

NOTE: The Uniform Administrative Requirements at 2 CFR Part 200 apply to all grants and non-competing continuations (including carryover funds) made on or after December 26, 2014. The audit requirements at 2 CFR Part 200 Subpart F apply to fiscal years beginning on or after December 26, 2014.

FISCAL MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence	Determination	Remarks
<p>NOTE: Subgrantees may note that multiple indicators require the same evidence. The subgrantee does not need to provide multiple submissions of the same document, instead note the applicable indicator and document description in the naming convention (i.e. Fiscal 1.1,1.2,1.3 _General Ledger).</p>			<p>Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.</p>	<p>On-Site Documents: These documents must be made available to OSSE during the monitoring visit.</p>	
<p>Indicator 1: Financial Management</p>					
1.1	<p>The subgrantee can provide evidence that its financial management system provides for the identification in its accounts of all Federal awards received and expended and the Federal programs under which they were received. Federal program and Federal award identification must include, as applicable, the CFDA title and number, Federal award identification number and year, name of the Federal agency, and name of the pass-through entity, if any.</p>	2 CFR §200.302(b)(1)	<p>- Screenshots of financial management system, including screenshots showing the identification of awards within the financial management system</p> <p>- Financial management system documentation including the following: 1. Sample accounting journal entry from FY18 that includes transactions using federal grant program funds subject to monitoring; 2. General ledger; and 3. Chart of accounts.</p>	Met Requirements	
1.2	<p>The subgrantee can provide evidence that its financial management system provides for the accurate, current, and complete disclosure of the financial results of each Federal award or program.</p>	2 CFR §200.302(b)(2)	<p>- Fiscal management system documentation requested in Indicator 1.1</p>	Met Requirements	
1.3	<p>The subgrantee can provide evidence that its financial management system provides for the records that identify adequately the source and application of funds for federally-funded activities, including information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest, and are supported by source documentation.</p>	2 CFR §200.302(b)(3)	<p>- Fiscal management system documentation requested in Indicator 1.1 - Subgrantee source documentation to support OSSE's expenditure sample request such as invoices and receipts of payment</p>	Met Requirements	
1.4	<p>The subgrantee can provide evidence that its financial management system provides for the comparison of expenditures with budget amounts for each Federal award.</p>	2 CFR §§200.302(b)(5) and 200.308	<p>- Fiscal management documentation requested in Indicator 1.1 - Evidence of internal controls such as reconciliation between the approved OSSE budget and subgrantee expenditures (e.g., budget reconciliation)</p>	Met Requirements	

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1.5	The subgrantee can provide documentation of the policy(ies) and procedures for accounting practices, budgeting process (tracking and reporting of expenditures), written procedures for determining the allowability of costs, cash management practices, and procedures for managing information and documentation, including its requirements for protecting personally identifiable information and electronic records.	2 CFR §§200.302(b) and 200.303(e)	- Subgrantee source documentation to support OSSE's expenditure sample requests such as invoices, receipts of payment, and contracts - Subgrantee financial policies and procedures related to the following: - Accounting and budgeting practices - Allowability procedures - Cash management procedures - Record retention policies - Methods for collection, transmission, and storage of personally identifiable information		Met Requirements	
1.6	The subgrantee can provide evidence of financial operations and procedures which demonstrate evidence of internal controls.	2 CFR §§200.302 and 200.303	- Subgrantee source documentation to support OSSE's expenditure sample requests such as purchase orders, invoices, receipts, and contracts - Subgrantee financial policies and procedures requested in Indicator 1.5		Met Requirements	
1.7	The subgrantee can demonstrate that funds for the current grant period were obligated within the period of availability.	34 CFR §§76.707-76.710, 2 CFR §§200.77 and 200.309	- Subgrantee source documentation to support OSSE's expenditure sample requests such as invoices, receipts of payment, and contracts		Met Requirements	

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Indicator 2: Compensation for Personnel Services						
2.1	The subgrantee maintains compliant time and effort records that meet the following requirements: (1) are supported by a system of internal controls which provides reasonable assurance that charges are accurate, allowable, and properly allocated; (2) are incorporated into official records; (3) reasonably reflect total activity for which employee is compensated by subgrantee; (4) encompass both federally assisted and other activities compensated by the non-federal entity on an integrated basis; (5) comply with established accounting policies and practices or meet the requirements of a substitute system and if applicable, support the distribution of the employee's salary or wages among specific activities or cost objectives.	2 CFR §§200.430(i) and 200.430(vii)	<ul style="list-style-type: none"> -Time and effort policy -Two periods of time and effort documentation for personnel funded by grant(s) being monitored - Timesheets for personnel funded by grant(s) being monitored - Position description for personnel funded by grant(s) being monitored - Semi-annual certifications signed by employee/immediate supervisor for personnel funded by grant(s) being monitored - PARs/Monthly Activity Reports for personnel funded by grant(s) being monitored - Corrective journal entries, if applicable - List of personnel by funding source for personnel funded by grant(s) being monitored 		Finding of Noncompliance	<p>Finding: The LEA failed to provide Time and Effort documentation totaling \$6,429,495.20 (Schoolwide - \$5,719,138.61 for 26 staff persons, Title III - \$73,922.36 for four staff persons, and 21st Century - \$636,434.23) for the grants identified on OSSE's expenditure sample from the 2017 - 18 school year.</p> <p>Citation: As required by 2 CFR §§200.430(i), the subgrantee maintains compliant time and effort records that meet the following requirements: (1) are supported by a system of internal controls which provides reasonable assurance that charges are accurate, allowable, and properly allocated; (2) are incorporated into official records; (3) reasonably reflect total activity for which employee is compensated by subgrantee; (4) encompass both federally assisted and other activities compensated by the non-federal entity on an integrated basis; (5) comply with established accounting policies and (6), if applicable, support the distribution of the employee's salary or wages among specific activities or cost objectives.</p> <p>Action Required: Within 30 days, the LEA must submit to OSSE the following:</p> <ul style="list-style-type: none"> - Recreated semi-annual certifications or personnel activity reports for employees whose wages and salaries were reimbursed from the Schoolwide, Title III and 21st CCLC grants and were identified on OSSE's expenditure sample from the 2017-2018 school year, provided that the LEA can confirm that the recreated semi-annual certifications or personnel activity reports accurately reflect the total work performed; and - Additional evidence to support the recreated time and effort documentation and demonstrate that the reimbursements paid by OSSE to the LEA were accurate, allowable, and properly allocated (i.e. position descriptions, organizational charts, schedules, and any other documents contemporaneously prepared with the employee's actual grant activities which support the distribution of the employee's salary or wages to specific activities or cost objectives).

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2.1 CONTD						<p>Action Required CONT'D:</p> <p>Within 30 days, the LEA must also submit a corrective action plan stating how the LEA will ensure that Time and Effort documentation is collected regularly for employees who are paid from federal funds and that the LEA follows its own Time and Effort policy and procedures. Such plan must include the following:</p> <ul style="list-style-type: none"> - A list of trainings for employees, with anticipated dates, on Time and Effort reporting requirements within the LEA (trainings must be completed by August 30, 2019); and - the staff persons that will be required to participate in the above training; - the tool or mechanism that the LEA will use to ensure that staff implement its Time and Effort policies; and - a timeline detailing the sequence of check-ins the LEA will conduct, following the training, to ensure that its Time and Effort policies are being followed. <p>No later than September 30, 2019, the LEA must submit to OSSE copies of the following:</p> <ul style="list-style-type: none"> - the training materials used to train staff; and - agendas and sign-in sheets from each training offered. <p>OSSE reserves the right to take further action based on the documents provided by the LEA.</p> <p><input type="checkbox"/></p>
2.2	<p>The subgrantee can provide documentation which demonstrates that internal controls exist for payroll in regard to the following areas:</p> <ul style="list-style-type: none"> - Internal controls are in place that forbid and prevent the issuance of payroll checks prior to time and attendance being approved; - Internal controls are in place and utilized in order to prevent the continual payment to any employee who has been terminated and no longer works for the subgrantee; and - Internal controls are in place which demonstrate segregation of duties in regards to payroll. For example, payroll checks are distributed by someone other than persons who prepare payrolls, supervise employees, approve time reports, or sign paychecks. 	2 CFR §§200.302(b)(4), 200.303, and 200.430(i)	<ul style="list-style-type: none"> - Payroll policy - Financial policies and procedures - Organizational chart - List of federally funded employees terminated or separated within the last 12 months - Payroll distribution report for FY18 from which OSSE will request supporting documentation for select staff during on-site visit 		<p>Met Requirements</p>	

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Indicator 3: Equipment and Technology/Property Management						
3.1	The subgrantee can provide written equipment management and control policies that demonstrate how it safeguards all assets purchased with federal funds, including both equipment and high value and/or mobile items with a purchase price less than \$5,000. The policies must detail what actions the subgrantee takes when property is lost, damaged, or stolen.	2 CFR §200.302(b)(4); 2 CFR §200.313(d)(3)	- Property management policy - Police report(s) for stolen equipment, if applicable		Met Requirements	
Indicator 3: Equipment and Technology/Property Management (This section only applies to subgrantees that used the federal grants under review to purchase equipment during the program year).						
3.2	The subgrantee maintains the following records for equipment and computing devices purchased with federal funds: a. Description of the item. b. Serial number or other identification number. c. Funding Source (including the FAIN). d. Entity that holds the title. e. Acquisition date. f. Cost, including percentage of Federal participation in the cost. g. Location. h. Use and condition. i. Disposition data, including the date of disposal and sales price or the method used to determine current fair market value.	2 CFR §§200.313, 200.310-316, and 200.302(b)(4)	- Property management policy - Subgrantee inventory list of equipment purchased with federal funds	- OSSE will conduct a physical inventory of select items identified from the subgrantee inventory list to review equipment and tracking numbers.	N/A	

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3.3	The subgrantee can provide evidence that its equipment policy includes maintenance procedures to keep property in good condition.	2 CFR §200.313(d)(4)	- Property management policy		N/A	
3.4	The subgrantee conducts a physical inventory check on computing devices and equipment purchased with federal funds at least every two years that includes the following: a. Confirms the computing devices and equipment were found at the location as identified in the equipment database; b. Assesses the condition of the computing devices and equipment; c. Confirms that computing devices and equipment were located in a secure environment (equipment is located in a room, storage cabinet, etc. that can be locked up when not in use); d. Investigates any lost, damaged or stolen computing devices and equipment; and e. Requires the subgrantee to follow-up to determine the cause and to implement corrective action if the results of the physical inventory indicate there is a systemic weakness related to keeping the log or database current, security over equipment and computing devices, or other areas of non-compliance.	2 CFR §§200.302(b)(4), 200.313(d)(2), and 200.313(d)(3)	- Property management policy - Evidence of when the subgrantee conducted the inventory check (e.g., date notations on inventory log)		N/A	

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3.5	The subgrantee has a process to formally dispose of equipment and pay back proportionate amounts as required (if fair market value exceeds \$5,000 or more).	2 CFR §200.313(e)	- Property management policy		N/A	
3.6	The subgrantee has a process to formally dispose of supplies and pay back proportionate amounts as required (if total aggregate value exceeds \$5,000).	2 CFR §§200.20, 200.94 and 200.314	- Property management policy		N/A	
Indicator 4: Procurement Standards						
4.1	The subgrantee has, in effect, written purchasing practices and policies.	2 CFR §200.318(a)	- Procurement policy		Met Requirements	
Indicator 4: Procurement Standards (This section only applies to subgrantees that used the federal grants under review to procure goods or services during the program year).						
4.2	The subgrantee can provide evidence that its purchasing practices and policies ensure that all procurement transactions are conducted in a manner providing full and open competition and that the appropriate method of procurement is being used: micro-purchases; small purchase procedures; sealed bids; or competitive proposals. Some situations which could restrict competition are (1) placing unreasonable requirements on firms in order for them to qualify to do business; (2) requiring unnecessary experience and excessive bonding; (3) noncompetitive pricing practices between firms or between affiliated companies; (4) noncompetitive contracts to consultants that are on retainer contracts; (5) organizational conflicts of interest; (6) specifying only a 'brand name' product instead of allowing 'an equal' product to be offered and describing the performance or other relevant requirements of the procurement; and (7) any arbitrary action in the procurement process.	2 CFR §200.319(a)	- Procurement policy - List of solicitations used to procure goods and services with federal funds	- Solicitations selected by OSSE following review of the subgrantee list of solicitations. Of the solicitations selected by OSSE, the subgrantee must provide the following: 1. Copy of the solicitation; and 2. Evidence of the procurement method (competitive or sole source) (a) If the competitive procurement method was used to procure goods or services, the subgrantee must provide the following: - Copies of bids received; and - Vendor applications, proposals or estimates. (b) If the sole source procurement method was used to purchase goods or services, the subgrantee must submit the following: - the rationale for using the non-competitive process; - independent quotes or research; and - contract or other agreement detailing the services or goods agreed to be provided by the vendor.	Met requirement	

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4.3	The subgrantee can provide evidence that its purchasing practices and policies ensure that all solicitations (1) incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured; and (2) identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.	2 CFR §200.319(c) -(d)	- Procurement policy	- Documents requested for Indicator 4.2	Met Requirements	
4.4	The subgrantee can provide evidence that internal controls are in place to ensure that contract requirements are being fulfilled by vendors consistent with the terms, conditions and specifications of their contract or purchase orders.	2 CFR §200.318(b)	- Fully executed contract(s) for OSSE identified procurements in the expenditure sample - Procurement policy - Contract amendments, if applicable - Subgrantee source documentation to support OSSE's expenditure sample requests such as change orders, evaluation(s) of services rendered or work performed, vendor call logs, etc.		Met Requirements	
4.5	The subgrantee can provide evidence demonstrating that expenditure transaction files are maintained in such a manner that documents supporting any transaction can be easily located.	34 CFR 76.730	- Subgrantee source documentation to support OSSE's expenditure sample requests such as contracts, invoices, checks, e-checks, and bank statements demonstrating payment		Met Requirements	
4.6	The subgrantee can provide evidence that a price or cost analysis has been performed on procurements over the small purchase threshold (\$100,000 for DCPS, \$25,000 for charter schools) in compliance with published protocols and made independent estimates before receiving bids or proposals.	2 CFR §§200.88 and 200.323	- Contract cost or price analysis for solicitations identified in OSSE's expenditure sample - Copy of advertisement published in two major city newspapers		Met Requirements	

