



Illinois Impact Initiative CSP Subgrantee Monitoring Guide

Federal Program Title	Expanding Opportunities Through Quality Charter Schools Program (CSP) to State Entities
Federal Agency	U.S. Department of Education
State Entity / RFA Issuing Office	The Illinois Network of Charter Schools
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Overview

On September 28, 2022 the Illinois Network of Chart Schools (INCS) was awarded \$25,000,000 by the U.S. Department of Education under the FY 2022 Charter Schools Program (CSP) State Entities Grants Program. The CSP Grants to State Entities program is a competitive grant program that enables State entities to award subgrants to eligible applicants in their State to open and prepare for the operation of new charter schools and to replicate and expand high-quality charter schools.

INCS has developed a comprehensive monitoring plan that includes activities enabling us to identify programmatic and financial risk, carry out corrective action in a timely manner, and customize technical assistance to the specific needs of the subgrantee. This system will ensure that subgrantees make progress in their program performance and achieve operational and fiscal requirements of the grant. In addition to ensuring fiscal and programmatic accountability, our subgrant monitoring and data collection will enable INCS to provide targeted support and technical assistance to schools to further the grant objectives of increasing access to high-quality charter schools and improving the quality of the charter sector.

Upon final determination of subgrant awards, subgrantees will participate in a post-award call to review any changes that need to be made to their project objectives, performance measures, and/or budget. Subgrantees will be required to upload documentation that supports the Assurances found in the application. As a condition of receiving subgrant funds, subgrantees will be expected to participate in technical assistance activities, monitoring including in-person

site visits and the provision of spending reports and required annual reporting. INCS will utilize the subgrantee’s risk assessment to determine the depth and breadth of monitoring required. INCS will ensure that subgrantees implement grant activities as described (requiring pre-approval of any changes to the scope of the project), accomplish project objectives, and adhere to all federal rules and regulations. This monitoring system will ensure subgrantees remain on track and identify potential risk. All subgrantees are evaluated using INCS monitoring tools: quarterly reimbursement requests, quarterly performance reviews, and annual progress reports and using the U.S. Department of Education Charter Schools Program State Entity Monitoring Indicators. The checklist in Appendix 1 outlines required documents from the federal Department of Education (DOE). Each of these items will be verified either once or ongoing as changes take place within the school’s organization. At the conclusion of each grant year, subgrantees will submit an annual progress report to INCS demonstrating their progress toward goals, detailing budget expenditures, and describing how they will continue to meet their objectives.

Checklist for Subgrantee Monitoring

The following checklist outlines the types of requirements that CSP grantees (INCS) must monitor their subgrantees (schools). Some of these items require documentation during the application process, while others are on-going and will be verified yearly. When a subgrantee school updates its policies, adds new board members, or make changes that affect the items below, it is the school’s responsibility to inform INCS and provide updated documentation.

Table 1: Timeline for INCS Subgrantee Monitoring and Technical Assistance

Activity	Stage
Pre-Award Activities	
Applicants complete Eligibility check	Must be completed prior to initiating grant application
Request for Application (RFA) due, including supporting documents	Applicants found to be eligible after the Eligibility Check will be invited to apply for the CSP grant through the RFA
Proof of notification of application to authorizer	Authorizer must be notified of CSP application via email and proof must be sent to INCS team
Application Technical Assistance (TA) and Office Hours (Optional)	INCS will provide applicants with TA throughout the subgrant application period
Post-Award Activities (before MOU is Signed)	
Subgrantee Post-award Orientation Call	After award subgrantee and INCS will meet to discuss the CSP grant, subgrantee monitoring and TA requirements
Funds Release Meeting	After award subgrantee and INCS will meet to discuss budget template for allowability
Programmatic Reviews	Programmatic reporting to be submitted in Basecamp on a quarterly and yearly basis, including information on academic planning, enrollment, hiring, fund balances and additional operational metrics
Fiscal Reviews	The INCS team will review subgrantee budget reconciliations on a quarterly basis and subgrantees will have to submit quarterly reimbursement requests using Basecamp. Budget

	amendments will be made on a quarterly basis during the grant cycle.
Implementation Site Visits	On-site visits will take place semi-annually (more frequently depending on risk assessment)
TA and Training	Technical assistance trainings will be provided by INCS and will be attended quarterly by subgrantees
Corrective Action Plans	INCS to create and monitor adherence to corrective action plans; timeline dependent upon identification of areas of noncompliance or assessment of risk
Annual Performance Report (SAPR)	Annual reports used to assess and approve subgrantee performance are due within 90 days at the end of the fiscal year

