

Nevada  
Striving Readers Comprehensive Literacy Program  
Subgrantee Monitoring Plan

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## Striving Readers Comprehensive Literacy (SRCL) Program Monitoring Plan

The Nevada Department of Education (NDE) will comply with all accountability, transparency, and reporting requirements that apply to the SRCL program. This includes the applicable provisions of the Education Department General Administrative Requirements (EDGAR), including requirements in 34 CFR Part 80 (Uniform administrative requirements for grants and cooperative agreements to state and local governments) which state:

*Grantees are responsible for managing the day-to-day operations of grant and subgrant supported activities. Grantees must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements and that performance goals are achieved. Grant monitoring must cover each program, function or activity.*

In order to comply with these requirements, the NDE has a comprehensive monitoring plan and protocol to review subgrant supported activities. The monitoring plans:

- Ensure that Subgrantees are complying with program requirements and achieving performance goals.
- Ensure Subgrantees are complying with fiscal requirements, such as having appropriate fiscal controls in place, using awards for authorized purposes, and adhering to the following funding distribution in which at least:
  1. 15 percent of the funds are used to serve children from birth through age 5;
  2. 40 percent of the funds are used to serve students in primary – elementary school;
  3. 40 percent of the funds are used to serve students with equitable distributions between middle and high school.

### **MODES OF DELIVERY**

The NDE SRCL team will conduct monitoring activities through both desktop and onsite monitoring. All Subgrantees will receive at least one onsite monitoring visit during the period of the grant. In instances where Subgrantees do not receive an onsite visit during the course of a particular program year, they will be monitored through desktop monitoring.

The onsite monitoring schedule will be prioritized by a risk-assessment criterion (described in the onsite monitoring section below). Monitoring strategies and schedules will be coordinated agency-wide to:

- identify cross-cutting areas of monitoring across programs;
- realize synergies;
- set clear expectations for Subgrantees;
- ease the burden on individual local education agencies, schools and partners.

## **I. DESKTOP MONITORING**

At a minimum, each Subgrantee will receive an annual desktop monitoring. There are two main components of the desktop monitoring process which involve the review of documents submitted by the Subgrantee: fiscal and programmatic.

### **1. Fiscal Review**

The NDE regularly monitors its Subgrantees for compliance with federal and local guidelines as described in EDGAR and related NDE-wide monitoring procedures. It is a tiered monitoring approach that could be as specific as a request for documentation supporting a single reimbursement request or as expansive as request for a series of quarterly reports or audits. The NDE team will work closely with the NDE Office of Management and Finance to ensure all Subgrantees are operating fiscally sound grant programs.

#### **a. Payment Process for Federal Funds (Reimbursement Policy)**

In accordance with section 80.21(d) (Financial administration: Payment) of the EDGAR, the NDE has implemented a cost reimbursement process for all Subgrantees. As such, this layer of desktop monitoring requires that all Subgrantees receive payments after they substantiate that the cost is allowable and is relevant to program expenditures as delineated within the Subgrantee's application and budget narrative approved by the NDE.

This process is the first layer of desktop monitoring and provides the opportunity for the SRCL team to flag discrepancies between the Subgrantee's approved application and budget and subsequent reimbursement requests.

#### **b. Review of Financial Documents**

During both onsite and desktop monitoring, the SRCL team will ensure that Subgrantees are maintaining accurate, complete, and reliable financial and programmatic documentation for all SRCL expenditures and are tracking these funds separately from expenditures from all other funding sources. Additionally, the SRCL team will require that Subgrantees provide documentation to support a sample of expenditures claimed on reimbursement requests. The SRCL team, will, at a minimum, require supporting documentation for one whole month's expenditures. In addition to the one month sample required of all Subgrantees, additional sampling requests (ranging in frequency and size) may be required based on the following risks:

- High percentage of disallowed costs
- Significant increases or decreases in planned drawdown timelines
- Inordinate amount of budget revisions in excess to reimbursement submissions
- Noncompliance relative to the funding distribution across age specific bands

- Audit findings (from independent and/or A-133 audits)
- Size of the award
- Request for reimbursement of goods or services not yet received

Additional requests beyond the minimal sampling stated above will be determined based upon the aforementioned risk factors. Subgrantees who frequently submit unsatisfactory samples may be subject to repeated sampling, and may be subject to the withholding, suspension or return of funds to the NDE when expenditure claims cannot be properly substantiated. Subgrantees will be required to prepare and submit their sample to the SRCL team two weeks prior to an onsite monitoring visit.