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4.7	The subgrantee can provide evidence that it submitted the required documentation to PSCB relating to contracts exceeding \$25,000. (Charters only)	2 CFR §200.318(a)	- Notification to PCSB of contracts totaling \$25,000 or more to a single vendor for FY18 including all correspondence, emails, memorandums to PCSB (i.e., EpiCenter email or screenshot of notification email to PCSB) - List of contracts over \$25,000 or contracts totaling \$25,000 or more from a single vendor within a fiscal year		N/A	
4.8	The subgrantee can provide evidence verifying that maintained procurement documentation is sufficient to detail the history of each transaction, including rationale for the method of procurement, selection of contract type, contractor selection or rejection and the basis for the contract price in regards to price extensions, additions, freight charges, discounts, etc.	2 CFR §§200.318(b) and 200.318(i)	- Procurement policy - Subgrantee source documentation to support OSSE's expenditure sample requests such as the following: - Requests for proposals - Bids or quotes from multiple vendors - Price lists - Proposed statements of work, estimates, catalogs and other generally available product literature published by comparable vendors - Evidence of review and evaluation of bids		Met Requirements	
4.9	The subgrantee can provide evidence of written standards of conduct for any employee involved in the award or administration of contracts, including conflicts of interests; accepting gifts, favors, etc.	2 CFR §200.318(c)(1)	- Conflict of Interest Policy	- Sample of five Employee Disclosures or Conflict of Interest Policies signed by subgrantee staff identified by OSSE	Met Requirements	
4.10	If the subgrantee has a parent organization, the subgrantee maintains written standards of conduct covering organizational conflicts of interest (Charters only).	2 CFR §200.318(c)(2)	- Procurement policy - Conflict of Interest Policy		N/A	

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4.11	Subgrantee only uses noncompetitive proposals under the following circumstances: (1) the item is available only from a single source; (2) the public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation; (3) the Federal awarding agency or pass through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or (4) after solicitation of a number of sources, competition is determined inadequate.	2 CFR §200.320(f)	- Procurement policy - If the sole source procurement method was used to purchase goods or services from the OSSE identified expenditure sample, the subgrantee must submit the following: - the rationale for using the non-competitive process - independent quotes or research - contract or other agreement detailing the services or goods agreed to be provided by the vendor - Link to DC Register notification of solicitation		Met Requirements	
4.12	The subgrantee can provide evidence and verification showing contractors are not on the Excluded Party List (EPL) and are in good standing.	2 CFR §§200.212, 200.213 and 2 CFR 200 Part 180	- Screenshots showing the date that the subgrantee checked sam.gov to verify that the vendor was not on the Excluded Party List (EPL)		Met Requirements	
Indicator 5: Audits/Reports						
5.1	The subgrantee can provide a copy of the single audit/annual financial statement audit for the monitoring period being reviewed. (Example: most recent single audit report) (Applicable to subgrantees that expend at least \$750,000 of Federal funds).	2 CFR §200.501	- On file at OSSE		Met Requirements	
5.2	The subgrantee has a document retention policy which ensures that records, including expenditure data, are maintained in such a manner that documents supporting any transaction can be easily located and are maintained for at least 5 years.	2 CFR §§200.302(b)(3), 200.333 and 200.335	- Record retention policy		Met Requirements	

NOTE: In 2012-13, OSSE began using the District of Columbia Corrective Action Tracking System (DC CATS), a web-based application, to track IDEA compliance and the correction of noncompliance on behalf of subgrantees. The results of the IDEA portion of your subgrantees most recent on-site monitoring visit are released via DC CATS. The following IDEA section of this consolidated on-site monitoring report is only for informational purposes and is intended to provide the subgrantee with a quick summary of the results of the most recent on-site monitoring visit. All activities regarding the correction of identified noncompliance must be completed in DC CATS.

DC CATS can be accessed using this link: <https://dccats.spedsis.com/>

The results included in the LEA Program Management and Administration section are based on the results of the student file review portion of the on-site monitoring visit. If less than 80 percent of the files reviewed for each area are deemed compliant, the subgrantee must complete an additional agency-level corrective action. Please note that the agency-level corrective actions are in addition to any individual student-level corrective actions that are required in the student-level section of the IDEA report below. To resolve student level corrective actions, there are two stages, or prongs. Both Prong 1 and Prong 2 correction must occur as soon as possible, but no later than one year from the date of notification of noncompliance. To complete the Prong 1 correction, when a subgrantee receives written notification of a finding of noncompliance through DC CATS, the LEA must first correct the individual student level noncompliance. Next, the subgrantee must demonstrate that it is now correctly implementing the specific regulatory requirement, which OSSE determines through the Prong 2 review. To complete Prong 2, OSSE reviews additional data through another file review in SEDS. OSSE has identified a few additional pieces of evidence needed for our review as indicated below. Otherwise all items must be submitted through DC CATS.

IDEA: LEA PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
Least Restrictive Environment (LRE) (LEA-level)							
1 (DC CATS 1)	The subgrantee has a continuum of alternative placements available, including instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions.	34 CFR §300.115	- Special Education Handbook - Special Education Staff Roster			Met Requirements	
Individual Education Program (IEP) (LEA-level)							
2 (DC CATS 2)	The subgrantee ensures that student IEPs are accessible to all who are responsible for their implementation (e.g., regular education teachers, special education teachers, and related service providers).	34 CFR §300.323(d)(1)	- Special Education Handbook			Met Requirements	
Data (LEA-level)							
3 (DC CATS 3)	The subgrantee has made all documents related to the individual student file reviews accessible in SEDS.	34 CFR §300.211	- See DC CATS			Met Requirements	
4 (DC CATS 4)	The subgrantee responds to requests for data in a timely manner.	34 CFR §300.211	- See DC CATS			Met Requirements	
Dispute Resolution (LEA-level)							
5 (DC CATS 5)	The subgrantee provides information to OSSE regarding State complaints within 10 days of request.	OSSE State Complaint Policy	- See DC CATS			Met Requirements	
6 (DC CATS 6)	The subgrantee timely implements corrective actions contained in the State complaint decision letter.	34 CFR §§300.600(a) and 300.200	- See DC CATS			Finding of Noncompliance	LEA must develop and implement a plan that addresses timely compliance and dispute resolution activities.

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			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
National Instructional Materials Accessibility Standards (NIMAS) (LEA-level)							
7 (DC CATS 7)	The subgrantee provides instructional materials to blind students or other students with print disabilities.	34 CFR §300.172	- See DC CATS			N/A	
Equitable Services (LEA-level)							
8 (DC CATS 11)	The subgrantee has undergone timely, meaningful consultation with private school representatives and the representatives of parents of parentally placed private school students with disabilities. (DCPS Only)	34 CFR §300.134	The subgrantee must submit materials from quarterly meetings: - Presentations; - Meetings notes; - Sign in sheets; and - Notice of disagreement by stakeholders (if applicable).			Met Requirements	
STUDENT FILE REVIEW							
Initial Evaluation and Reevaluation (Student-level)							
9 (DC CATS 12)	Upon initial referral, or parent request for evaluation, parents were provided procedural safeguards.	34 CFR §300.504(a)(1)	- See DC CATS		1	Finding of Noncompliance	Provide a copy of procedural safeguards to parents.
10 (DC CATS 13)	The signature for parent consent was obtained prior to the initial evaluation.	34 CFR §300.300(a)	- See DC CATS		0	Met Requirements	
11 (DC CATS 14)	A variety of assessment tools and strategies were used to gather relevant functional, developmental, and academic information about the child, including information provided by the parent.	34 CFR §300.304(b)(1)	- See DC CATS		0	Met Requirements	
12 (DC CATS 15)	The signature for parent consent was obtained prior to the date of reevaluation.	34 CFR §300.300(c)(1)	- See DC CATS		1	Finding of Noncompliance	Not correctable at the student level.
13 (DC CATS 16)	A variety of sources were used to determine eligibility.	34 CFR §300.306(c)	- See DC CATS		0	Met Requirements	
Individualized Education Program (IEP) (Student-level)							
14 (DC CATS 17)	Parent/student was invited to the most recent IEP meeting.	34 CFR §300.322(a)(1)	- See DC CATS		1	Finding of Noncompliance	Provide evidence that the parent/student attended the meeting or refused to attend the meeting. If parent/student was not invited, reconvene IEP meeting with invitation to parent/student.
15 (DC CATS 18)	Parent/student was notified of IEP meeting early enough to ensure they will have an opportunity to attend.	34 CFR §300.322(a)(1)	- See DC CATS		2	Finding of Noncompliance	Not correctable at the student level.

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Individualized Education Program (IEP) (Student-level)							
16 (DC CATS 19)	As evidence of parent participation, the individual who signed the IEP meets the definition of "parent" in 34 CFR §300.30.	34 CFR §300.30	- See DC CATS		0	Met Requirements	
17 (DC CATS 20)	General education teacher, unless excused, attended the IEP meeting.	34 CFR §§300.321(a) and 300.321(e)	- See DC CATS		3	Finding of Noncompliance	Not correctable at the student level.
18 (DC CATS 21)	Special education teacher, unless excused, attended the IEP meeting.	34 CFR §§300.321(a) and 300.321(e)	- See DC CATS		1	Finding of Noncompliance	Not correctable at the student level.
19 (DC CATS 22)	The subgrantee designee, unless excused, attended the IEP meeting.	34 CFR §§300.321(a) and 300.321(e)	- See DC CATS		2	Finding of Noncompliance	Not correctable at the student level.
20 (DC CATS 23)	An individual who can interpret evaluation results, who may be a member of the team described in indicators 17-19, attended the IEP meeting, unless excused.	34 CFR §§300.321(a) and 300.321(e)	- See DC CATS		7	Finding of Noncompliance	Not correctable at the student level.
21 (DC CATS 24)	The IEP includes a Present Level of Academic Achievement and Functional Performance (PLAAFP) that states how disability affects involvement in general curriculum (ages 6-21) or how the disability affects student's involvement in appropriate activities (ages 3-5).	34 CFR §300.320(a)(1)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS	- Work samples - SEDS progress reports - Benchmark Assessments (e.g., Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments) - PARCC scores - Alt-MSA scores	1	Finding of Noncompliance	Convene an IEP meeting or amend the student's IEP so that it includes a PLAAFP that demonstrates how disabilities affects involvement and progress in general curriculum.
22 (DC CATS 25)	The IEP contains a statement of measurable annual goals (aside from related services goals) designed to meet the student's needs that result from his/her disability.	34 CFR §300.320(a)(2)(i)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS	- Work samples - SEDS progress reports - Benchmark Assessments (e.g., Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments) - PARCC scores - Alt-MSA scores	0	Met Requirements	
23 (DC CATS 27)	In the event that the student's behavior impedes the learning of the student or other students, the IEP team considered the use of positive behavioral interventions and supports and other strategies to address behavior.	34 CFR §300.324(a)(2)(i)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	

IDEA: LEA PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
Individualized Education Program (IEP) (Student-level)							
24 (DC CATS 26)	The IEP contains a statement of measurable annual related services goals (in the area(s) of ST, PT, OT, counseling or APE) designed to meet the student's needs that result from his/her disability.	34 CFR §300.320(a)(2)(i)(B)	<ul style="list-style-type: none"> - Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS 		0	Met Requirements	
25 (DC CATS 28)	File contains evidence that ESY was determined on an individual basis.	34 CFR §300.106(a)(2)	<ul style="list-style-type: none"> - Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS 		0	Met Requirements	
26 (DC CATS 34)	If the IEP team determines that the child must take an alternate assessment, the IEP contains benchmarks or short-term objectives.	34 CFR §300.320(a)(2)(ii)	<ul style="list-style-type: none"> - Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS 	<ul style="list-style-type: none"> - Work samples - SEDS progress reports - Benchmark Assessments (e.g., Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments) - PARCC scores - Alt-MSA scores 	0	Met Requirements	
27 (DC CATS 29)	The IEP contains a description of how the child's progress toward meeting the annuals goals will be measured.	34 CFR §300.320(a)(3)(i)	<ul style="list-style-type: none"> - Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS 	<ul style="list-style-type: none"> - Work samples - SEDS progress reports - Benchmark Assessments (e.g., Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments) - PARCC scores - Alt-MSA scores 	0	Met Requirements	
28 (DC CATS 30)	The IEP contains a statement of when the parent(s) will be regularly informed of progress toward the goals.	34 CFR §300.320(a)(3)(ii)	- See DC CATS		0	Met Requirements	
29 (DC CATS 31)	The IEP contains a statement of special education and related services, and supplementary aids and services.	34 CFR §300.320(a)(4)	<ul style="list-style-type: none"> - Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS 	<ul style="list-style-type: none"> - Work samples - SEDS progress reports - Benchmark Assessments (e.g., Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments) - PARCC scores - Alt-MSA scores 	0	Met Requirements	

IDEA: LEA PROGRAM MANAGEMENT AND ADMINISTRATION							
Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
30 (DC CATS 40)	The IEP contains an explanation, if any, to which the student will not participate with nondisabled students in regular education.	34 CFR §300.320(a)(5)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	
31 (DC CATS 33)	If the IEP team determines that the child must take an alternate assessment, the IEP for this student contains a statement of why the student cannot participate in the regular assessment.	34 CFR §300.320(a)(6)(ii)(A)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		1	Finding of Noncompliance	Convene an IEP Team meeting or amend the student's IEP to include a statement of why the student cannot participate in the regular assessment.
Individualized Education Program (IEP) (Student-level)							
32 (DC CATS 35)	The IEP includes the projected date for the beginning of services and modifications, and the anticipated frequency, location, and duration of those services and modifications.	34 CFR §300.320(a)(7)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS	- Work samples - SEDS progress reports - Benchmark Assessments (Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments) - PARCC scores - Alt-MSA scores	0	Met Requirements	
33 (DC CATS 32)	The IEP includes a statement that the student has been informed of his/her rights that will transfer to the student on reaching the age of majority.	34 CFR §300.320(c)	- See DC CATS		1	Finding of Noncompliance	Obtain and file documentation of notification to student.
34 (DC CATS 36)	An IEP was developed within 30 days of a determination that the student needs special education and related services.	34 CFR §300.323(c)(1)	- See DC CATS		1	Finding of Noncompliance	Not correctable at the student level.
35 (DC CATS 37)	As soon as possible following development of the IEP, related services were made available to the student in accordance with his/her IEP.	34 CFR §300.323(c)(2)	- See DC CATS		3	Finding of Noncompliance	Develop a plan that addresses missed related services or specialized instruction hours.
36 (DC CATS Other Findings)	Related services were delivered to the student in accordance with his/her IEP in the period specified in the review.	34 CFR §300.323(c)(2)	- See DC CATS		5	Finding of Noncompliance	Develop a plan that addresses missed related services or specialized instruction hours.

