (1 point), "in progress" (one-half point), "not met" (zero points), or "not applicable." If an indicator is "not applicable," it will not count toward the school's total possible points.

The percentage of total points possible on the rubric is for the purpose of holding Ohio accountable for the CSP grant. When holding subgrantees accountable for the CSP implementation grant, the focus will be on each indicator. Subgrantees must immediately address any issues of non-compliance at the time they are discovered (e.g., ongoing fiscal monitoring, fall desk review or spring site visit). The Department has the discretion to conduct pop-in site visits and/or additional desk reviews if numerous non-compliance issues are identified during the fall desk review. If the Department finds that the subgrantee is not implementing quality practices, it will need to progress toward these quality practices to receive continued funding.

THE DEPARTMENT'S COMPLIANCE SYSTEM

PURPOSE:

While the grant, the payment processing and ongoing fiscal monitoring rely upon the CCIP, the fall desk review, the spring site visit and corrective action plans will be contained within the Department's current compliance monitoring system. This electronic monitoring system allows agency teams to review criteria specific to their program but also allows status, testing and

corrective action to be shared agency wide. In addition, allowing both the state teams and the subgrantees to upload financial and programmatic support documentation, the system allows offices to provide and track technical assistance. For the purpose of CSP, subgrantees will log into the compliance system when entering required information for the desk review, spring site-visit and annual grant activities report. The monitoring protocols are built into the Department's compliance system.

PROCEDURE:

1. Using the planning evaluation, implementation or expansion rubric rubrics as the basis, develop and enter into the compliance system the questions and information required from the subgrantee.
2. Provide the subgrantee will the following information:
 - a. Procedures for setting up a SAFE account and logging into the compliance system;
 - b. A training (webinar and manual) on how to use the compliance system;
 - c. A timeline indicating by which dates various compliance information is required to be entered into the compliance system.
3. During the fall desk review and before the spring site visit, the Office of Community Schools' staff must review information entered into the compliance system by the subgrantee, comparing the data against the indicators in the monitoring protocols. Indicate Office of Community Schools' staff findings and ratings on the designated tab in the compliance system.
4. If the subgrantee is found to be non-compliant or deficient on any required grant assurances, require the subgrantee to provide information on why it is non-compliant and how it plans to become compliant on those issues. Extensive or continual non-compliance may require a corrective action plan.
5. Office of Community Schools' staff will continually monitor the subgrantee's progress in reaching full compliance.

KEY RESPONSIBLE STAFF:

- Office of Community Schools' grants manager
- Any additional staff hired and/or assigned to work on the CSP grant
- Information Technology Office staff

TIMELINE:

The indicators in the planning evaluation rubric, implementation or expansion rubric must be built into the compliance system; any edits to the protocols will require updates to the system. Subgrantees will enter required data into the compliance system at least three times a year (fall desk review, spring site visit and annual grant activities report), with increased frequency possible for those demonstrating extensive or continual non-compliance.

COMMUNICATION NEEDS:

The Department will develop an instruction manual on how to use the compliance system. This will involve some technical editing from Communications.

DOCUMENTATION NOTE:

Any CSP grant-related documents and materials are posted on the CSP Grant webpage of the Department's website.

ANNUAL REVIEW AND UPDATE OF THE MONITORING PROCESS AND PROTOCOLS

PURPOSE:

To ensure a strong, effective, and efficient system of oversight, the Department's monitoring process and related rubrics and protocols must be annually updated to incorporate changes in state and federal legislation, CSP grant requirements and lessons learned over the course of the previous year's implementation/expansion.