The Subgrantee must identify one main contact, preferably the Subgrantee SRCL contact identified in the subgrant application, and one backup person to serve as the contact point for the SRCL's notice to submit sampling. The main contact and backup person must collaborate with the Subgrantee financial officer in submitting sampling expenditures. Sample materials must be submitted via e-mail (or hard copy via certified mail, FedEx or UPS) to a designated SRCL team member (TBD). Requests for additional information may be required and must be provided within seven business days.

#### Types of Evidence

Items listed below represent documents that may be used to support expenditures submitted for reimbursement and that may be requested as part of the SRCL team's monitoring of the Subgrantee's proper administration of the federal SRCL grand program. The list provided below is by no means exhaustive.

- Payroll transactions
  1. A list of employees paid with federal grant funds
  2. Job positions or descriptions
  3. Time and effort records demonstrating employees who worked on grant activities
  4. Time and effort records demonstrating when employees worked
  5. Evidence of payroll reconciliation
  6. Accounting records indicating how salaries were charged
  7. Payment records indicating how salaries were paid
- Procurement transactions
  1. Requisitions
  2. Cost estimates
  3. Requests for bids, proposals, etc. (as required by the Subgrantee's procurement procedures)
  4. Copies of bids, proposals, etc. submitted

5. Evaluation documents (as required by the Subgrantee's procurement procedures}
6. Purchase orders or contracts
7. Invoices
8. Proof that items purchased were received
9. Inventory records
- Records showing the Subgrantee is meeting its obligations under EDGAR 76.730 (Records related to grant funds), including documents showing:
  1. Separate tracking of SRCL funds
  2. The amount of funds available under the grant
  3. How the Subgrantee used the funds
  4. The total cost of the project
  5. The share of that total cost provided from other sources
  6. Other records to facilitate an effective audit

### Sampling Methodology

The SRCL team may employ the use of sampling methodology when reviewing supporting documentation as part of the monitoring process. Sampling is used to observe random subsets in order to learn about a greater population from which the subset is taken. Inferences can be made from the observed subset, with a certain level of confidence that the inferences apply to the population as a whole. Sampling will allow the SRCL team to quantify results and relate them to the entire population being reviewed, using limited resources to review large amounts of materials.

### Financial Progress Reports

Subgrantees are also responsible for submitting either quarterly or semiannual financial reports to the SRCL team, depending on terms that will be outlined in the grant award notification (GAN). These reports will be submitted in addition to the monthly or bi-monthly reimbursement requests and will provide the SRCL team with regular updates on the use of funds and how these funds align to the deliverables described in the grand application. The SRCL team will use this information to determine if technical assistance or corrective actions are needed to ensure the projects' success.

In Nevada, local education agencies (LEAs), including charters, are eligible applicants for SRCL subgrants. However, LEAs must include preschool(s) or partner with a non-profit provider of early childhood education such as a Head Start Center. They must also partner with a non-profit community-based organization or agency that has a demonstrated record of effectiveness in improving the early literacy development of children, birth through kindergarten entry, and in providing professional development in early literacy.

Although Nevada's SRCL subgrant competition requires partnerships with early childhood providers to ensure a birth to grade 12 continuum, there may only be one lead, or fiscal agent. This said, the LEA receives the funding and is responsible for all reporting to the SRCL team. The lead is also responsible for ensuring that all federal and local regulations are met by all partners.

#### Desktop Monitoring Schedule

Desktop monitoring, inclusive of a fiscal review, will occur at least annually for all Subgrantees. Additionally, each time a reimbursement request is submitted, the SRCL team, as part of its cost reimbursement process, will substantiate that all costs are allowable and relevant to program expenditures as delineated within the Subgrantee's approved application and budget.

#### Desktop Monitoring Responses

After the monitoring, the SRCL review team will send written correspondence to the Subgrantee. The correspondence will provide an overview of all findings, recommendations and plans for onsite monitoring, if applicable. At this time, Subgrantees may also be required to develop and submit a corrective action plan (CAR) at the conclusion of the desktop review. In addition, the SRCL team will be available to provide targeted technical assistance as follow up to any desktop monitoring.

#### Resolution

Desktop monitoring should encourage Subgrantees to evaluate the degree to which their systems for grant management are consistent and aligned with statutory and regulatory requirements in order to identify possible improvements. Additionally, desktop monitoring will be used to inform onsite monitoring. The collection of fiscal, data, and programmatic indicators throughout the year will allow the SRCL team to determine which Subgrantees are in need of closer evaluation and for what aspects. Subgrantees will be informed in advance if they have been selected for onsite monitoring as a follow up to the desk review in the written correspondence.