IDEA: LEA PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
Individualized Education Program (IEP) (Student-level)							
37 (DC CATS 38)	The student's IEP is reviewed periodically, but not less than annually to determine whether the annual goals for the student are being achieved.	34 CFR §300.324(b)(1)(i)	- See DC CATS	- Work samples - SEDS progress reports - Benchmark Assessments (e.g., Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments) - PARCC scores - Alt-MSA scores	0	Met Requirements	
Indicator 11: Least Restrictive Environment (LRE) (Student-level)							
38 (DC CATS 39)	In selecting the LRE, there was consideration of any harmful effects on the student or on the quality of services needed.	34 CFR §300.116(d)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		1	Finding of Noncompliance	Reconvene IEP team or amend IEP to include documentation in the justification section of the IEP that harmful effects were considered by the IEP team.
39 (DC CATS 40)	The IEP contains an explanation of the extent, if any, to which the student will not participate with non disabled students in regular education.	34 CFR §300.320(a)(5)	- See DC CATS		0	Met Requirements	
40 (DC CATS 41)	Supplemental aids and services were used before removing the student from the regular education environment.	34 CFR §300.114(a)(2)(ii)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	
41 (DC CATS 42)	The student's placement is based on his/her IEP.	34 CFR §300.116(b)(2)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	

IDEA: LEA PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
Indicator 12: Discipline (Student-level)							
42 (DC CATS 43)	The parent, subgrantee, and relevant members of the IEP team met within 10 school days of the decision to remove the student to determine if the behavior was a manifestation of the student's disability.	34 CFR §300.530(e)	<ul style="list-style-type: none"> - Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS 		0	Met Requirements	
43 (DC CATS 44)	On the date that a decision was made to make a removal that constitutes a change of placement, the parent was notified and provided with a copy of the procedural safeguards.	34 CFR §300.530(h)	<ul style="list-style-type: none"> - Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS 		0	Met Requirements	

In accordance with Individuals with Disabilities Act (IDEA) and as part of OSSE's Risk Based Monitoring, OSSE conducted onsite visits to three (3) different District of Columbia Public Schools. The purpose of each review was to observe DCPS' practices in the development of compliant AND quality Individualized Education Plans (IEPs) for students with disabilities. Specifically, OSSE monitored the implementation of data collection and progress monitoring in relation to a student's IEP in the academic areas of reading and math.

As a part of the visit, OSSE visited three (3) different DCPS schools; one (1) elementary, one (1) middle school and one (1) high school. Each visit included file reviews of previously selected students. The files reviewed included student's IEPs as well as formal and informal assessments provided by the individual schools.

All findings in this report will be issued in DCCATS under "other findings." All corrective action items are supplementary to any corrections notated in DCCATS.

IDEA Part B Onsite Monitoring Report

District of Columbia Public Schools

Indicator	Evidence	OBSERVATIONS	Corrective Action(s)
GUIDING QUESTION	<i>Does the student's PLAAFP include current and accurate data?</i>		
<p>DCCATS Report Category: Other Finding</p> <p>Present Levels of Academic Achievement and Functional Performance</p> <p>The IEP Team must consider—(i) The strengths of the child; (ii) The concerns of the parents for enhancing the education of their child; (iii) The results of the initial or most recent evaluation of the child; and (iv) The academic, developmental, and functional needs of the child. 34 CFR 300.324(a)</p>	<p>Work samples</p> <p>Benchmark Assessments (Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments)</p> <p>PARCC scores/Alt-MSAA scores</p> <p>Educational/Achievement Testing</p> <p>Specific inquiries:</p> <p>Is the PLAAFP updated from the previous year?</p> <p>Are there current (within one year) assessment results (formal or informal) in the PLAAFP for each academic area of need?</p> <p>Is there data available in the student's file to support results in the PLAAFP?</p>	<p>The IDEA Monitoring and Compliance Team reviewed a total of ten (10) files at the following DCPS Schools: Payne Elementary, LaSalle-Backus EC and Dunbar HS. OSSE monitoring staff observed the following concerns while reviewing the PLAAFP section of students' IEPs:</p> <ul style="list-style-type: none"> - 60 percent of files contained a PLAAFP copied word-for-word from previous year with no changes; - 10 percent of files contained a PLAAFP copied word-for-word from previous year with minimal i.e. grade and/or age of the student; and - 80 percent of files did not contain supporting documentation to justify students' PLAAFP. <p>These percentages indicate noncompliant practices related to IEP development at the school level.</p> <p>Student level information will be available to the LEA via Box.</p>	<p>In order to close this finding, the LEA must reconvene the IEP team and revise the IEP to include a PLAAFP with current and accurate information about the student's academic and functioning performance. Each PLAAFP should include data from recent assessments (within one calendar year). Once updated, the LEA must revisit the IEP to ensure that reading and math goals are aligned. The LEA must notify Debra Melville at Debra.Melville@dc.gov when files have been updated. All files must be updated within one calendar year.</p> <p>In addition, to ensure staff have the appropriate knowledge about developing PLAAFPs that accurately represent students' needs, the LEA must designate staff to attend OSSE's Quality IEP series training. This series will train staff to use data to do the following: describe students' present levels of performance; set IEP goals, design appropriate accommodations, modification and supports; and propose appropriate service hours and settings. The following staff members must complete the training series by January 31, 2020:</p> <ul style="list-style-type: none"> - School level - The special education coordinators from Payne ES, LaSalle EC and Dunbar HS; and - Central office level - School support liaisons for IDEA compliance assigned to Payne ES, LaSalle EC and Dunbar HS. <p>The trainings must be completed by January 31, 2020. There will be multiple opportunities to participate in this training series:</p> <ul style="list-style-type: none"> - Summer (July 29 - August 1; registration to be advertised in May) - Fall session (dates TBD; registration to be advertised six (6) weeks prior) <p>OSSE will provide registration information to the Manager of Compliance and Policy once each series is advertised. DCPS staff must register for the training and send documentation of such registration to OSSE five (5) days prior to the training date. OSSE will confirm attendance once the training is complete.</p>

IDEA Part B Onsite Monitoring Report

District of Columbia Public Schools

Indicator	Evidence	OBSERVATIONS	Corrective Action(s)
GUIDING QUESTION	<i>Are the student's goals aligned to current and accurate data present in the PLAAFP?</i>		
<p>DCCATS Report Category: Other Finding</p> <p>Annual Goals</p> <p>The IEP contains a statement of measurable annual goals (aside from related services goals) designed to meet the student's needs that result from his/her disability.</p>	<p>Work samples</p> <p>Benchmark Assessments (Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments) PARCC scores/Alt-MSAA scores Educational/Achievement Testing</p> <p>Specific inquiries: Do the goals align to data in the PLAAFP?</p>	<p>The IDEA Monitoring and Compliance Team reviewed a total of ten (10) files at the following DCPS Schools: Payne Elementary, LaSalle-Backus EC and Dunbar HS. OSSE monitoring staff observed the following concerns while reviewing students' annual goals:</p> <p>- 70 percent of the files contained annual goals that were not aligned to students' needs that result from his/her disability (as based on the student's updated PLAAFP).</p> <p>These percentages indicate noncompliant practices related to IEP development at the school level. <i>Please note that if a student's PLAAFP was not updated from previous year, annual goals were automatically identified as not aligned.</i></p> <p>Student level information will be available to the LEA via Box.</p>	<p>In order to close this finding, the LEA must reconvene the IEP team and revise the IEP to include reading and math goals that align with the PLAAFP. The LEA must notify Debra Melville at Debra.Melville@dc.gov when files have been updated. All files must be updated within one calendar year.</p> <p>In addition, to ensure that school staff have the appropriate knowledge about aligning goals to students' needs, the LEA must designate staff to attend OSSE's Quality IEP series training. This series will train staff to use data to do the following: describe students' present levels of performance; set IEP goals, design appropriate accommodations, modification and supports; and propose appropriate service hours and settings. The following staff members must complete the training series by January 31, 2020:</p> <p>- School level - The special education coordinators from Payne ES, LaSalle EC and Dunbar HS; and</p> <p>- Central office level - School support liaisons for IDEA compliance assigned to Payne ES, LaSalle EC and Dunbar HS.</p> <p>There will be multiple opportunities to participate in this training series:</p> <p>- Summer (July 29 - August 1; registration to be advertised in May)</p> <p>- Fall session (dates TBD; registration to be advertised six (6) weeks prior)</p> <p>OSSE will provide registration information to the Manager of Compliance and Policy once each series is advertised. DCPS staff must register for the training and send documentation of such registration to OSSE five (5) days prior to the training date. OSSE will confirm attendance once the training is complete.</p>

IDEA Part B Onsite Monitoring Report

District of Columbia Public Schools

Indicator	Evidence	OBSERVATIONS	Corrective Action(s)
GUIDING QUESTION	<i>Is there evidence that the student's progress is being measured on how well they are meeting their annual goals?</i>		
<p>DCCATS Report Category: Other Finding</p> <p>Progress Monitoring & Reporting</p> <p>The IEP contains a description of how the child's progress toward meeting the annual goals will be measured.</p>	<p>Work samples</p> <p>Benchmark Assessments (Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments)</p> <p>PARCC scores/Alt-MSAA scores</p> <p>Educational/Achievement Testing</p> <p>Specific inquiries:</p> <p>Are the student's progress reports completed?</p> <p>Is there data to support progress as documented in progress reports?</p>	<p>The IDEA Monitoring and Compliance Team reviewed files at the following DCPS Schools: Payne Elementary, LaSalle-Backus EC and Dunbar HS. OSSE monitoring staff observed the following concerns while reviewing progress reporting and monitoring for students:</p> <ul style="list-style-type: none"> - 50 percent of files did not contain completed student progress reports; and - 0 percent of student files contained evidence of data used to determine progress as part of progress monitoring reports. <p>These percentages indicate noncompliant practices related to IEP development at the school level.</p> <p>Student level information will be available to the LEA via Box.</p>	<p>To ensure that school staff have the appropriate knowledge about monitoring and reporting student progress, the LEA must designate staff to attend the following staff to OSSE's Quality IEP series training. This series will train staff to use data to do the following: describe students' present levels of performance; set IEP goals, design appropriate accommodations, modification and supports; and propose appropriate service hours and settings. The following staff members must complete the training series by January 31, 2020:</p> <ul style="list-style-type: none"> - School level - The special education coordinators from Payne ES, LaSalle EC and Dunbar HS; and - Central office level - School support liaisons for IDEA compliance assigned to Payne ES, LaSalle EC and Dunbar HS. <p>There will be multiple opportunities to participate in this training series:</p> <ul style="list-style-type: none"> - Summer (July 29 - August 1; registration to be advertised in May) - Fall session (dates TBD; registration to be advertised six (6) weeks prior) <p>OSSE will provide registration information to the Manager of Compliance and Policy once each series is advertised. DCPS staff must register for the training and send documentation of such registration to OSSE five (5) days prior to the training date. OSSE will confirm attendance once the training is complete.</p>

StdUSI	School	Is the PLOP updated from the previous year?	Is there data available to support results in the PLAAFP?	Do the goals align to current and accurate data?	Are the student's progress reports complete?	Is there data to support progress as documented in the student's progress reports?
	Payne	No	No	No	Yes	No
	Payne	Yes	No	Yes	Yes	No
	LaSalle Backus	Yes	Yes	Yes	Yes	No
	LaSalle Backus	Yes	Yes	Yes	Yes	No
	LaSalle Backus	No	No	No	Yes	No
	Dunbar	No	No	No	No	No
	Dunbar	No	No	No	No	No
	Dunbar	No	No	No	No	No
	Dunbar	No	No	No	No	No
	Dunbar	Yes but minimal	No	No	No	No
Student files that need to be updated as part of the corrective action						

NOTE: In 2012-13, OSSE began using the District of Columbia Corrective Action Tracking System (DC CATS), a web-based application, to track IDEA compliance and the correction of noncompliance on behalf of LEAs. The results of the IDEA portion of your LEA's most recent on-site monitoring visit are released via DC CATS. The following IDEA section of this consolidated on-site monitoring report is only for informational purposes and is intended to provide the LEA with a quick summary of the results of the most recent on-site monitoring visit. All activities regarding the correction of identified noncompliance must be completed in DC CATS.

DC CATS can be accessed using this link: <https://dccats.spedsis.com/>

IDEA: FISCAL MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
Indicator 1: IDEA-Specific Fiscal Requirements						
1.1-F-IDEA	If applicable, the subgrantee procured, utilized, and charged construction expenses to its IDEA grants in a manner consistent with its approved application.	34 CFR §300.718	- IDEA Phase II application approval and applicable supporting documentation (On file at OSSE).	N/A	N/A	
1.2-F-IDEA	If applicable, the subgrantee utilized IDEA funds for providing Coordinated Early Intervening Services (CEIS) for appropriate uses.	34 CFR §§300.226 and 300.646	- On file at OSSE	- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts	Met Requirements	
1.3-F-IDEA	If applicable, the subgrantee properly tracked students who receive CEIS.	34 CFR §§300.226 and 300.646	- On file at OSSE		Met Requirements	
1.4-F-IDEA	The subgrantee has sought reimbursement for activities related to parentally placed private school students with disabilities approved within its IDEA application. (DCPS Only)	34 CFR §300.134	- On file at OSSE	N/A	Met Requirements	
1.5-F-IDEA	The subgrantee will provide LEA MOE workbook evidence that the funds provided to an LEA under IDEA Part B were not to be used to reduce the level of expenditures for the education of children with disabilities made by the LEA from local funds below the level of those expenditures for the preceding year.	34 CFR §300.203(b)		- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts	Met Requirements	

IDEA: FISCAL MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
1.6-F-IDEA	The subgrantee has complied with the requirement to establish eligibility for an IDEA award by budgeting at least the same total or per capita amounts from local funds as the LEA spent with local funds for the most recent prior year for which information is available.	34 CFR §300.203(a)	- On file at OSSE	N/A	Met Requirements	
1.7-F-IDEA	If applicable to the subgrantee and if requested, the entity can provide evidence showing previous audit findings have been addressed.	2 CFR §200.501	- On file at OSSE	N/A	Met Requirements	

NOTE: In 2012-13, OSSE began using the District of Columbia Corrective Action Tracking System (DC CATS), a web-based application, to track IDEA compliance and the correction of noncompliance on behalf of subgrantees. The results of the IDEA portion of your subgrantees most recent on-site monitoring visit will be released via DC CATS. The following IDEA section of this consolidated on-site monitoring report is only for informational purposes and is intended to provide the subgrantee with a quick summary of the results of the most recent on-site monitoring visit. All activities regarding the correction of identified noncompliance must be completed in DC CATS.