PROCEDURES:

1. Office of Community Schools' staff must continually work with legislative and legal staff to review the most recent state and federal legislative language to correctly interpret the law and to determine if any modifications are needed for the monitoring protocols.
2. Office of Community Schools' staff must create a running list of the legislative updates so that there is a historical reference document, including effective dates of law.
3. Consult with the federal programs officer of the CSP grant to determine if any updates or changes to the CSP grant requirements are needed.
4. Determine if any legislative changes need to be communicated to CSP subgrantees immediately. If so, contact the subgrantees.
5. Review all of the protocols, forms and documents related to the CSP grant, making note of the areas requiring an update or change based on legislation.
6. Office of Community Schools' staff will collect data on the rollout of the monitoring process and rubrics in the first year of the grant, examining the quality of data, missing data, redundancy in data collection, burdensome reporting and accuracy of the rubrics.
7. Post on the CSP Grant webpage of the Department's website any protocols or documents that were updated based on legislative changes.

KEY RESPONSIBLE STAFF:

- Office of Community Schools' grants manager
- Any additional staff hired and/or assigned to work on the CSP grant
- Legal staff
- Legislative staff

TIMELINE:

State and federal laws should be reviewed at least annually. However, the frequency of the legislative review may be subject to change depending on when laws are enacted and which program requirements are affected. The review of the monitoring protocol and processes should occur at the end of each fiscal year. The timeline may need to be modified should immediate changes in state or federal laws regarding education and/or the CSP grant take place.

COMMUNICATION NEEDS:

Any legislative or policy changes to the CSP grant requirements are posted on the CSP Grant webpage of the Department's website. A description of the monitoring process and the monitoring protocols will be available on the CSP grant webpage of the Department's website. If an updated version needs to be uploaded, the link on the webpage will make note of the revision date. Most of the communication regarding the annual review of the process, the protocol, and legislative changes will be internal. The Communications Office will be needed for technical editing if updates are posted on the website.

DOCUMENTATION NOTE:

The monitoring protocols and any modified versions of it are stored on the CSP Grant SharePoint site in the Monitoring Protocol folder.

THE DEPARTMENT'S ADHERENCE TO PROGRAM REQUIREMENTS

OVERVIEW

As part of the strategy to ensure all CSP subgrantees adhere to all program requirements as well as the terms of the applications they submit, the Department will institute a process for ensuring that it maintains adherence to all program requirements for which the agency is responsible. The Department will manage its adherence to all requirements of the CSP grant through the following processes:

- A.** Any Special and high-risk conditions for the Ohio grant (if applicable);
- B.** Quarterly, semi-annual and annual performance reports
- C.** Grant Implementation Advisory Committee;
- D.** Working with the U.S. Department of Education;
- E.** Independent monitor;
- F.** Semi-annual submission of itemized budget;
- G.** USED Site visits and monitoring corrective actions (as applicable)

A. ANY SPECIAL AND HIGH RISK CONDITIONS FOR THE OHIO GRANT (IF APPLICABLE)

PURPOSE

To ensure that the Department takes care of successfully completing or meeting all the special conditions outlined by the U.S. Department of Education as part of the Department's requirements in administering the CSP grant.

PROCEDURE

1. Review and compare the most recent continuation grant award notice from the U.S. Department of Education within 10 business days of receipt of the notice to review the current conditions on Ohio's CSP grant. Current high-risk and special conditions are as follows:
 - a. High risk conditions:
 - i. On route payments;
 - ii. Independent monitor;
 - iii. Performance reports (quarterly and semi-annual);
 - iv. Grant Implementation Advisory Committee;
 - v. Comprehensive plan;
 - vi. Monitoring protocol;
 - vii. Centralized list of community schools; and

- viii. Dropout prevention and recovery community school prohibition.
 - b. Special conditions:
 - i. Revising the Department’s CSP SEA grant budget;
 - ii. Reduction of continuation amounts;
 - iii. Continual periodic review and evaluation of sponsor quality;
 - iv. Definition of “high-quality charter school”; and
 - v. Pre-approval needed from the U.S. Dept. of Education for weighted lotteries.
2. Determine the person(s) at the Department (e.g., Office of Community Schools, fiscal, etc.) responsible for ensuring that each special and/or high-risk condition is completed.
 3. Implement the necessary procedures for carrying out each special and/or high-risk condition.
 4. Create and maintain a document that shows the status of each special and/or high-risk condition as well as what has been done (or is being done) to meet it. This may include specifying where special and/or high risk conditions are in other CSP grant-related documents and processes.
 5. Keep the U.S. Department of Education updated on the Department’s progress in meeting the special and/or high risk conditions.
 6. If needed, modify any processes pointed out in feedback from the U.S. Department of Education regarding the special and/or high risk conditions.