Pre-Award Monitoring Activities

Monitoring activities will begin during the subgrant application process and will consist of an eligibility check, a review of academic, operational and financial documentation. INCS will also require all pre-award activities in Basecamp to be completed at the time of the post-award call. This tool will be updated annually by the subgrantee and reviewed by INCS.

- **Eligibility Check**

Prospective subgrantees will be required to submit an Eligibility Checklist using Survey Monkey Apply. The INCS team will review the eligibility checklist of each potential applicant before extending invitations to respond to the full RFA.

- **Request for Application submission will include Academic, Operational and Fiscal Documents and Review**

In conjunction with their subgrant proposals, applicants will be required to upload a range of documentation that will be used to ensure compliance with pertinent federal and state requirements and to establish a baseline for the INCS team to assess risk, provide technical assistance and monitor improvements. Documentation that will be requested in this stage is listed in Appendix 1.

- **Application Technical Assistance**

INCS will hold office hours throughout the Eligibility and RFA period to allow applicants access to INCS staff during stages of the grant application.

Post-Award Monitoring Activities

Once applicants have been awarded CSP funds, they will be required to participate in routine and ongoing monitoring activities, including but not limited to, desk reviews, site visits, performance reporting and technical assistance as required.

- **Sub-grant Post Award Orientation Call**
All subgrant award recipients are required to participate in a post award orientation call. During the call the INCS team will review monitoring expectations.
- **Funds Release Meeting**
All subgrantee award recipients are required to participate in a funds release meeting to discuss budget allowability and will work with INCS to get to an approved budget for CSP funds.
- **Programmatic Reviews**
Subgrantees will participate in programmatic and fiscal desk reviews throughout the year and grant periods. See appendix 3 for examples of areas covered during programmatic and fiscal reviews.
- **Implementation Site Visits**
Implementation site visits will occur as-needed, at least once, throughout the grant period. The purpose of the site visit is (1) to complement the desk review in allowing monitors to assess how grant-supported programs are being implemented and grant funds are being expended and (2) to identify areas of need in which technical assistance would be beneficial. The site visit will consist of review of physical items purchased with subgrantee funds and interviews with key stakeholders. INCS will document findings from each site visit.
- **Technical Assistance**
All subgrantee award recipients will be required to participate in formal Technical Assistance annually during the grant cycle. Individualized one-on-one Technical Assistance (Intensive Support Programming) occurs on a regular, as-needed basis.
- **Improvement Plan**
If an area in need of improvement is identified (academic performance, enrollment, or other programmatic indicators), INCS will follow up with the subgrantee to request a brief explanation and corresponding improvement plan. Improvement Plans are used to address isolated or early-stage concerns and do not indicate formal noncompliance.
- **Corrective Action Plans**
Monitoring findings will be shared with subgrantees and discussed during check-in calls with the INCS administrative team. Corrective Action Plans are required in cases of confirmed noncompliance, elevated fiscal or programmatic risk, or failure to address prior improvement plans. The depth and breadth of monitoring requirements will be predicated on the extent to which subgrantees are assessed as posing enhanced programmatic or fiscal risk. In addition to findings of noncompliance on any indicator, risk factors may include (this list is not exhaustive):
 - Projected enrollment not met
 - Technical assistance requirements not satisfied

- Funds not spent in an allowable manner
- Required reporting not completed
- Significant audit findings

Identification of such risk factors may result in increased reporting, more frequent monitoring, additional technical assistance, imposition of conditions, corrective action, grant amount reductions, and/or grant suspension or termination.