DC CATS can be accessed using this link: <https://dccats.spedsis.com/>

The results included in the LEA Program Management and Administration section are based on the results of the student file review portion of the on-site monitoring visit. If less than 80 percent of the files reviewed for each area are deemed compliant, the subgrantee must complete an additional agency-level corrective action. Please note that the agency-level corrective actions are in addition to any individual student-level corrective actions that are required in the student-level section of the IDEA report below. To resolve student level corrective actions, there are two stages, or prongs. Both Prong 1 and Prong 2 correction must occur as soon as possible, but no later than one year from the date of notification of noncompliance. To complete the Prong 1 correction, when a subgrantee receives written notification of a finding of noncompliance through DC CATS, the LEA must first correct the individual student level noncompliance. Next, the subgrantee must demonstrate that it is now correctly implementing the specific regulatory requirement, which OSSE determines through the Prong 2 review. To complete Prong 2, OSSE reviews additional data through another file review in SEDS. OSSE has identified a few additional pieces of evidence needed for our review as indicated below. Otherwise all items must be submitted through DC CATS.

IDEA(PROGRAM CORRECTIONAL): LEA PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			

Least Restrictive Environment (LRE) (LEA-level)

1 (DC CATS 1)	The subgrantee has a continuum of alternative placements available, including instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions.	34 CFR §300.301	- Special Education Handbook - Special Education Staff Roster			Met Requirements	
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Individual Education Program (IEP) (LEA-level)

2 (DC CATS 2)	Youth who do not attend the regular school because of safety or medical reasons receive comparable services based on their IEP.	34 CFR §§300.301, 300.530(d), and 300.115(b)(1)	- See DC CATS			Met Requirements	
3 (DC CATS 3)	Youth attend the school at the facility (YSC, JYP or DYRS) at the earliest possible time or receive comparable services while awaiting enrollment in the school, unless documentation is available showing why neither option was possible (e.g., student was at court or hearing on specific date).	34 CFR §§300.101, 300.2(b), and 300.323(e)(f)	- See DC CATS			Finding of Noncompliance	The LEA must provide make up services for all missed services.
4 (DC CATS 4)	The subgrantee ensures that student IEPs are accessible to all who are responsible for their implementation (e.g., regular education teachers, special education teachers, and related service providers).	34 CFR §300.323(d)(1)	-Special Education Handbook			Finding of Noncompliance	The LEA must develop a plan, policy or practice to ensure that all individuals responsible for the implementation of IEPs have access to the students' IEPs.

Data (LEA-level)

5 (DC CATS 5)	The subgrantee has made all documents related to the individual student file reviews accessible in SEDS.	34 CFR §300.211	- See DC CATS			Met Requirements	
6 (DC CATS 6)	The subgrantee responds to requests for data in a timely manner.	34 CFR §300.211	- See DC CATS			Met Requirements	

IDEA(PROGRAM CORRECTIONAL): LEA PROGRAM MANAGEMENT AND ADMINISTRATION							
Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
Teacher Certification							
7 (DC CATS 7)	Special education staff at the school are certified or credentialed by OSSE for the services they provide, in accordance with District of Columbia Regulations.	34 CFR §§300.18 and 300.149(a)(2)(ii)	- Evidence that all special education staff hold the required certification - Teaching certificates			Finding of Noncompliance	The LEA must ensure all special education staff hold the required certification.
Dispute Resolution (LEA-level)							
8 (DC CATS 8)	The subgrantee provides information to OSSE regarding State complaints within 10 days of request.	OSSE State Complaint Policy				N/A	
9 (DC CATS 9)	The subgrantee timely implements corrective actions contained in the State complaint decision letter.	34 CFR §§300.600(a) and 300.200	- See DC CATS			N/A	
National Instructional Materials Accessibility Standards (NIMAS) (LEA-level)							
10 (DC CATS 10)	The subgrantee provides instructional materials to blind students or other students with print disabilities.	34 CFR §300.172	- See DC CATS			N/A	
STUDENT FILE REVIEW							
Initial Evaluation and Reevaluation							
11 (DC CATS 12)	The student has gone through the initial evaluation or reevaluation process within the past three years.	34 CFR §303(a)(2)(b)(2)	- See DC CATS		0	Met Requirements	
12 (DC CATS 13)	Upon initial referral, or parent request for evaluation, parents were provided procedural safeguards.	34 CFR §300.504(a)(1)	- See DC CATS			N/A	
13 (DC CATS 14)	The signature for parent consent was obtained prior to the initial evaluation.	34 CFR §300.300(a)	- See DC CATS			N/A	
14 (DC CATS 15)	A variety of assessment tools and strategies were used to gather relevant functional, developmental, and academic information about the child, including information provided by the parent.	34 CFR §300.304(b)(1)	- See DC CATS			N/A	
15 (DC CATS 16)	The signature for parent consent was obtained prior to the date of reevaluation.	34 CFR §300.300(c)(1)	- See DC CATS		5	Finding of Noncompliance	Not correctable at the student level.
16 (DC CATS 17)	A variety of sources were used to determine eligibility.	34 CFR §300.306(c)	- See DC CATS		0	Met Requirements	

IDEA (PROGRAM CORRECTIONAL): LEA PROGRAM MANAGEMENT AND ADMINISTRATION							
Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
Individualized Education Program (IEP) (Student-level)							
17 (DC CATS 18)	Parent/student was invited to the most recent IEP meeting.	34 CFR §300.322(a)(1)	- See DC CATS		0	Met Requirements	
18 (DC CATS 19)	Parent/student was notified of IEP meeting early enough to ensure they will have an opportunity to attend.	34 CFR §300.322(a)(1)	- See DC CATS		1	Finding of Noncompliance	Not correctable at the student level.
19 (DC CATS 20)	As evidence of parent participation, the individual who signed IEP meets the definition of "parent" in 34 CFR §300.30.	34 CFR §300.30	- See DC CATS		0	Met Requirements	
20 (DC CATS 21)	General education teacher, unless excused, attended the IEP meeting.	34 CFR §§300.321(a) and 300.321(e)	- See DC CATS		8	Finding of Noncompliance	Not correctable at the student level.
21 (DC CATS 22)	Special education teacher, unless excused, attended the IEP meeting.	34 CFR §§300.321(a) and 300.321(e)	- See DC CATS		5	Finding of Noncompliance	Not correctable at the student level.
22 (DC CATS 23)	The subgrantee designee, unless excused, attended the IEP meeting.	34 CFR §§300.321(a) and 300.321(e)	- See DC CATS		6	Finding of Noncompliance	Not correctable at the student level.
23 (DC CATS 24)	An individual who can interpret evaluation results, who may be a member of the team described in indicators 19-22, attended the IEP meeting, unless excused.	34 CFR §§300.321(a) and 300.321(e)	- See DC CATS		10	Finding of Noncompliance	Not correctable at the student level.
24 (DC CATS 25)	IEP includes a Present Level of Academic Achievement and Functional Performance (PLAAFP) that states how disability affects involvement in general curriculum (ages 6-21) or how the disability affects student's involvement in appropriate activities (ages 3-5).	34 CFR §300.320(a)(1)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS	- Work samples - SEDS progress reports - Benchmark Assessments (e.g., Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments) - PARCC scores - Alt-MSA scores	3	Finding of Noncompliance	Convene an IEP meeting or amend the student's IEP so that it includes a PLAAFP that demonstrates how disability affects involvement and progress in general curriculum.
25 (DC CATS 26)	The IEP contains a statement of measurable annual goals (aside from related service(s) goals) designed to meet the student's needs that result from his/her disability.	34 CFR §300.320(a)(2)(i)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	

IDEA (PROGRAM CORRECTIONAL): LEA PROGRAM MANAGEMENT AND ADMINISTRATION							
Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
26 (DC CATS 28)	In the event that the student's behavior impedes the learning of the student or other students, the IEP team considered the use of positive behavioral interventions and supports and other strategies to address behavior.	34 CFR §300.324(a)(2)(i)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	
27 (DC CATS 27)	The IEP contains a statement of measurable annual related services goals (in the area(s) of ST, PT, OT, counseling or APE) designed to meet the student's needs that result from his/her disability.	34 CFR §300.320(a)(2)(i)(B)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	
28 (DC CATS 29)	File contains evidence that ESY was determined on an individual basis.	34 CFR §300.106(a)(2)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		3	Finding of Noncompliance	Provide evidence that ESY was determined on an individual basis.
29 (DC CATS 35)	If the IEP Team determines that the child must take an alternate assessment, the IEP contains benchmarks or short-term objectives.	34 CFR §300.320(a)(2)(ii)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	
30 (DC CATS 30)	The IEP contains a description of how the child's progress toward meeting the annuals goals will be measured.	34 CFR §300.320(a)(3)(i)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS	- Work samples - SEDS progress reports - Benchmark Assessments (e.g., Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments) - PARCC scores - Alt-MSA scores	0	Met Requirements	
31 (DC CATS 31)	The IEP contains a statement of when the parent(s) will be regularly informed of progress toward the goals.	34 CFR §300.320(a)(3)(ii)	- See DC CATS		2	Finding of Noncompliance	Convene an IEP meeting or amend the student's IEP so it includes a statement of when the parent(s) will be regularly informed of progress.
32 (DC CATS 32)	The IEP contains a statement of special education and related services, and supplementary aids and services.	34 CFR §300.320(a)(4)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS	- Work samples - SEDS progress reports - Benchmark Assessments (e.g., Read 180, SRI, Lexile Scores, Literacy and Math Benchmark Assessments) - PARCC scores - Alt-MSA scores	0	Met Requirements	

IDEA(PROGRAM CORRECTIONAL): LEA PROGRAM MANAGEMENT AND ADMINISTRATION							
Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
33 (DC CATS 41)	The IEP contains an explanation, if any, to which the student will not participate with nondisabled students in regular education.	34 CFR §300.320(a)(5)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	
34 (DC CATS 34)	If the IEP Team determines that the child must take an alternate assessment, the IEP for this student contains a statement of why the student cannot participate in the regular assessment.	34 CFR §300.320(a)(6)(ii)(A)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	
35 (DC CATS 36)	The IEP includes the projected date for the beginning of services and modification and the anticipated frequency, location, and duration of those services and modifications.	34 CFR §300.320(a)(7)	- See DC CATS		0	Met Requirements	
36 (DC CATS 33)	The IEP includes a statement that the student has been informed of his/her rights, that will transfer to the student on reaching the age of majority.	34 CFR §300.320(c)	- See DC CATS		0	Met Requirements	
37 (DC CATS 37)	An IEP was developed within 30 days of a determination that the student needs special education and related services.	34 CFR §300.323(c)(1)	- See DC CATS		0	Met Requirements	
38 (DC CATS 38)	Related services were delivered to the student in accordance with his/her IEP in the period specified in the review.	34 CFR §300.323(c)(2)	- See DC CATS		4	Finding of Noncompliance	Develop a plan that addresses missed related services or specialized instruction hours.

IDEA(PROGRAM CORRECTIONAL): LEA PROGRAM MANAGEMENT AND ADMINISTRATION							
Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
39 (DC CATS 39)	The student's IEP is reviewed periodically, but not less than annually to determine whether the annual goals for the student are being achieved.	34 CFR §300.324(b)(1)(i)	- See DC CATS		1	Finding of Noncompliance	Convene the IEP Team to review and renew the student's IEP.
Indicator 11: Least Restrictive Environment (LRE) (Student-level)							
40 (DC CATS 40)	In selecting the LRE, there was consideration of any harmful effects on the student or on the quality of services needed.	34 CFR §300.116(d)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	
41 (DC CATS 42)	Supplemental aids and services were used before removing the student from the regular education environment.	34 CFR §300.114(a)(2)(ii)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		1	Finding of Noncompliance	Reconvene IEP team or amend IEP to include documentation that education in the regular education environment cannot be achieved satisfactorily with the use of supplementary aids and services.
42 (DC CATS 43)	The student's placement is based on his/her IEP.	34 CFR §300.116(b)(2)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor - Evidence required by DC CATS		0	Met Requirements	
Indicator 12: Discipline							
43 (DC CATS 44)	The parent, subgrantee and relevant members of the IEP team met within 10 school days of the decision to remove the student to determine if the behavior was a manifestation of the student's disability.	34 CFR §300.530(e)	- See DC CATS			N/A	
44 (DC CATS 45)	On the date that a decision was made to make a removal that constitutes a change of placement, the parent was notified and provided with a copy of the procedural safeguards.	34 CFR §300.530(h)	- See DC CATS			N/A	

IDEA (PROGRAM CORRECTIONAL): LEA PROGRAM MANAGEMENT AND ADMINISTRATION							
Indicator	Guiding Statement	Citation	Evidence		Number of Student Level Findings	Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.			
45 (DC CATS 46)	FAPE provided during suspension.	34 CFR §§300.101(a) and 300.530(d)	- Schedules for students identified by OSSE monitor - Attendance records for students identified by OSSE monitor - Discipline records for students identified by OSSE monitor			N/A	