KEY RESPONSIBLE STAFF

- CSP project director
- Office of Community Schools’ grants manager
- Department fiscal staff (as needed)
- Other Department staff (as needed)

TIMELINE

All special and high-risk conditions are in force during the entire grant cycle, which technically ends in 2020, or until removed by the U.S. Department of Education. However, it is possible that the Department will submit a request for a “no cost” extension to allow some subgrantees to carry out their implementation/expansion grants over a period of two years.

COMMUNICATION NEEDS

Some special conditions require that specific documents or information be made available to the public. Such items will be posted to the CSP Grant webpage on the Department’s website. In general, however, the Department’s progress in meeting the provisions of the special conditions will be primarily internal and subject to modification based on feedback from the U.S. Department of Education.

DOCUMENTATION NOTE

The document indicating the status of each special condition, as well as any other documents regarding the special conditions, are stored on the CSP SharePoint site in the appropriate folder structure (i.e., Program Requirements).

B. QUARTERLY, SEMI-ANNUAL AND ANNUAL PERFORMANCE REPORTS

PURPOSE

To ensure the Department submits quarterly, semi-annual and annual performance reports to the U.S. Department of Education, the independent monitor and the general public as required by the high-risk special conditions outlined by the U.S. Department of Education.

PROCEDURE

1. The CSP project director reviews the most recent continuation Grant Award Notice from the U.S. Dept. of Education to determine all the information that must be included in the quarterly reports.

The quarterly reports, due Jan. 1, April 1, July 1, and Oct. 1 each year, must include all CSP grant activities and expenditures, including the following:

- a. Updates on grant project timelines;
- b. Updates on the timeline for implementing the Authorizer Quality Performance Review, and how the implementation impacts the grant budget; and
- c. Updates on audit findings and resolutions of audits involving community schools in Ohio, including the sponsors' responsibilities and involvement.

The semi-annual reports, which are the Jan. 1 and July 1 reports, must include the preceding information, as well as the following:

- a. A report on all obligations, expenditures, revenues and activities under the grant;
- b. A listing of the specific entities awarded CSP subgrants and the subgrant amounts;
- c. The name of each subgrantee's sponsor;
- d. A description of the process by which subgrantees were selected for funding, including the evaluation criteria and scores, as well as comments from the peer reviewers; and
- e. Other information deemed necessary by the U.S. Department of Education to ensure public transparency and accountability regarding the Department's CSP grant program.

The semi-annual reports also must be made available to the public and reviewed by the independent monitor.

The annual performance reports are due April 1 each year and must provide progress updates on the Department's project-specific performance measures and targets tied to grant activities and student academic achievement as well as the following:

- a. Cover page;
 - b. Executive summary;
 - c. Project status chart;
 - d. Budget narrative;
 - e. Additional information and
 - f. Data collection form.
2. The CSP project director meets with the Office of Community Schools' grants manager to discuss progress made on the special conditions and what needs to be included in the quarterly report.
 3. The Office of Community Schools' grants manager develops an outline for the quarterly report. The outline should include each topic/section to be included in the report.
 4. The Office of Community Schools' grants manager writes the draft of the quarterly report, making sure that all required information is included in the draft.
 5. The Office of Community Schools' grants manager distributes the draft to CSP project director, senior staff and Legal Counsel for review.
 6. The Office of Community Schools' grants manager makes any needed edits to the report based on review feedback and gives most recent draft to the CSP project director.
 7. The CSP project director sends the draft to the Advisory Committee for review. The Advisory Committee sends feedback to the CSP project director.
 8. The CSP project director sends the feedback to the Office of Community Schools' grants manager.
 9. The Office of Community Schools' grants manager makes any needed edits and sends the report to the Advisory Committee for approval. The Advisory Committee signs off on the report. [Note: While the Advisory Committee reviews and provides feedback for all of the reports, it only signs off on the semi-annual reports.]
 10. The Office of Community Schools' grants manager makes any final edits needed after the tech edit and sends the final version to the CSP project director.
 11. CSP project director emails the final version of the quarterly report to the Department's grant project officer at the U.S. Dept. of Education. [Note: The quarterly report due April 1 is submitted as an attachment to the Annual Performance Report, all of which is uploaded to the U.S. Dept. of Education's G-5 system.]

