

ACSIP

Monitoring Protocol



On-Site Monitoring of Arkansas Comprehensive School Improvement Plan

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The *No Child Left Behind Act of 2001* (NCLB) requires that the Arkansas Department of Education (ADE) establish a system to monitor the operation of Federal programs in every participating Local Education Agency (LEA), including charter schools. In Addition, NCLB requires that the ADE establish a risk-based system to perform on-site monitoring of districts that indicates high risk due to significant accountability and compliance issues. These LEAs may be monitored outside of the scheduled cycle if a district has serious or chronic compliance problems or has unresolved issues identified during either the desk-audit review or the previous monitoring process.

Arkansas *Act 807 of 2007* mandates that the monitoring process be expanded by ADE to include a periodic monitoring review of the LEA's and school's implementation of programs supported by State Categorical funds. Any district or charter school may be monitored at the discretion of ADE's Commissioner.

ADE developed this monitoring system during 2007-2008 school year. The Arkansas Comprehensive School Improvement Monitoring System includes on-site visits and desk audits. All NCLB and State programs are also monitored through the application and financial reporting approval processes. Each district receiving funds from any of the entitlement programs will be monitored at least once every six years with an on-site visit or desk-audit review. ADE's monitoring review system is based on a careful review of all Federal and State requirements.

This ACSIP Monitoring Guide is presented as a checklist that can be used by LEAs to ensure programs are operating in compliance with the law and guidance. Compliance indicator items were selected from among Federal entitlements and State categorical program requirements to ensure that the review covers all major aspects of the law and that the monitoring focuses – to the extent feasible – on matters most related to the educational purposes of NCLB. It is not designed to cover all requirements but is designed to include a review of samples of documented evidence of compliance. The LEA is responsible for operating all of its Federal and State funded programs in compliance with all applicable rules and regulations.

Review Team: A team of three or more ACSIP Unit staff members, including members that are not regularly assigned to the LEA, together with any necessary program area staff, will conduct a Comprehensive Program Review in the school district or charter school. The size of the team and the number of days in the visit will vary depending on the size of the LEA and the number of programs to be reviewed.

Review Process: The monitoring review process includes the following:

- A. **ACSIP Application and Financial Reporting Approval Processes** – All district and school applications are reviewed during this process. Electronic applications are reviewed to ensure that all components are apparent and appropriate within the plans. State categorical expenditures and Federal expenditures are also reviewed for compliance by the office of Federal Grants Management. Telephone calls may be made for issues that arise or for more detailed information regarding changes during the submission, amendment and/or adjustment period.
- B. **Desk-Audit Review** –LEAs may receive a desk audit for individual program review. When a desk audit is requested, evidence will be submitted to ADE for review. If ADE identifies any areas of non-compliance, the LEA will provide a written response to ADE outlining plans for immediate resolution of findings. Should it not be feasible to immediately resolve an issue, the LEA must submit a corrective action plan (See the on-site review process.)
- C. **On-site Review** – On-site review visits will include a review of documentation and interviews with appropriate program personnel or staff members. Depending on the programs being reviewed, this may also include nonpublic school staff, multi-district project members, parents and representatives of other agencies. All participants to be involved in the visit will be identified during preliminary planning by the LEA and the Monitoring Team Leader

Prior to the On-Site Review:

- The ACSIP Supervisor in collaboration with the superintendent or designee will establish a proposed schedule of activities. Districts will be contacted at least six weeks prior to the monitoring visit.
- A follow-up monitoring notification letter, including the process and checklist of items to be monitored, will be sent to the district confirming the dates and schedule.
- The ACSIP Supervisor will review and finalize on-site monitoring and logistics at least three weeks prior to the visit.
- The superintendent or designee will ensure that documentation is readily available and organized. Some documents **may** be requested prior to the visit. Appropriate documentation should samples of all items listed in the evidence column.

During the On-site Review:

- **Entrance Conference:** An entrance conference is held with the superintendent and other district personnel that the superintendent may deem appropriate. The meeting acquaints staff with the team and provides an opportunity to familiarize district staff with the purpose and goals of the visit.
- **Exit Conference:** At the end of the on-site visit, the monitoring team will hold an informal exit conference with the superintendent or charter school leader and anyone else he or she chooses. The team will summarize the monitoring activities, the potential findings, recommendations and the timeline for developing the monitoring report. The team leader should emphasize that the information presented at the exit conference is preliminary and explain that during the development of the monitoring report, the team will continue to review data collected during the on-site visit.

Report: ADE monitoring team will provide a final monitoring report as outlined below. Each member of the monitoring team will draft individual sections and the monitoring team leader will oversee the development of the report.

- A. Monitoring Report:** Within twenty (20) business days of the exit conference, a written draft of the monitoring report consisting of preliminary findings will be issued to the superintendent. The superintendent or designee should review the report for factual accuracy. The LEA will have thirty (30) days to submit any compliance documentation or evidence that was not available during the review process. The final report will be issued within sixty (60) business days of the exit conference.

In the event all items of noncompliance are not resolved, a formal written response by the school district with regards to any required corrective action will be due to ADE thirty (30) days after the final report is mailed. The response must outline the planned implementation of any corrective actions, including timelines for correcting identified areas of noncompliance.

- B. Content:** The on-site team gives a rating for each compliance criterion it reviews; those ratings are:

1. “Implemented” (Compliance)—program requirements are at least substantially implemented and/or program requirements have been fulfilled;
2. “Implementation in Progress”—the district is training staff or beginning to implement new requirements (results of Scholastic Audit Recommendations or new programs) in such a way that the on-site team anticipates that the new requirements will be implemented by the end of the school year or within the required time frame;
3. “Partially implemented” (Finding)—program requirements have been implemented in part but not in total;
4. “Not implemented” (Finding)—program requirements are at least substantially not implemented and/or no action has occurred toward the implementation of program requirements; and

5. “Not applicable”—does not apply.

C. Findings - The on-site team includes a finding for each criterion that it rates “Partially Implemented,” or “Not Implemented” explaining the basis for the rating.

Response: **District Response:** Where criteria are found “Partially implemented” or “Not implemented,” the district or charter school must propose corrective action to bring those areas into compliance with the relevant statutes and regulations. The LEA will complete and submit the Corrective Action Plan, signed by the Superintendent of Schools (or designee) and the local programs’ director responsible for the program with the compliance issue.

This document must delineate the compliance issue(s), the steps that will be taken to address the issue(s), the date those steps will be accomplished and the documentation that will be available to demonstrate compliance. This document will be sent to the assigned ACSIP Monitoring Review Team Leader for his/her approval and signature/date.

This corrective action plan will be due to ADE within thirty (30) business days after the issuance of the Final Report and is subject to the ADE’s review and approval.

- LEA responses are carefully reviewed to ensure that all compliance issues identified in the monitoring report have been addressed. When the monitoring team determines that the LEA has taken steps to ensure full LEA compliance in the identified areas and provided documentation that the actions have been implemented, ADE will send an official notification acknowledging resolution of noncompliance.
- An LEA that does not respond to the report within the established timeline or fails to comply with the corrective action plan will have a condition placed on the program’s grant award by ADE, which may include withholding of funds.

Follow-up: If necessary, the monitoring team leader in collaboration with the ACSIP Supervisor will schedule a follow-up review to verify the implementation of required corrective actions and to provide technical assistance as necessary.

School districts and charter schools must demonstrate effective resolution of noncompliance identified by the ADE as soon as possible but in no case later than one year from the issuance of the ADE’s Final Program Review Report