TITLE I, PART A: PROGRAM MANAGEMENT AND ADMINISTRATION					
Indicator	Guiding Statement	Citation	Evidence	Determination	Remarks
<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (2015).</p>					
<p>Indicator 1. Title I Part A: Improving the Academic Achievement of the Disadvantaged: Standards, Assessment and Accountability</p>					
1.1	The subgrantee demonstrates that it has adopted challenging academic standards and complied with requirements for assessments.	ESEA §1111(b)	- On file with OSSE	Met Requirements	
1.2	The subgrantee identifies languages other than English that are present to a significant extent in the participating student population.	ESSA §1111(b)(2)(F)(i)	- Evidence of annual Home Language Survey	Met Requirements	
1.3	The subgrantee complies with the State's requirement of completing the Home Language Survey at initial enrollment to identify potential English learners (ELs).	ESEA §1111(b)(2)(G)	- Three signed and dated copies of the Home Language Survey received by the subgrantee	Met Requirements	
1.4	The subgrantee ensures that all ELs are annually assessed to determine English language proficiency and that the assessments used are aligned with the State's English language proficiency standards.	ESEA §1111(b)	- Evidence that ELs participate in statewide and district assessments -Assessment policy and procedures	Met Requirements	
<p>Indicator 2. Title I Part A: Improving the Academic Achievement of the Disadvantaged</p>					
2.1	The subgrantee's parental and family engagement policy (all LEAs) and School-Parent Compact (DCPS only) are developed with meaningful consultation with parents; the policy is updated, as needed; and parents and family members of children receiving services are involved in the decisions regarding how parental involvement funds are used for parental involvement activities.	ESEA §1116	- Dated subgrantee parent and family engagement policy for current year - Dated sample school-level parent family engagement policy for current year (for subgrantees with multiple school sites, provide 1-2 school level parent family engagement policy(ies)) - Dated School Parent Compact (DCPS only)	Finding of Noncompliance	<p>Finding: The LEA provided an LEA-level Parents Right to Know Guide, Back to School Night Title I Annual Meeting sign-in sheets from one sampled school, Title I meeting presentation slides from one sampled school, Principal Guidance on Title I provided by the LEA to all school leaders, a copy of the Title I letter sent to parents at one sampled school, Title I grant agreements between three sampled schools and the LEA's central office, a Local School Advisory Team (LSAT) agenda for a budget meeting and attendance for one sampled school to indicate parent participation in the development of the Title I spending plan for that school.</p> <p>However, for the 2017-18 school year, the LEA failed to provide samples of a school-level parent and family engagement policy for each grade span and evidence of meaningful consultation with parents regarding development of the LEA-level policy or the sampled school-level policies. The LEA also failed to provide evidence that the LEA-wide Parents Right to Know Guide and the sampled school-level Title I letter sent to parents were provided in the most commonly used languages other than English. Lastly, the LEA failed to provide evidence of school-parent compacts for any sampled school. These compacts were stated in the LEA Parents Right to Know Guide to be a component of the school-level parent and family engagement policies required for all schools.</p> <p>Citation: As required by ESEA §1116(b)(1) and (d), "Each school served under this part shall jointly develop with, and distribute to, parents and family members of participating children a written parent and family engagement policy, agreed on by such parents, that shall describe the means for carrying out the requirements of subsections (c) through (f). Parents shall be notified of the policy in an understandable and uniform format and, to the extent practicable, provided in a language the parents can understand. Such policy shall be made available to the local community and updated periodically to meet the changing needs of parents and the school." (d) "As a component of the school-level parent and family engagement policy developed under subsection (b), each school served under this part shall jointly develop with parents for all children served under this part a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards.</p> <p>Action Required: Within 30 days, the LEA must submit a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - A description of how parents will contribute to the LEA-level and school-level parent and family engagement policies; - A description of how the LEA will distribute information on the parental and family engagement policies to parents; and - A description of how the LEA will provide parents with the Parents Right to Know Guide and the school-level Title I letters in the most commonly used languages other than English. <p>By October 31, 2019, the LEA must submit a copy of its LEA-level and school-level parent and family engagement policies.</p>
2.1(a)	The subgrantee reviews the effectiveness of the parental and family engagement policy.	ESEA §1116(a)(2)(D)	- Evidence that the subgrantee reviewed the policy and determined, if revisions were needed (e.g., agendas, sign-in sheets, meeting minutes, surveys, interviews, and policy revisions)	Finding of Noncompliance	<p>Finding: The LEA failed to provide any evidence that either the LEA-level or school-level parent and family engagement policies were reviewed to determine their effectiveness for the 2017-18 school year.</p> <p>Citation: As required by ESEA §1116(a)(2)(D), "Each local educational agency that receives funds under this part shall develop jointly with, agree on with, and distribute to, parents and family members of participating children a written parent and family engagement policy. The policy shall be incorporated into the local educational agency's plan developed under section 1112, establish the agency's expectations and objectives for meaningful parent and family involvement, and describe how the agency will— conduct, with the meaningful involvement of parents and family members, an annual evaluation of the content and effectiveness of the parent and family engagement policy in improving the academic quality of all schools served under this part, including identifying— (i) barriers to greater participation by parents in activities authorized by this section (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background); (ii) the needs of parents and family members to assist with the learning of their children, including engaging with school personnel and teachers; and (iii) strategies to support successful school and family interactions."</p> <p>Action Required: Within 30 days, the LEA must submit a plan for school year 2019-20 that indicates how the LEA will evaluate and revise the LEA-level parent and family engagement policies.</p>

TITLE I, PART A: PROGRAM MANAGEMENT AND ADMINISTRATION					
Indicator	Guiding Statement	Citation	Evidence	Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (2015).			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.	
2.1(b)	<p>(DCPS only) The parental and family engagement policy demonstrates that the subgrantee and schools have carried out the six requirements to build parents' capacity to be involved in school:</p> <ul style="list-style-type: none"> - Provided assistance to parents of children in understanding such topics as the challenging State academic standards, State and local academic assessments, and how to monitor a child's progress and work with educators to improve the achievement of their children; - Provided materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology (including education about the harms of copyright piracy), as appropriate, to foster parental involvement; - Educated teachers, specialized instructional support personnel, principals, and other school leaders, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school; - Coordinated and integrated parent involvement programs and activities with other federal, State, and local programs, including public preschool programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children, to the extent feasible and possible; - Ensured that information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand; and - Provided such other reasonable support for parental involvement activities under this section as parents may request. - Other reasonable support (subgrantee supports parent requests for 	ESEA §1116 (e)	<p>Evidence of the following from the OSSE identified schools (schools will be identified at least four weeks prior to monitoring):</p> <ul style="list-style-type: none"> - Evidence of family engagement activities, including materials provided and sign-in sheets. - Sample of 3-5 parent-teacher communication logs - Evidence of teacher materials sent home to parents and families with strategies to support learning - Agendas, sign-in sheets and materials used to train principals and teachers in effective parent engagement strategies and raising expectations for how teachers engage parents for each OSSE school identified - Evidence of information provided on the subgrantee website detailing information on the state standards and assessments and information about Title I programs - Evidence of parent workshops provided by schools for parents focused on literacy, math, reading, homework help, and study skills for each OSSE school identified. 	Finding of Noncompliance	<p>Finding: The LEA provided an LEA-level Parents Right to Know Guide, Back to School Night Title I Annual Meeting sign-in sheets from one sampled school, Title I meeting presentation slides from one sampled school, Principal Guidance on Title I provided by the LEA to all school leaders, a copy of the Title I letter sent to parents at one sampled school, Title I grant agreements between three sampled schools and the LEA's central office, and a Local School Advisory Team (LSAT) agenda for budget meeting and attendance for one sampled school to indicate parent participation in the development of the Title I spending plan for that school.</p> <p>The LEA failed to provide evidence that schools have carried out the six requirements to build parent capacity for involvement for the 2017-18 school year.</p> <p>Citation: As required by ESEA §1116(e)(1-5) and (14), "To ensure effective involvement of parents and to support a partnership among the school involved, parents, and the community to improve student academic achievement, each school and local educational agency assisted under this part—(1) shall provide assistance to parents of children served by the school or local educational agency, as appropriate, in understanding such topics as the challenging State academic standards, State and local academic assessments, the requirements of this part, and how to monitor a child's progress and work with educators to improve the achievement of their children; (2) shall provide materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology (including education about the harms of copyright piracy), as appropriate, to foster parental involvement; (3) shall educate teachers, specialized instructional support personnel, principals, and other school leaders, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school; (4) shall, to the extent feasible and appropriate, coordinate and integrate parent involvement programs and activities with other Federal, State, and local programs, including public preschool programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children; (5) shall ensure that information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand; . . . (14) shall provide such other reasonable support for parental involvement activities under this section as parents may request."</p> <p>Action Required: Within 30 days, the LEA must submit a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - A description of how the LEA will provide assistance to parents on challenging State academic standards; - A description of the materials in which the LEA will provide to parents to help improve their child's achievement; - A description of how the LEA will communicate with parents to implement and coordinate parent programs, in addition to how the LEA will improve ties between parents and the school; - A description of how parent and family engagement programs and activities will coordinate with other Federal, State, and local programs; - A description of how the LEA will ensure that parent and family engagement activities, presentation materials, and handouts are made available in a language that parents can understand; and - A description of how the LEA will determine other reasonable support for family engagement activities.
2.1(c)	The subgrantee offers a flexible number of meetings, such as meetings in the morning or evening and may provide, with funds provided under this part, transportation, child care, or home visits as such services related to parental involvement:	ESEA §1116(c)(2)	<ul style="list-style-type: none"> - Meeting notices - Documentation related to any funds used for parental involvement (transportation, child care, etc.) - Documentation of home visits, if applicable - Sign-in sheets 	Finding of Noncompliance	<p>Finding: The LEA failed to provide evidence of parent and family engagement events for the 2017-18 school year.</p> <p>Citation: As required by ESEA §1116(c)(2), "Each school served under this part shall—(2) offer a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement."</p> <p>Action Required: Within 30 days, the LEA must submit a plan for the 2019-20 school year that indicates how the LEA will offer various meeting times for parent and family engagement activities and the Title I annual meetings. The plan may also indicate how the LEA will provide information on transportation, child care, or home visits to encourage participation.</p>
2.2	The subgrantee communicates with parents regarding their child's participation in the language instruction program in an understandable and uniform format and in the parents' primary language.	ESEA §1112(e)(4)	<ul style="list-style-type: none"> - Three samples of parent notification letters in the parent's native language - Proof of mailing 	Met Requirements	

TITLE I, PART A: PROGRAM MANAGEMENT AND ADMINISTRATION					
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<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (2015).</p>					
			<p>Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.</p> <p>On-Site Documents: These documents must be made available to OSSE during the monitoring visit.</p>		
2.3	The subgrantee has implemented an effective means of outreach to inform parents of ELs of how they can be involved in the education of their children in the parent's native language and be active participants in assisting their children to learn.	ESEA §1112(e)(3)(C)(i)	<ul style="list-style-type: none"> -Meeting/ training schedules -Examples of outreach communications 	Met Requirements	
2.4	The subgrantee holds regular meetings and sends parents of ELs notices of such meetings for the purpose of formulating and responding to recommendations from parents.	ESEA §1112(e)(3)(C)(ii)	Copies of notices, in the parent's native language, notifying parents of meetings to respond to recommendations from parents	Met Requirements	
2.5	Schoolwide Schools: The subgrantee ensures that schools develop and implement a compliant schoolwide plan under ESSA and use the schoolwide flexibility to improve the academic achievement of all students in the school.	ESEA §1114(b)	<p>Documentation that plan was developed in a one year period (unless otherwise exempted by the law) from the OSSE identified schools:</p> <ul style="list-style-type: none"> - Agendas, sign-in sheets, notes, planning documents - Documentation that the plan was developed with the involvement of parents, other members of the community to be served, and individuals who will carry out the plan (teachers, principals, school leaders, etc.) - Schoolwide plan and revisions, agendas, sign-in sheets, meeting minutes - Documentation that the plan is available to subgrantee, parents, and public, and provided to parents in a language they can understand, and translated for stakeholders - Documentation of the coordination and integration of federal, State and local funds, if appropriate and applicable - Documentation that the plan is based on a comprehensive needs assessment of the entire school that takes into account information on the academic achievement of children in relation to challenging State academic standards - Plan includes a description of strategies school will be implemented to address school needs, and if programs are consolidated, the specific SEA and subgrantee programs and other federal programs that will be consolidated in the schoolwide program 	Finding of Noncompliance	<p>Finding: The LEA failed to submit evidence of needs assessments and schoolwide plans for the sample of schools (one elementary, one middle, and one high school) for the 2017-18 school year.</p> <p>Citation: As required by ESEA §1114(b)(2) and (6), "An eligible school operating a schoolwide program shall develop a comprehensive plan (or amend a plan for such a program that was in existence on the day before the date of the enactment of the Every Student Succeeds Act) that— (2) is developed with the involvement of parents and other members of the community to be served and individuals who will carry out such plan, including teachers, principals, other school leaders, paraprofessionals present in the school, administrators (including administrators of programs described in other parts of this title), the local educational agency, to the extent feasible, tribes and tribal organizations present in the community, and, if appropriate, specialized instructional support personnel, technical assistance providers, school staff, if the plan relates to a secondary school, students, and other individuals determined by the school; (6) is based on a comprehensive needs assessment of the entire school that takes into account information on the academic achievement of children in relation to the challenging State academic standards, particularly the needs of those children who are failing, or are at-risk of failing, to meet the challenging State academic standards and any other factors as determined by the local educational agency."</p> <p>Action Required: Within 30 days, the LEA must submit a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - A description of the process to develop schoolwide plans; - A description of how the plans will be developed with the involvement of parents, other members of the community to be served, and individuals who will carry out the plan, such as: teachers, principals, school leaders, etc.; and - A description of how the LEA will make schoolwide plans available to parents and public in a language that parents can understand.
2.6	Targeted Assistance Schools: The subgrantee ensures that all targeted assistance schools develop and implement targeted assistance plans that meet all the ESSA required elements.	ESEA §1115	<ul style="list-style-type: none"> - Description of how the subgrantee determines which students will be served - Documentation of multiple educationally related, objective criteria for eligible students at each grade level targeted, list of Title I teachers, targeted assistance school-level plans - Description of how eligible students will be served, which may include the following: <ul style="list-style-type: none"> - Description of coordination with regular education program - Description of professional development provided to teachers, principals, school leaders, paraprofessionals, and other school personnel who work with eligible children in targeted assistance programs or in the regular education program - Documentation of implementation of strategies to increase parent involvement - Documentation of coordination and integration of federal, State, and local services and programs where appropriate and applicable 	Met Requirements	