KEY RESPONSIBLE STAFF

- CSP project director
- Office of Community Schools' grants manager

TIMELINE

Quarterly reports are due each year on Jan. 1, April 1, July 1 and Oct. 1. Semi-annual reports are due each year on January 1 and July 1. Annual performance reports are due each year on April 1. Reports should be drafted at least three to four weeks prior to the due date to ensure sufficient review and editing across the Department.

COMMUNICATION NEEDS

Most of the process of report writing and review will be internal. However, the semi-annual reports will be posted on the CSP Grant webpage of the Department's website.

DOCUMENTATION NOTE

The quarterly reports are stored on the CSP SharePoint site in the Quarterly Reports folder.

C. GRANT ADVISORY COMMITTEE

PURPOSE

The purpose of the Grant Advisory Committee is to provide oversight and additional accountability to the Department as it administers the implementation/expansion of the CSP grant and to ensure that the Department maintains transparency in this process.

PROCEDURE

1. The Department's point of contact with the Advisory Committee is the CSP project director. The CSP project director will contact the Advisory Committee and provide it with any documentation needed, as well as schedule meetings, ensure that committee-related activities are conducted in a timely and effective way, and receive feedback from the committee.
2. Create a charter for the Advisory Committee that sets forth its roles, responsibilities, and membership and addresses any potential issues regarding conflict of interest.
3. Develop the Advisory Committee. It must be composed of representatives from key stakeholder groups, such as nonprofit organizations with sponsoring experience, state community school organizations, colleges/universities with expertise in performance management, high-quality community school management organizations and organizations that represent the interests of families with children in community schools.
4. Determine the level of commitment expected of the committee. Committee members will serve on the committee for the duration of the grant.
5. Set a date for the first meeting of the Advisory Committee. The Advisory Committee must be formed at least 30 days prior to the date on which the Department publishes its first Request for Applications (RFA) under the CSP grant.
6. Determine the frequency by which the Advisory Committee will meet. After its first meeting, the committee will meet semi-annually in June and December of each year over the length of the grant. The committee may convene at other times, if needed, depending on any potential provisions of the CSP grant requiring its input.
7. Hold first meeting. At the first meeting of the Advisory Committee, the committee members will select the chairperson.

8. As part of sitting on the Advisory Committee, members are required to co-sign the semi-annual reports the Department is required to produce each year.
9. Should other CSP grant-related documents require input from the Advisory Committee, the CSP project director will provide committee members with those documents at least five business days prior to finalizing them.
10. Ensure that the Department adheres to any requirements of the Advisory Committee.

KEY RESPONSIBLE STAFF

- CSP project director
- Office of Community Schools' grants manager

TIMELINE

The first meeting of the Advisory Committee will be 30 days before the Department publishes its first RFA for the CSP grant. The committee will meet semi-annually after that, in June and December of each year.

COMMUNICATION NEEDS

Key staff will need to communicate with those persons chosen to serve on the Advisory Committee, making sure that they understand their roles and responsibilities as members as well as the commitment. Communication with Advisory Committee members will take place by both phone and email.

DOCUMENTATION NOTE

The Advisory Committee charter, as well as any other documents pertaining to the Advisory Committee, are stored on the CSP SharePoint site in the Advisory Committee folder.

D. WORKING WITH THE U.S. DEPARTMENT OF EDUCATION

PURPOSE

To ensure that the Department maintains a successful collaboration with both the U.S. Department of Education during the administration of the CSP grant.