- **Annual Performance Report (SAPR)**
Subgrantees will be required to complete an Annual Performance Report (SAPR) at the end of each grant year to assess and approve subgrantee performance.

Risk Assessment & Corrective Action Plan Template

School	
Review Period	
Notice Date	
Project Contact Person	
Area of Concern	

Area of Concern / Summary of Recommended Follow-Up	Corrective Action Plan	Person(s) Responsible for Implementation	How Implementation Will Be Monitored and Evaluated	Timeline & Target Date for Completion	Status

Appendix 1: Documentation required as part of RFA submission

Verification Required	Document(s) satisfying this requirement
Proof of notification of application to authorizer	Copy of the notification letter and/or a PDF copy of the email sent to authorizer to notify applicants intent to apply to CSP grant
501c3 or other non-profit documentation	IRS letter confirming 501c(3) status
Charter Contract	Copy of charter contract
High Quality Evidence for Expansions and Replication	Evidence that the proposed replicating or expanding charter school has a rating of “exemplary” or “commendable” on the Illinois State Report Card for previous year or if the applicant school doesn’t meet the criteria above due to incomplete, non-existent or unreliable state data, interim assessment data that shows an upward trend in student performance and growth toward the definition of high quality
UEI Number	Copy of UEI (Unique Entity Identifier) number issues by the System for Award Management (SAM) to identify businesses and other entities that do business with the federal government
Required Assurances	Signed certification and assurances document
Required Descriptions	School executive summary, project narrative and needs analysis with supporting documents
Operational Budget	Five-year budget
CSP Goals and Budget	CSP budget summary and budget narrative
Organizational Documentation	Organizational chart, description of key staff responsible for administering and overseeing the subgrant including their responsibilities and duties and PDF copy of resumes of school leadership team
Evidence of strong, stable board leadership and governance	List of resumes of governing board members and affiliations, a copy of Board approved financial policies and standard operating procedures, and governing documents (bylaws)
Student Discipline	Copy of student discipline policy and plan
Conflict of Interest Questionnaire	Conflict of Interest form completed for your school district

Transportation plan for all students	Copy of Transportation plan for all students
Copy of lease or facilities contract (if applicable)	Copy of lease or facilities contract
CMO	A description of roles and responsibilities of charter management organizations or partner organizations, including the administrative and contractual roles and responsibilities of such partner

Appendix 2: Programmatic and Fiscal Monitoring (this list is not exhaustive; more reporting and documentation may be required in subsequent grant cycles)

Examples of documentation requested as part of the programmatic review:

- The schools meet federal and state definitions of a charter school
- Board-approved policies or procedures – conflict of interest, school closure and transfer of student records, enrollment and admissions policy (including lotteries and waitlist maintenance), document retention, personnel management, student discipline, etc.
- Key data points including enrollment, attendance, academic performance, student mobility, leadership and staff turnover, student discipline etc. (note: not all data points will necessarily be reviewed during each desk review)
- Site visit reports
- Transportation policies and procedures
- Academic or operational documents as requested.

Documentation requested as part of the fiscal review:

- Board-approved financial policies or procedures – procurement, travel reimbursement, cash management, allowability of costs, disposition of assets, etc. that are aligned with CFR 200
- Subgrantee approved budget and expenditures to date
- Verification that expenditures are allowable, allocable, and reasonable
- Invoices and other accounting documentation
- Inventory lists of items added with CSP grant funds
- Quarterly reimbursement packet to be uploaded onto Basecamp along with reimbursement supporting documentation (invoices and proof of payment)

Refunds and Adjustments: INCS will review CSP-funded refunds in accordance with the Subgrantee Refund Policy. Subgrantees will be required to review the policy, provide an explanation of the refund (including reason, amount, and itemized detail), and outline steps to prevent recurrence. INCS will determine next steps, which may include reimbursement offsets, repayment, or increased monitoring based on the nature and frequency of the issue.