TITLE I, PART A: PROGRAM MANAGEMENT AND ADMINISTRATION					
Indicator	Guiding Statement	Citation	Evidence	Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (2015).			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.	
2.7	The subgrantee has a current approved Local Education Plan with all required components.	ESEA §1112	- On file at OSSE	Met Requirements	
2.8	The subgrantee complies with required statutory set-asides for parental involvement (1% for any subgrantee that receives \$500,000 in Title I funds, including the requirement that 90% of funds are distributed to schools.	ESEA §1116 (a)(3)(A)	- On file at OSSE	Met Requirements	
2.9	Within subgrantee Allocation Procedures (DCPS only). Evidence that the subgrantee complies with requirements with regard to allocating funds to eligible school attendance areas or schools in rank order of poverty based on the number of children from low-income families who reside in an eligible attendance area.	ESEA §1113	- On file at OSSE	Met Requirements	
2.10	Compliance with Equitable Services to Nonpublic School Student's Requirements (DCPS only). The subgrantee must meet the requirements for Title I with regard to the plan, design, and implementation of services to eligible private school children, their teachers and their families.	ESEA §§1117 and 8501	- Consultation meeting documentation, agendas, sign-sheets, meeting minutes, and supplemental handouts - Signed affirmations of consultation - Program evaluation - Detailed services delivery plan - Private school handbook	Met Requirements	
2.10(a)	The subgrantee conducted timely and meaningful consultation prior to making any decisions regarding the plan, design, and implementation of services to eligible private school children, their teachers, and their families.	ESEA §§1117(b) and 8501	- Consultation meeting documentation, agendas, sign-sheets, meeting minutes, and supplemental handouts - Signed affirmations of consultation - Notice of disagreement, if applicable - Detailed services delivery plan	Finding of Noncompliance	<p>Finding: The LEA failed to provide written affirmations that consultation meetings occurred with each private school and that such meetings covered all elements required by the law. The LEA did provide:</p> <ul style="list-style-type: none"> - City-Wide Consultation Agendas from three meetings (5/19/17, 10/26/17, 1/18/18) - Sign-in sheet from the 10/26/17 meeting - A handout from the 10/26/17 meeting - A follow-up email from the 1/18/18 meeting (dated 1/23/18) - A follow-up email from the 10/26/17 meeting (dated 11/2/18) <p>The LEA also provided the following from the 31 participating private schools:</p> <ul style="list-style-type: none"> - Signed Affirmations of Consultation (AOCs), or the equivalent, from 13 schools that indicated all elements of consultation required by the law had been discussed by the private school official, or another official designated to represent the school. <p>Following the release of the Preliminary Monitoring Report, the LEA provided additional evidence, that was received on May 22, 2019, including several AOCs and duplicate AOCs from the same school. When comparing the duplicate AOCs, it became clear that for nine schools, one version was incomplete, and the other was complete. For each of these schools, an incomplete form had been presented during on-site monitoring. OSSE emailed the LEA's Director of Federal Programs and Grants on May 28, 2019 to ask why there were duplicate forms with conflicting information. The LEA's Director of Federal Programs and Grants responded on May 29, 2019 that they had asked the private school administrators to re-sign and re-date the forms to indicate that all of the required elements were discussed. On May 30, 2019, Whitney Meagher (OSSE) contacted three of the schools with duplicate forms. Each reported that DCPS had not been in contact with them recently about documentation from previous years.</p> <p>Citation: As required by ESEA §1117(b), the LEA must engage in timely and meaningful consultation with private school officials during the design and development of programs. These meetings shall occur before the LEA makes any significant decisions about service delivery and continue throughout implementation and assessment of services. Such consultation meetings shall include a discussion of service delivery mechanisms. The LEA shall maintain in the agency's records and provide to the State educational agency involved a written affirmation signed by officials of each participating private school that the consultation required by this section has occurred.</p> <p>Action Required: Beginning July 5, 2019, and by the 5th of each month for the 2019-20 school year, the LEA must submit to OSSE a list of their scheduled consultation visits for the following month. Additionally, within five business days of each consultation meeting with a private school official, DCPS must provide a copy of meeting notes, and a signed AOC form that indicates all required elements of consultation were discussed. OSSE will notify the LEA as to where this information should be sent moving forward.</p> <p>OSSE is continuing to review this matter and may require that additional steps be taken by the LEA.</p>
2.10(b)	The subgrantee complies with requirements for selecting children to receive equitable services.	ESEA §1117	- Rubric - Ranking eligibility data forms - Proportionality data of attendance - Sample email documentation - Completed tool used to rank and determine which students receive services - Sample student participation letter - List of participating schools	Met Requirements	
2.10(c)	The subgrantee properly calculates poverty data.	ESEA §1117	- Sample of method used to calculate poverty data	Met Requirements	
2.10(d)	The subgrantee ensures that service providers are employees of the subgrantee or employees of a third party contractor.	ESEA §1117	- Contracts for each service provider and employment agreements for equitable services, as appropriate. - Copies of documentation for ID Badges and for fingerprinting requirement - Documentation of required training - Documentation that required providers have completed child abuse training	Met Requirements	

TITLE I, PART A: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence	Determination	Remarks	
<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (2015).</p>						
			<p>Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.</p> <p>On-Site Documents: These documents must be made available to OSSE during the monitoring visit.</p>			
2.10(e)	The subgrantee maintains documentation to show that all teachers and/or paraprofessionals employed by the subgrantee who provide services to private school children meet ESSA requirements.	ESEA §1117		<p>Evidence that all teachers and/or paraprofessionals employed by the subgrantee who provide services to private school children meet the ESEA requirements including, but not limited to, the following:</p> <ul style="list-style-type: none"> - Copies of certificates (degrees), as applicable - Evidence of training - Copy of written agreement 	Met Requirements	
2.10(f)	The subgrantee maintains documentation of evaluations for all programs serving private school students and modifies programs, as necessary.	ESEA §1117		<ul style="list-style-type: none"> - Evidence that the subgrantee evaluated all programs serving private school students - Evidence that the subgrantee made modifications to the monitoring process, observations, and providers' evaluation, as necessary - Monthly providers' reports, and copies of meeting minutes 	Finding of Noncompliance	<p>Finding: The LEA failed to provide evidence that it academically evaluated all programs serving private school students, or that necessary modifications were made to program delivery based on the evaluation findings.</p> <p>During the interview, the LEA discussed the use of Stride Academy as a way to continually evaluate the academic performance of participating private school students. The contracted service provider, Performance Management Services, LLC, (PMS) and administrators at each school have access to this program. Additionally, PMS provides administrators with a report of student academic results 2-3 times per year. However, the LEA did not provide evidence of these reports or the activities described.</p> <p>The LEA also provided evidence of evaluations of vendor performance.</p> <p>Citation: As required by §1117(b)(D), "[t]o ensure timely and meaningful consultation, a local education agency shall consult with appropriate private school officials during the design and development of such agency's programs under this part...Such process shall include consultation on issues such as--...how the services will be academically assessed and how the results of that assessment will be used to improve those services."</p> <p>Action Required: Within 30 days the LEA must submit a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - how the LEA will share the results of the academic evaluation for each student with each school (i.e. samples of PMS reports on student academic performance) - how the LEA modified the program delivery based upon the result of the student academic evaluations, as applicable (i.e. meeting notes that show academic performance and related program changes were discussed with private school administrators).
2.10(g)	The subgrantee properly maintains records for third party contracts and invoices from third party contractors.	34 CFR §76.730		- Copies of contracts for each service provider on file and copies of invoices representing each contractor.	Met Requirements	
2.10(h)	The subgrantee maintains control of the Title I funds, materials, equipment and property that support services to private school children.	ESEA §1117; 34 CFR §76.651		<p>Evidence that the subgrantee supervises and controls the Title I funds, materials, equipment and property that support services to private school children including, but not limited to, the following:</p> <ul style="list-style-type: none"> - Inventory Listing - Program Equipment Assessment Form - Description of the oversight process - Record of reconciling workbook submissions with approved budget - Sample letters, invoices, and individual tracking 	Met Requirements	
2.10(i)	The subgrantee has policies and procedures to ensure Title I funded materials and equipment located at the private school (1) are used only for the purposes of the project; and (2) can be removed from the private school without remodeling the private school facility.	34 CFR §76.661		- List of equipment with tags, labels, inventory check list, and location. Applicable policies and procedures.	Met Requirements	
2.10(j)	The subgrantee uses Title I, Part A services, materials, and equipment for secular, neutral, and non-ideological instruction only with Title I served students.	ESEA §1117(a)(2)		- Evidence that Title I, Part A services, materials, and equipment are used for secular, neutral, and non-ideological instruction only with Title I served students	Met Requirements	
2.10(k)	The subgrantee determines reserved funding for equitable services using a percentage of the total public and private school student enrollment (Title I only).	ESEA §1117		<ul style="list-style-type: none"> - Narrative description of formula used to determine amount of each reserve - Evidence of the methodology used for the equitable services calculation 	Met Requirements	
2.11	The subgrantee ensures that homeless students enrolled in non-Title I schools receive Title I services.	ESEA §1113(c) (3)(A)(i)	On file at OSSE		Met Requirements	
Indicator 3. General Grants Management Administration (Program)						
3.1	A subgrantee disseminates OSSE's Complaint Policy to parents of students, and appropriate private school officials or representatives.	34 CFR §299.11(d)		- Evidence of dissemination of OSSE's complaint policy to parents of students, and appropriate private school officials or representatives (e.g., website posting, student handbook, evidence of distribution at school meeting).	Finding of Noncompliance	<p>Finding: The LEA failed to provide evidence that it disseminated OSSE's complaint policy to parents. The LEA did provide a copy of a complaint policy in its Parents Right to Know Guide for the 2017-18 school year, but the policy fails to share information about OSSE's complaint policy.</p> <p>Citation: As required by 34 CFR §299.11(d), LEAs are required to "disseminate, free of charge, adequate information about the complaint procedures to parents of students, and appropriate private school officials or representatives."</p> <p>Action Required: Within 30 days, the LEA must provide a plan for the 2019-20 school year that indicates how the LEA will disseminate OSSE's complaint policy to parents.</p>
3.2	A subgrantee maintains documentation that complaints were resolved.	2 CFR §200.331(d)		- If applicable, correspondence that complaints were resolved (e.g., email, letters)	Met Requirements	

TITLE I, PART A: FISCAL MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015.			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
Indicator 1: Specific Fiscal Requirements						
1.1-F-TitleI	Comparability: Evidence that the subgrantee complied with the requirement to provide state and local resources in Title I schools that are comparable to the services provided in non-Title I schools (DCPS only).	ESSA §1118(c)(1)(A)	- On file at OSSE		Met Requirements	
1.2-F-TitleI	Evidence that the subgrantee did not carry over more than the allowable 15% limit on carryover.	ESSA §1127(a)	- On file at OSSE		Met Requirements	
1.3-F-TitleI	Supplement Not Supplant (school-level expenditures): The subgrantee, as applicable, can demonstrate that its written methodology ensures that all state/local funding is distributed to schools regardless of whether schools receive Title I funding. For additional guidance, see: https://osse.dc.gov/sites/default/files/dc/sites/osse/page_content/attachments/ESSA%20Title%20I%20Supplement%20Not%20Supplant%20_OSSE%20Guidance%20for%20LEAs.pdf .	ESSA §1118(b)(2)	Either: 1) ESSA test- Written methodology demonstrating a neutral allocation of state/local resources to all schools within the District. Sample documents demonstrating actual school-level allocation of funding to Title I and non-Title I schools that align with the written methodology. B) Three NCLB tests, proving that each individual Title I cost in a school did not replace local fund costs or use Title I funds to meet other laws. For more information on demonstrating compliance with the SNS test under NCLB, visit: https://osse.dc.gov/publication/esea-title-i-schoolwide-guidance		Indeterminate	This indicator is currently under review by OSSE.
1.4-F-TitleI	Supplement Not Supplant (LEA-level expenditures): The subgrantee can demonstrate that all LEA-level expenditures are allocated on a neutral basis to all schools regardless of their Title I status and without taking into account school-level Title I funding. For additional guidance, see: https://osse.dc.gov/sites/default/files/dc/sites/osse/page_content/attachments/ESSA%20Title%20I%20Supplement%20Not%20Supplant%20_OSSE%20Guidance%20for%20LEAs.pdf .	ESSA §1118(b)(2)	Either: 1) ESSA test- Written methodology demonstrating a neutral allocation of LEA-level expenditures to schools within the LEA, regardless of each school's Title I status. Sample evidence of LEA-level initiatives, state/local expenditures, and other supporting documentation. B) NCLB tests, proving that each individual LEA-level Title I cost did not replace local fund costs or use Title I funds to meet other laws. For more information on the NCLB methods of meeting the SNS requirement for LEA-level spending, see pp. 37-41 of the U.S. Department of Education's (USED's) 2008 Fiscal Guidance at http://www2.ed.gov/programs/titleiparta/fiscalguid.doc		Indeterminate	This indicator is currently under review by OSSE.
1.5-F-TitleI	The subgrantee can demonstrate that funds for the current grant period were obligated within the period of availability.	34 CFR §§76.707-76.710, 2 CFR §§200.77, 200.309		- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts	Met Requirements	
1.6-F-TitleI	The subgrantee can demonstrate that grant expenditures were necessary, reasonable, allocable, and only for authorized purposes.	2 CFR §§200.403 - 200.405		- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts	Met Requirements	

TITLE I, PART A: FISCAL MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015.			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
1.7-F-TitleI	Schoolwide Schools: The subgrantee can demonstrate that school-level expenditures are aligned to a school's schoolwide plan.	ESSA §1114(b)		- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts	Met Requirements	
1.8-F-TitleI	Targeted Assistance Schools: The subgrantee can demonstrate that school-level expenditures are aligned to a school's targeted assistance plan, as applicable, and that Title I funded services are only provided to identified Title I students, teachers and parents.	ESSA §1115(b)		- Subgrantee source documentation to support OSSE's expenditure sample requests such as invoices, receipts, contracts	Met Requirements	