PROCEDURE

1. Review the most recent continuation grant award notice to identify all of the high-risk and special conditions set forth by the U.S. Department of Education. These are high-priority items that must be addressed in the Department's process for administering the CSP grant.
2. Continue with weekly check-ins with the designated program officer from the U.S. Department of Education, updating that person on the progress and activities regarding the grant that take place. [Note: The frequency of the check-ins may decrease over time as the Department's administration of the grant is more solidified and aligned with federal requirements.]
3. Conduct bi-weekly meetings with Department staff assigned to work on various aspects of the grant to ensure that everyone is aware of what is going on.
4. Prepare for weekly check-ins with the U.S. Department of Education by having pre-check-in meetings.

KEY RESPONSIBLE STAFF

- CSP project director
- Office of Community Schools' grants manager

TIMELINE

Collaboration between the Department and the U.S. Department of Education is ongoing throughout the grant period. There are currently weekly check-ins with the program officer assigned to Ohio, but the frequency of these may decrease as the Department's CSP grant administration process becomes more transparent and concrete.

COMMUNICATION NEEDS

Most communication between the Department and the U.S. Department of Education is through emails and phone calls. These will remain the primary means of communication.

DOCUMENTATION NOTE

Emails between the Department and the U.S. Department of Education, as well as any other documented communications, will be maintained by the Office of Community Schools' director on the CSP SharePoint site in the Communications folder.

E. INDEPENDENT MONITOR

PURPOSE

The purpose of the independent monitor is to perform periodic “agreed-upon” procedures (AUPs) that address the major areas of program implementation/expansion risk, including the monitoring of the Department and all subgrantee award recipients.

PROCEDURE

1. Carry out the RFP process for selecting and hiring an independent monitor. The independent monitor must be hired at least 30 days prior to the Department’s posting of its first Request for Applications (RFA) for the CSP grant.
2. Develop the AUPs to be used as part of the independent monitoring process.
3. Schedule and conduct a meeting with the independent monitor to review the AUPs.
4. After receiving feedback from the independent monitor, revise the AUPs.
5. Distribute the AUPs to Legal Counsel, senior staff and independent monitor for review.
6. Continue the editing and review process for the AUPs until they have been approved and finalized.
7. Provide the independent monitor with the finalized AUPs and carry out discussions regarding the implementation of the AUPs.
8. The independent monitor will carry out the AUPs for both the Department and all subgrantees.
9. Check with the independent monitor regarding where data is being housed and how reports will be developed and distributed. The Department has direct, unfiltered access to the independent monitor and its records and will require any reports produced by the independent monitor to be made available to the public.
10. The independent monitor will provide the Department with copies of all reports.
11. If any of the reports provided by the independent monitor include findings, the Department will initiate an internal review of the issues and develop an action plan to make corrections or improvements needed.

KEY RESPONSIBLE STAFF

- CSP project director
- Office of Community Schools’ grants manager

TIMELINE

The independent monitor must be hired at least 30 days prior to the Department’s posting of its first RFA. Other timelines (e.g., frequency of monitoring) will be developed as needed.

COMMUNICATION NEEDS

Any reports produced by the independent monitor must be made public and, therefore, will be posted on the CSP grant webpage on the Department’s website.

DOCUMENTATION NOTE

Documents regarding the independent monitor and the AUPs are stored on the CSP SharePoint site in the Independent Monitor folder.

F. SEMI-ANNUAL SUBMISSION OF ITEMIZED BUDGET

PURPOSE

To ensure that the Department develops and implements a process for submitting an itemized budget to the U.S. Department of Education semi-annually, which is a requirement of high-risk special condition #1.

PROCEDURE

1. Thirty days prior to the beginning date of each six-month budget period (Oct. 1 and April 1), the Department must provide the U.S. Department of Education with an itemized budget.
 - a. Three weeks prior to the date on which the budget is due, develop a draft of the itemized budget.
 - b. Send budget draft to CSP project director, fiscal staff and any other staff deemed necessary for review.
 - c. Make any needed changes or additions based on draft feedback.
 - d. Send revised budget for needed staff review.
 - e. Finalize the budget.
 - f. Submit budget to U.S. Department of Education and wait for feedback.