## **2. Programmatic Review**

The SRCL team will also monitor Subgrantees to determine the quality of the SRCL implementation. All Subgrantees have agreed to develop or enhance programs to meet the programmatic goals of Nevada's SRCL award, and the SRCL team will make sure that these milestones are being met and are being implemented effectively. In addition to desktop financial monitoring, the SRCL team will also use desktop programmatic monitoring to help

subgrantees develop strong plans that they be able to implement throughout the life of the grant.

### Programmatic Progress Reports

Subgrantees will be responsible for submitting semiannual or annual progress reports to the SRCL team, depending on the terms outlined in the GAN. These reports will provide the team with updates on progress towards the deliverables described in the Subgrantees approved application. The team will use this information to monitor the Subgrantee to ensure implementation of project plans and stated deliverables. The team will also use this information to determine technical assistance to ensure the project's success.

## **II. ONSITE MONITORING**

Onsite monitoring involves a comprehensive assessment of the Subgrantee's programming. The review examines both the financial and programmatic elements and is conducted by members of the SRCL team at the Subgrantee site where the program is operating. The team will spend approximately one to two days on site to evaluate all phases of program administration and operations using a comprehensive evaluation rubric, or an innovation configuration (that will be developed in consultation with external evaluators). This tool will guide reviewers in evaluating the performance of the Subgrantee in its implementation quality. Any Subgrantee selected for onsite monitoring will be notified at least two weeks in advance.

### Onsite Review Process

During the onsite review, the SRCL team may perform some or all of the following tasks:

- Review selected documentation (e.g., expense reports, curriculum plans) relevant to the grant expenditure or program
- Review student data/records
- Visit classrooms
- Conduct focus group meetings with faculty, staff, students, parents, providers, or other key stakeholders participating in the program
- Perform interview with key staff
- Conduct additional activities, as needed

### Onsite Monitoring Schedule

The annual onsite monitoring calendar will be developed based upon the risk analysis described below. Each Subgrantee will receive at least one onsite monitoring visit during the period of the grant, but depending on the risk assessment, some Subgrantees may be monitored with greater

frequency. The SRCL team will distribute a list of which Subgrantees will be monitored in each year of the five-year grant.

### Risk Assessment

The SRCL team creates the monitoring schedule annually based upon several factors which may include previous monitoring reviews and other established risk factors. The SRCL team will consider at least the following risk criteria when determining the monitoring rotation and focus areas for each Subgrantee monitoring effort. Subgrantees will receive a risk rating (high, medium, or low risk) based upon these risk factors which will determine the level of monitoring that will be conducted.

- Consistent noncompliance relative to unresolved findings identified during previous monitoring reviews
- Individual complaints to the agency
- Total amount of the grant award
- Failure to spend funds in accordance with annual budget or general failure to liquidate funds
- Late reporting
- Percent of disallowed to allowed expenditures
- Excessive administrative costs
- Failure to adhere to the 15/40/40 distribution of funds across age specific bands
- Failure to adhere to terms and conditions set forth in the Grant Award Notification (GAN)
- Failure to make substantial progress toward grant goals and objectives

### Onsite Monitoring Response

After the conclusion of the onsite review, the SRCL team will send a monitoring report to the Subgrantee. The report will address any findings and recommendations, if applicable. Subgrantees will have 30 days to develop a corrective action plan, which delineates strategies and a timeline to correct any findings. The SRCL team will be available to provide targeted technical assistance.

### **CORRECTIVE ACTION PLAN**

Subgrantees may be required to submit a corrective plan (CAP) after desktop or onsite monitoring. The SRCL team will review a Subgrantee's CAP and provide feedback within 30 business days. The team will also work with the Subgrantee to ensure the plan is sufficient, manageable, and timely. Finally, the team may conduct post monitoring visits to ensure the plan has been sufficiently implemented.

## **CONDITIONS/RESTRICTIONS**

A Subgrantee's failure to comply with requests for monitoring or a plan to sufficiently correct any findings within a timely manner may lead the SRCL team to impose special conditions or restrictions. Special conditions and restrictions may include:

- Additional reporting
- Additional onsite monitoring
- Mandatory technical assistance
- Withholding or suspension of grant funds, with appropriate written notification.

The Subgrantee will be notified in writing if there are any special conditions or restrictions. The notice will include:

- Nature of the special conditions/restrictions
- Any actions which must be implemented before the conditions/restrictions may be lifted
- The process by which such conditions/restrictions may be appealed by the Subgrantee.

## **RESOLUTIONS**

The SRCL team will only consider all findings resolved after the Subgrantee has provided sufficient evidence that the corrective action plan has been fully implemented. At such point, a closeout letter will be issued to the Subgrantee to indicate that all findings have been resolved and to document which conditions/restrictions have been lifted.