TITLE II, PART A: PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015.</p>						
<p>Indicator 1. Title II Part A: Improving Teacher Quality</p>			<p>Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.</p>	<p>On-Site Documents: These documents must be made available to OSSE during the monitoring visit.</p>		
1.1	The subgrantee has a current approved Local Education Plan with all required components.	ESEA §2102(b)	- On file at OSSE		Met Requirements	
<p>Indicator 2. General Grants Management Administration (Program)</p>						
2.1	The subgrantee provides for the equitable participation of private school teachers and other educational personnel in private schools and engages in timely meaningful consultation with private school officials during the design and development of Title II programs (DCPS only).	ESEA §§2102(b)(2)(E); 8501(a)		<ul style="list-style-type: none"> - Consultation meeting agendas - Sign-in sheets - Meeting minutes - Supplemental handouts - Detailed service delivery plan 	<p>Finding of Noncompliance</p>	<p>Finding: The LEA failed to provide written affirmations that consultation meetings occurred with each private school and that such meetings included all elements required by the law. The LEA did provide:</p> <ul style="list-style-type: none"> - City-Wide Consultation Agendas from three meetings (5/19/17, 10/26/17, 1/18/18) - a Sign-In Sheet from the 10/26/17 meeting - a handout from the 10/26/17 meeting ("City-Wide Consultation Questions and Answers") - A follow-up email from the 1/18/18 meeting (dated 1/23/18) - A follow-up email from the 10/26/17 meeting (dated 11/2/18) <p>The LEA provided the following from the 30 participating private schools:</p> <ul style="list-style-type: none"> - Signed affirmations of consultation (AOCs) from 14 schools that indicated all elements of consultation required by the law had been discussed. However, the LEA did not provide signed AOCs that indicated that all elements of consultation required by law had been discussed with all participating schools as required. <p>Following the release of the Preliminary Monitoring Report, the LEA provided additional evidence that was received on May 22, 2019 including several AOCs and duplicate AOCs from the same school. When comparing the duplicate AOCs, it became clear that for ten schools, one version was incomplete, and the other was complete. For each of these schools, an incomplete form had been presented during on-site monitoring. OSSE emailed the LEA's Director of Federal Programs and Grants on May 28, 2019 to ask why there were duplicate forms with conflicting information. The LEA's Director of Federal Programs and Grants responded on May 29, 2019 to say that they had asked the administrators to re-sign and re-date the forms to indicate that all of the required elements were discussed. On May 30, 2019, Whitney Meagher (OSSE) contacted three of the schools with duplicate forms. Each reported that DCPS had not been in contact with them recently about documentation from previous years.</p> <p>Citation: As required by ESEA §8501(c), the LEA must engage in timely and meaningful consultation with private school officials during the design and development of programs. These meetings shall occur before the LEA makes any significant decisions about service delivery and continue throughout implementation and assessment of services. Such consultation meetings shall include a discussion of service delivery mechanisms. The LEA shall maintain in the agency's records and provide to the State educational agency involved a written affirmation signed by officials of each participating private school that the consultation required by this section has occurred.</p> <p>Action Required: Beginning July 5, 2019, and by the 5th of each month for the 2019-20 school year, the LEA must submit to OSSE a list of their scheduled consultation visits for the following month. Additionally, within five business days of each consultation meeting with a private school official, DCPS must provide a copy of meeting notes, and a signed AOC form that indicates all required elements of consultation were discussed. OSSE will notify the LEA as to where this information should be sent moving forward.</p> <p>OSSE is continuing to review this matter and may require that additional steps be taken by the LEA.</p>
2.2	The subgrantee develops systems of professional growth and improvement, such as induction for teachers, principals, or other school leaders and opportunities for building capacity of teachers and opportunities to develop meaningful teacher leadership.	ESEA §2102(b)(2)(B)		<ul style="list-style-type: none"> - Agendas - Sign- sheets - Documentation that meetings occurred (e.g., minutes, presentation materials) - Training materials - Calendar of professional development activities that improve and increase teachers' knowledge of the academic subjects teachers teach. 	<p>Finding of Noncompliance</p>	<p>Finding: The LEA provided PDF files of feedback from professional development surveys conducted in August 2017 and October 2017, respectively. The LEA also provided electronic files of LEAP coaching session presentations and handouts, sample templates, and a LEAP Leader roster for school year 2018-19. However, the LEA failed to provide evidence of systems developed for professional growth and improvement for the 2017-2018 school year.</p> <p>Citation: As required by ESEA §2102(b)(2)(B), "A description of the local educational agency's systems of professional growth and improvement, such as induction for teachers, principals, or other school leaders and opportunities for building the capacity of teachers and opportunities to develop meaningful teacher leadership."</p> <p>Action Required: Within 30 days, the LEA must provide a plan for the 2019-20 school year that indicates how the LEA will develop systems of professional growth and improvement for teachers, principals, and other school leaders.</p>
2.3	The subgrantee meaningfully consults with teachers, principals and other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders, parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the statutory purpose of Title II, Part A.	ESEA §2102(b)(3)(A)		<ul style="list-style-type: none"> - Agendas - Sign-in sheets - Sample surveys or evaluations - Presentation materials 	<p>Finding of Noncompliance</p>	<p>Finding: The LEA failed to provide evidence that it engaged key stakeholders identified in ESEA §2102(b)(3)(A) in meaningful consultation regarding the professional development plan.</p> <p>Citation: As required by ESEA §2102(b)(3)(A), "In developing the application described in paragraph (2), a local educational agency shall— (A) meaningfully consult with teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders (in a local educational agency that has charter schools), parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of this title."</p> <p>Action Required: Within 30 days, the LEA must provide a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - A description of which stakeholders will be involved in the evaluation of its professional development activities; and - A description of how the LEA will document stakeholder feedback.
2.4	The subgrantee uses data and ongoing consultation to continually update and improve activities supported under this part.	ESEA §2102(b)(2)(D)		<ul style="list-style-type: none"> - Evidence that data was reviewed to continually update and improve activities 	<p>Finding of Noncompliance</p>	<p>Finding: The LEA failed to provide evidence that it evaluated its professional development plan during the 2017-18 school year and revises it on an on-going basis.</p> <p>Citation: As required by ESEA §2102(b)(2)(D), "Each application submitted under paragraph (1) shall include the following: (D) A description of how the local educational agency will use data and ongoing consultation described in paragraph (3) to continually update and improve activities supported under this part."</p> <p>Action Required: Within 30 days, the LEA must provide a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - A description of how the LEA will evaluate its professional development activities on an on-going basis; and - A description of which stakeholders will be involved in the evaluation of its professional development activities.

TITLE II, PART A: PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015.						
2.5	Title II, Part A activities shall address the learning needs of all students, including children with disabilities, English learners, and gifted and talented students.	ESEA §2103(b)(2)	Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit. - PD Calendar	Finding of Noncompliance	Finding: The LEA failed to provide evidence of professional development activities to address the needs of all students including children with disabilities, English learners, and gifted and talented students for the 2017-18 school year. Citation: As required by ESEA §2103(b)(2), "The programs and activities described in this subsection— (2) shall address the learning needs of all students, including children with disabilities, English learners, and gifted and talented students." Action Required: Within 30 days, the LEA must provide a copy of its PD calendar related to addressing the needs of all students including children with disabilities, English learners, and gifted and talented students for the 2019-20 school year.

TITLE II, PART A: FISCAL MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
Indicator 1: Specific Fiscal Requirements						
1.1-F-TitleII	The subgrantee can demonstrate that funds for the current grant period were obligated within the period of availability.	34 CFR §§76.707-76.710, 2 CFR §§200.77 and 200.309		- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts	Met Requirements	
1.2-F-TitleII	The subgrantee can demonstrate that grant expenditures were necessary, reasonable, allocable, and only for authorized purposes.	2 CFR §§200.403 - 200.405		- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts	Met Requirements	
1.3-F-TitleII	The subgrantee can demonstrate that Title II, Part A funds were used for allowable program purposes.	2 CFR §200.403		- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts	Met Requirements	
1.4-F-TitleII	Supplement Not Supplant: The subgrantee ensures that funds made available under this title shall be used to supplement, and not supplant, non-federal funds that would otherwise be used for activities authorized under this title (in alignment with OSSE's guidance on supplement not supplant requirements). For additional guidance, please see https://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/OSSE%20Federal%20Grants%20Toolkit%20Aug.%202018%2C%202017.pdf .	ESEA §2301		- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices or budgets demonstrating use of non-federal funds	Met Requirements	
1.5-F-TitleII	Evidence that the subgrantee demonstrated that the level of State and local funding remains constant from year to year (Maintenance of Effort reporting requirement) (DCPS only).	ESEA §8521	- On file at OSSE		Met Requirements	
1.6-F-TitleII	If applicable to the subgrantee, and if requested, the subgrantee can provide evidence showing previous audit findings have been addressed.	2 CFR §200.501	- Evidence that the subgrantee resolved audit findings (if applicable)		Met Requirements	

TITLE III: PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence	Determination	Remarks
<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).</p>					
			<p>Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.</p>	<p>On-Site Documents: These documents must be made available to OSSE during the monitoring visit.</p>	
<p>Indicator 1. Identification, Placement and Program Exit: Subgrantees must identify and place English learners (ELs) in appropriate programs.</p>					
1.1	The subgrantee communicates with parents regarding their child's participation in the language instruction program in an understandable and uniform format and in the parents' primary language.	ESEA §1112(e)(3)	<p>Evidence of the following from the OSSE identified schools:</p> <ul style="list-style-type: none"> -Samples of parent notification letters including all required elements listed in ESEA §1112(e)(3) -Evidence of having sent letters to parents, including evidence of mailing 	Met Requirements	
<p>Indicator 2. Appropriate Programs: Subgrantees must implement high-quality language instruction educational programs for ELs and evaluate their effectiveness.</p>					
2.1	The subgrantee has a comprehensive written EL plan of services, in place.	ESEA §§3116	- On file at OSSE	Met Requirements	
2.2	The subgrantee implements the program/project in accordance with the subgrantee's approved application.	ESEA §3116 and 2 CFR §200.33(d)	-Documentation that the subgrantee EL-identified activities are aligned with approved application (e.g., curriculum documents, meeting agendas, meeting minutes, academic progress data)	Met Requirements	
2.3	The programs and activities are evaluated to determine effectiveness (the evaluation must be conducted every two years).	ESEA §3121 (a) - (b)	<ul style="list-style-type: none"> -Minutes from data retreats/meetings -Written evaluations -Evidence of necessary adjustments made to the program 	Met Requirements	
2.4	Elementary and/or secondary school language instruction educational programs for ELs are coordinated with other relevant programs and services.	ESEA §3115(d)(4)	-Evidence the subgrantee coordinated EL instruction with other relevant programs and services (e.g., curriculum materials, evidence of lesson planning, professional development, team planning documents.)	Met Requirements	
2.5	If applicable, the subgrantee has implemented specific programs for immigrant children and youth.	ESEA §3115(e)	<ul style="list-style-type: none"> - Documentation of program implementation of activities (i.e., progress notes, tutoring minutes, invoice payments, sign-in sheets), which may include: <ul style="list-style-type: none"> - family literacy, parent and family outreach, and training activities designed to assist parents and families to become active participants in the education of their children; - recruitment of, and support for, personnel, including teachers and paraprofessionals who have been specifically trained, or are being trained, to provide services to immigrant children and youth; - provision of tutorials, mentoring, and academic or career counseling for immigrant children and youth; - identification, development, and acquisition of curricular materials, educational software, and technologies used in the program carried out with awarded funds; - basic instructional services that are directly attributable to the presence of immigrant children and youth; -(F) other instructional services that are designed to assist immigrant children and youth to achieve in elementary schools and secondary schools; -(G) activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents and families of immigrant children and youth by offering comprehensive community services. 	N/A	

TITLE III: PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence	Determination	Remarks
<p>Indicator 3. Appropriate Staffing and Professional Development</p>					
<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).</p>					
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.	
3.1	The subgrantee assures that all teachers in any language instruction program for ELs are fluent in English and in any other language used for instruction, including having written and oral communication skills.	ESEA §3116(c)	-Description and documentation related to the subgrantee's teacher hiring process.	Met Requirements	
3.2	The subgrantee provided professional development that is aligned with § 3115(c)(2).	ESEA §3115(c)(2)	-PD Calendar -Agendas from trainings -Sign-in sheets from trainings -Training materials	Met Requirements	
<p>Indicator 4. Parent Involvement: Subgrantees must involve parents and community in the planning, development and implementation of the language instruction education program.</p>					
4.1	The subgrantee has implemented an effective means of outreach to inform parents of ELs of how they can be involved in the education of their children and be active participants in assisting their children learn.	ESEA §1112(e)(3)(C)(i)		- Meeting/training schedules for parent activities - Examples of parent communications - Process/plan for communicating to parents on how they access the EL program, be involved in their child's education, and be active participants in their child's learning.	Met Requirements
4.2	The subgrantee holds regular meetings with parents of ELs for the purpose of responding to their recommendations.	ESEA §1112(e)(3)(C)(ii)	-Copies of notices sent to parents asking for parents' input and responding to it or promotional materials -Dated presentation materials -Agendas -Sign-in sheets -Meeting minutes	Met Requirements	
4.3	The subgrantee promotes parental and community participation in the planning, development, and implementation of the parent involvement program and programs for ELs.	ESEA §3116(b)(3)	-Dated presentation materials -Agendas -Sign-in sheets -Meeting minutes	Met Requirements	
<p>Indicator 5. English Language Proficiency (ELP) Standards</p>					
5.1	The subgrantee assists ELs in meeting the challenging WIDA English Language Proficiency Standards.	ESEA §3116(b)	Evidence of professional development on English Language Proficiency standards, including: -Agendas	Met Requirements	

TITLE III: PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).</p>						
			<p>Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.</p>	<p>On-Site Documents: These documents must be made available to OSSE during the monitoring visit.</p>		
<p>Indicator 6. Non-Public School Participation in Language Instruction Education Program: The subgrantee must include non-public school participation in language instruction education programs. (DCPS Only)</p>						
<p>6.1</p>	<p>The subgrantee has consulted with non-public schools to identify English learners that are located in the geographic area served by the subgrantee.</p>	<p>ESEA §8501(c)</p>	<p>-A description of the consultation process -A timeline of district-initiated consultation with non-public schools -Copies of meeting agendas -Letters of intent to participate, if applicable -Affirmation of consultation with non-public school officials including student selection criteria</p>		<p>Finding of Noncompliance</p>	<p>Finding: The LEA failed to provide written affirmations that consultation meetings occurred with each private school and that such meetings covered all elements required by the law, including consultation to identify English learners that are located in the geographic area covered by the subgrantee. The LEA did provide:</p> <ul style="list-style-type: none"> - City-Wide Consultation Agendas from three meetings (5/19/17, 10/26/17, 1/18/18) - Sign-In Sheet from the 10/26/17 meeting - A handout from the 10/26/17 meeting ("City-Wide Consultation Questions and Answers") - A follow-up email from the 1/18/18 meeting (dated 1/23/18) - A follow-up email from the 10/26/17 meeting (dated 11/2/18) <p>The LEA further provided the following from the 13 participating private schools:</p> <ul style="list-style-type: none"> - Signed affirmations of consultation (AOCs) from eight schools that indicated all elements of consultation required by the law had been discussed. However, the LEA did not provide signed AOCs that indicated all elements of consultation required by law had been discussed for all participating schools as required. <p>Following the release of the Preliminary Monitoring Report, the LEA provided additional evidence that was received on May 22, 2019 including several AOCs and duplicate AOCs from the same school. When comparing the duplicate AOCs, it became clear that for four schools, one version was incomplete, and the other was complete. For each of these schools, an incomplete form had been presented during on-site monitoring. OSSE emailed the LEA's Director of Federal Programs and Grants on May 28, 2019 to ask why there were duplicate forms with conflicting information. The LEA's Director of Federal Programs and Grants responded on May 29, 2019 to say that they had asked the administrators to re-sign and re-date the forms to indicate that all of the required elements were discussed. On May 30, Whitney Meagher (OSSE) was able to contact three of the schools with duplicate forms. Each reported that DCPS had not been in contact with them recently about documentation from previous years</p>
<p>6.1 CONT'D</p>						<p>Citation: As required by ESEA §8501(c), the LEA must engage in timely and meaningful consultation with private school officials during the design and development of programs. These meetings shall occur before the LEA makes any significant decisions about service delivery and continue throughout implementation and assessment of services. Such consultation meetings shall include a discussion of service delivery mechanisms. The LEA shall maintain in the agency's records and provide to the State educational agency involved a written affirmation signed by officials of each participating private school that the consultation required by this section has occurred.</p> <p>Action Required: Beginning July 5, 2019, and by the 5th of each month for the 2019-20 school year, the LEA must submit to OSSE a list of their scheduled consultation visits for the following month. Additionally, within five business days of each consultation meeting with a private school official, DCPS must provide a copy of meeting notes, and a signed AOC form that indicates all required elements of consultation were discussed. OSSE will notify the LEA as to where this information should be sent moving forward.</p> <p>OSSE is continuing to review this matter and may require that additional steps be taken by the LEA.</p>