KEY RESPONSIBLE STAFF

- Office of Community Schools' grants manager

TIMELINE

The Department must provide the U.S. Department of Education with an itemized budget at least 30 days prior to the beginning date of each six-month budget period of the grant (i.e., Oct. 1 and April 1).

COMMUNICATION NEEDS

Most communication is internal, the exception being the information to be submitted to the U.S. Department of Education.

DOCUMENTATION NOTE

Documents regarding the submission of the itemized budget are stored on the CSP SharePoint site in the Reporting folder.

G. USED SITE VISITS AND MONITORING CORRECTIVE ACTIONS (AS APPLICABLE)

PURPOSE

The purpose of this section is to ensure the department is responsive to all requests for documentation for site visits from USED and WestEd and addresses identified concerns and/or findings.

PROCEDURE

1. When the U.S. Department of Education schedules an on-site review at the Department, develop a process for ensuring that all required information is obtained and that all staff associated with the grant are aware of the current status of the Department's grant as well as the subgrantees.
2. After any check-in, on-site review or other means of contact with the U.S. Department of Education, conduct a meeting to discuss the U.S. Department of Education's findings or comments and revise any grant processes as needed.
3. If the department receives corrective actions from a USED on-site review, WestEd review, weekly check-in, etc., the department will develop a corrective action plan that includes the following information:
 - a. Identification of deficiencies;
 - b. Deliverables designed to address each deficiency;
 - c. Actions steps to meet the deliverables; and
 - d. A timeline for completing the actions steps for each deliverable.
4. If the department develops a corrective plan as noted in item 3 above, the department will monitor the implementation of the corrective action plan as follows:
 - a. The Director for the Office of Community Schools and the Grants Manager will establish benchmarks for completing actions steps for each deliverable;
 - b. The Office of Community Schools Director will meet with the Grants Manager weekly to determine progress towards each deliverable;
 - c. The Grants Manager will submit to the Director evidence of action during weekly meetings;
 - d. If the implementation of the corrective action plan is not on track to meet the specified deadlines, the OCS Director will consider allocating additional resources and/or reduce the responsibilities in other duties of the Grants Manager until the deliverables are completed or back on schedule.

KEY RESPONSIBLE STAFF

- CSP project director
- Office of Community Schools' grants manager

TIMELINE

A meeting will be held within one week of receipt of the findings and/or deficiencies. The timeline for individual deliverables will be determined as part of the corrective action plan development.

COMMUNICATION NEEDS

The Office of Communications will complete a technical edit of the reports produced by the Grants Manager and Director.

DOCUMENTATION NOTE

Documents regarding the corrective action plans are stored on the CSP SharePoint site in the Corrective Actions Plans folder.

A. CHARTER SCHOOL PROGRAM GRANT MONITORING RUBRICS

PURPOSE

To monitor all subgrantees through a desk review in the fall and a site visit in the spring.

OVERVIEW

Depending upon the type of grant received, one of two rubrics will be used during these reviews and visits: 1) planning evaluation rubric, or 2) implementation /expansion rubric.

The indicators in the monitoring rubrics are organized in five areas:

1. Program compliance
2. Fiscal compliance
3. Grant implementation/expansion
4. Performance on goals and objectives
5. Quality practices (implementation/expansion rubric only)

Every indicator on the rubric is tied to one or more grant assurances, federal guidance, performance measures, or agreed upon procedures (AUPs) for Ohio’s independent monitor.¹

Each indicator has four components, which include:

1. Criteria being evaluated;
2. Documentation that the subgrantee must upload in the compliance tool for evidence;
3. Narrative questions that the subgrantee must respond to and upload into the compliance tool (if applicable); and,
4. Interview questions that the Department staff will ask during the on-site visit.

PROCEDURE

Once Department staff review the evidence, a staff person must rate the subgrantee’s compliance and provide evidence for their rating. If the Department determines that the subgrantee is not in compliance on an indicator, staff must determine what additional actions are needed by the subgrantee to reach compliance, and specify a deadline by which the subgrantee must complete those actions. The Department must show evidence of follow-up with the subgrantee to ensure its compliance. The compliance system (see below) also provides space for the subgrantee to leave comments regarding the indicator to the Department.

RATINGS

Ratings are “compliant” or “non-compliant” for program, fiscal and grant implementation indicators. The ratings are “met”, “in progress”, or “not met” for performance objectives and quality practices. Subgrantees must immediately address any issues of non-compliance at the time they are discovered (e.g., ongoing fiscal monitoring, desk review or spring site visit). The Department has the discretion to conduct pop-in site visits and/or additional desk reviews if concerns arise throughout the year or numerous non-compliance issues are identified during the desk review. If the Department finds that the subgrantee is not implementing quality practices, the subgrantee will need to progress toward incorporating these quality practices to receive continued funding.

Because the Department will be using the data from the monitoring rubric to measure Ohio’s performance on the CSP grant, a numeric score will be attached to each rating.

For each subgrantee, the Department will aggregate the points and determine the percent of total possible points each subgrantee earned. (An annual score will be generated based upon the results of the spring site-visit.) These percentages will be used to hold the Department accountable.

¹ See the excel file labeled “indicators in the rubric.xlsx” for a complete crosswalk of the monitoring rubric and the various requirements.

GRANT COMPLIANCE SYSTEM

While the grant, the payment processing and ongoing fiscal monitoring rely upon the Department's online e-grant system, the Comprehensive Continuous Improvement Plan (CCIP), the desk reviews, the spring site visits and corrective action plans will be contained within the Department's grant compliance monitoring system. This electronic monitoring system allows agency teams to review criteria specific to their program but also allows status, testing and corrective action to be shared agency wide. In addition, allowing both the state teams and the subgrantees to upload financial and programmatic support documentation, the system allows offices to provide and track technical assistance. For CSP, subgrantees will log into the compliance system when entering required information for the desk review and spring site-visit and annual grant activities report. The monitoring protocols will be built into the Department's compliance system.

TRAINING OF DEPARTMENT STAFF AND SUBGRANTEES

The Department will train select Office of Community Schools (OCS) staff and fiscal staff on the indicators and the process for monitoring subgrantees. All subgrantees will receive training on the monitoring process and the expectations for their compliance. The subgrantee's grant manager, governing board members and other school staff members (if applicable, independent charter management staff) are expected to be at the school and/or available for interviews during the site visit.

DOCUMENTATION TO BE UPLOADED BY THE SUBGRANTEE

Documentation has already been provided to ODE through the RFA submission; therefore, the Department will pull the information into the compliance system from the CCIP. Subgrantees will not be required to upload these documents for CSP monitoring, unless something has changed in the documentation and a new copy is necessary for an accurate review. Documents not required as part of the RFA process, but may be necessary as evidence for compliance purposes is stated throughout compliance survey.

KEY RESPONSIBLE STAFF

The Office of Community Schools grants manager
The Office of Community Schools project director

TIMELINE

Responsible staff should notify all subgrantees at least 30 days prior to survey opening dates: Fall-review survey will open no later than December 31. Survey will remain open for 30 days. Desk reviews will begin after fall-review survey closing date and will be completed prior to spring site visits.

The mid-review survey will open in April and close 30 days after opening date. Mid-review survey desk reviews will be complete within 30 days of mid-review survey closing date.

Final -review survey will open in June and close 30 days later. Final-review survey desk reviews will be complete with 30 days after final-review survey closing date.

COMMUNICATION NEEDS

All subgrantees will be notified 30 days prior to survey opening dates and 14 days prior to site visits.

DOCUMENTATION NOTE

All documents will be uploaded into the compliance system. Documents include survey evidence, all site visit summary reports, requested deadline dates, and special circumstances,