TITLE III: PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
6.2	The subgrantee has consulted with appropriate non-public school officials during the design and development of the Title III program.	ESEA §8501(c)(3)	1. Evidence of process for providing technical assistance to nonpublic schools on how to: <ul style="list-style-type: none"> - Identify English learners - Determine size and scope of services - Administer English language proficiency assessments and statewide assessments with accommodations 2. Written communication with non-public schools regarding providing equitable services to eligible students 3. Description of the consultation process 4. Evidence of assessment of non-public students and evaluation of effectiveness of services 5. Documentation of how non-public students are identified 6. Documentation of how teachers' needs were identified		Met Requirements	
6.3	The subgrantee ensures equitable participation by non-public students in a Title III program.	ESEA §8501(a)	-Program description -Sample schedules of nonpublic students		Met Requirements	
6.4	Evidence that the subgrantee complies with requirements of equitable services to nonpublic schools including but not limited to timely implementation, evaluation, and program monitoring.	ESEA §8501		1. Affirmations of consultation signed by officials of each participating private school confirming that meaningful consultation occurred. Such written affirmations shall include the option for private school officials to indicate that timely and meaningful consultation has not occurred or that the program design is not equitable with respect to eligible private school children. 2. Documentation that all teachers and/or paraprofessionals employed by the subgrantee who provide services to private school children meet the state licensure and certification requirements (if applicable) such as: <ul style="list-style-type: none"> - Copies of certificates (degrees) - Evidence of reported training - Copy of written agreement 3. Documentation of an evaluation for all programs serving private school students and that modifications are made, as necessary such as: <ul style="list-style-type: none"> - Monitoring process, observations, and providers' evaluation - Monthly providers' reports, and copies of meeting minutes 4. Policies and procedures to ensure the maintenance of record for third party contract(s) and invoices from the third party contractor such as: <ul style="list-style-type: none"> - Copies of contracts for each service provider on file - Copies of invoices representing each contractor 	Met Requirements	

TITLE III: PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
6.4 CONTINUED	CONTINUED	CONTINUED	CONTINUED	5. Documentation that the subgrantee regularly supervises the provision of Title III services to private school children such as: - Description of monitoring process - Copies of observations through on-site visits - Copies of providers' evaluations - Copies of monthly providers' reports, and meeting minutes 6. subgrantee maintains control of the Title III funds, materials, equipment and property that support services to private school children such as: - Inventory check list - Title III Program Equipment Assessment Form - Allocations documentation - Record for tracking subgrantee expenditures through reimbursement process (e.g., workbook submissions) - Sample letters, invoices, and individual tracking 7. If applicable, policies and procedures to ensure Title III funded materials and equipment located at the private school are properly labeled such as: - List of equipment with tags, labels, inventory check list, and location		
6.4 CONTINUED	CONTINUED	CONTINUED	CONTINUED	8. Evidence of awareness of SEA-complaint procedures for private school officials such as: - SEA-complaint procedures stated in DCPS Equitable Services Handbook - Documentation that procedures are disseminated yearly at the citywide consultation 9. Evidence that services, materials, and equipment are used for secular, neutral, and non-ideological instruction only with Title III served students 10. Nonpublic school components of Title III are administered by, and under the control of, the subgrantee such as: - Meetings with private school officials (e.g., agenda, sign-in sheets) - Subgrantee personnel records show hiring of personnel for the nonpublic school Title III program - Documentation of payments for contracts or services - Documentation of regular visits by the subgrantee		
6.4 CONTINUED	CONTINUED	CONTINUED	CONTINUED	11. Evidence that expenditures for educational services and other benefits provided under this section for eligible private school children, their teachers, and other educational personnel serving those children shall be equal, taking into account the number and educational needs of the children to be served, to the expenditures for participating public school children. Such evidence must include the following: - Narrative description of formula used to determine amount of reserve - Evidence of the methodology used for the equitable services calculation		

TITLE III: PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
7. Data Collection Systems						
7.1	If applicable, for Title III Immigrant Children and Youth programs, the subgrantee has a data collection system to ensure that the immigrant student count submitted to OSSE includes only eligible immigrant students.	ESEA §3114(d)	Documentation of data collection procedures		N/A	

TITLE III: FISCAL MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
Indicator 1. District Allocation						
1.1-F-TitleIII	The eligible entity has reserved not more than two percent of its allocation for the administration of the Title III program.	ESEA §3115(b)	-On file at OSSE		Met Requirements	
1.2 -F-TitleIII	The subgrantee uses funds only for required and authorized activities.	ESEA §3115(c)-(d)	-Subgrantee source documentation to support OSSE's expenditure sample request such as such as invoices, receipts, contracts		Met Requirements	
Indicator 2. Maintenance of Effort						
2.1-F-TitleIII	The subgrantee complies with the maintenance of effort fiscal requirement.	ESEA §8521	-On file at OSSE	- On file at OSSE	Met Requirements	
Indicator 3. Supplement Not Supplant						
3.1-F-TitleIII	The subgrantee ensures that federal funds made available under this subpart shall be used so as to supplement the level of federal, State and local public funds that, in the absence of such availability, would have been expended for programs for ELs and immigrant children and youth and in no case to supplant such federal, State, and local public funds. For additional guidance, please see https://osse.dc.gov/node/1267731 .	ESEA §3115(g)	-Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, budgets demonstrating use of state, local and other federal funds.	N/A	Met Requirements	
3.2-F-TitleIII	The subgrantee can demonstrate that grant expenditures were necessary, reasonable, allocable, and only for authorized purposes.	2 CFR §§200.403 - 200.405		-Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts	Met Requirements	

TITLE IV, PART B: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).</p> <p>Note: The documents listed are examples of evidence which the LEA may submit to OSSE to demonstrate compliance. OSSE acknowledges that program operators may demonstrate compliance in varying manner.</p>						
<p>Indicator 1. Title IV Part B: Program Activities</p>						
1.1	<p>The LEA provides evidence describing the structural features of the program including:</p> <ul style="list-style-type: none"> - Staffing (e.g., program director and site coordinator) - Hours of operation - Relevance and intensity of subject area - Attendance of participants - Retention of participants - Student achievement - Partners and contributions - Percentage of minorities and other ethnic populations - Percentage of students in poverty - Percentage of high-need students 	<p>2 CFR §200.210; OSSE 21st Century Community Learning Centers (21st CCLC) Request for Applications (RFA) - Application Guidelines: 21st CCLC Application</p>	<ul style="list-style-type: none"> - Participant lists - 21st CCLC staff list - Activity and lesson plans - Program schedule - Professional development calendar and team - Program policy and procedures 	<ul style="list-style-type: none"> - Student sign-in sheets - Student poverty/minority/high needs data (e.g., LearnDC.org data, survey data, MySchoolDC) 	<p>Met Requirements</p>	
1.2	<p>The LEA provides services to students for a minimum of three hours per day, four days a week, for 25 weeks (300 hours per school year).</p>	<p>2 CFR §200.210; 21st CCLC RFA: Hours and Days of Operation</p>	<ul style="list-style-type: none"> - Program policy and procedures - Activity and lesson plans - Schedules - Calendar 		<p>Met Requirements</p>	
1.3	<p>The LEA enrolled at least 75% of the projected enrollment as documented in the approved application by the end of the second quarter (March 30th) during the prior year of 21st CCLC programming.</p>	<p>2 CFR §200.210; 21st CCLC RFA: Change in the Size of Grant Awards</p>	<ul style="list-style-type: none"> - Participant Lists - Attendance/Sign-In Sheets 	<ul style="list-style-type: none"> - Registration Forms - Interim reports (On file at OSSE) 	<p>Met Requirements</p>	
1.4	<p>The LEA disseminates information about the program to the community in a manner that is understandable and accessible.</p>	<p>ESEA §4204(b)(2)(A)(iii)</p>	<ul style="list-style-type: none"> - Policies and procedures - Communications with community (flyers, newsletters, emails, etc.) 		<p>Met Requirements</p>	

TITLE IV, PART B: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).</p> <p>Note: The documents listed are examples of evidence which the LEA may submit to OSSE to demonstrate compliance. OSSE acknowledges that program operators may demonstrate compliance in varying manner.</p>						
1.5	The LEA uses 21st CCLC award funds to carry out a broad array of activities that advance student academic achievement and support student success, including - (1) academic enrichment learning programs, mentoring programs, remedial education activities, and tutoring services, that are aligned with— (A) the challenging State academic standards and any local academic standards; and (B) local curricula that are designed to improve student academic achievement; (2) well-rounded education activities, including such activities that enable students to be eligible for credit recovery or attainment; (3) literacy education programs, including financial literacy programs and environmental literacy programs; (4) programs that support a healthy and active lifestyle, including nutritional education and regular, structured physical activity programs; (5) services for individuals with disabilities; (6) programs that provide after-school activities for students who are English learners that emphasize language skills and academic achievement; (7) cultural programs; (8) telecommunications and technology education programs; (9) expanded library service hours; (10) parenting skills programs that promote parental involvement and family literacy; (11) programs that provide assistance to students who have been truant, suspended, or expelled to allow the students to improve their academic achievement; (12) drug and violence prevention programs and counseling programs;	ESEA §4205(a)		Recommended Pre-Site Documents	Recommended On-Site Documents	
						Met Requirements
1.5 CONT.	(13) programs that build skills in science, technology, engineering, and mathematics (referred to in this paragraph as “STEM”), including computer science, and that foster innovation in learning by supporting nontraditional STEM education teaching methods; and (14) programs that partner with in-demand fields of the local workforce or build career competencies and career readiness and ensure that local workforce and career readiness skills are aligned with the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) and the Workforce Innovation and Opportunity Act (29 U.S.C. 3101 et seq.).	CONT.	CONT.	CONT.		
1.6	The LEA provides activities that are expected to improve student academic achievement and overall student success.	ESEA §4204(b)(2)(B)	- Activity and lesson plans		- Annual Self Evaluation Report	Met Requirements
1.7	The LEA uses best practices, including research or evidence-based practices, to provide educational and related activities that will complement and enhance academic performance, achievement, postsecondary and workforce preparation, and positive youth development of the students.	ESEA §4204(b)(2)(I)			- Policies and procedures	Met Requirements
1.8	The 21st CCLC program or activity shall - (A) be based upon an assessment of objective data regarding the need for before and after school (or summer recess) programs and activities in the schools and communities; (B) be based upon an established set of performance measures aimed at ensuring the availability of high-quality academic enrichment opportunities; (C) if appropriate, be based upon evidence-based research that the program or activity will help students meet the challenging State academic standards and any local academic standards; (D) ensure that measures of student success align with the regular academic program of the school and the academic needs of participating students and include performance indicators and measures described in section 4203(a)(14)(A); and (E) collect the data necessary for the measures of student success described in subparagraph (D).	ESEA §4205(b)	- Activity and lesson plans - Policies and procedures		- On file at OSSE	Met Requirements
1.9	The LEA program activities are developed and carried out in active collaboration with the schools that participating students attend (including through the sharing of relevant data among the schools), all participants of the eligible entity, and any partnership entities described in subparagraph (H), in compliance with applicable laws relating to privacy and confidentiality.	ESEA §4204(b)(2)(D)	- Activity plans - Policies and procedures		- Needs assessment/evaluation	Met Requirements

TITLE IV, PART B: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).</p> <p>Note: The documents listed are examples of evidence which the LEA may submit to OSSE to demonstrate compliance. OSSE acknowledges that program operators may demonstrate compliance in varying manner.</p>						
1.10	The LEA has a partnership between a local educational agency, a community-based organization, and another public entity or private entity, if appropriate.	ESEA §4204(b)(2)(H)	- On file at OSSE		Met Requirements	
Indicator 2. Title IV Part B: Safety and Accessibility						
2.1	The LEA ensures that the program locations are safe and easily accessible, and allow for availability of services to participants	ESEA §4204(b)(2)(A)(i)	- Special needs accommodation documents - Safety policies and procedures		Met Requirements	
2.2	The LEA ensures that participants will travel safely to and from the centers and home.	ESEA §4204(b)(2)(A)(ii)	- Transportation policy and procedures		Met Requirements	
2.3	The LEA ensures that current background checks and tuberculosis tests were conducted on all employees working directly with 21st CCLC participants.	OSSE's Health Testing Requirements for Children Development Facilities: FOR CENTER EMPLOYEES, HOME PROVIDERS AND RESIDENTS AND VOLUNTEERS - (29 DC Municipal Regulations, Chapter 3, Section 327)		MANDATORY - Background Checks for staff selected by OSSE following review of 21st CCLC staff list provided in Indicator 1.1 - TB Tests for staff selected by OSSE following review of 21st CCLC staff list provided in Indicator 1.1	Met Requirements	
Indicator 3. Title IV Part B: Staff Development						
3.1	The LEA provides professional development based on assessed staff needs.	ESEA §4203(a)(6); 21st CCLC RFA - Application Guidelines, 21st CCLC Application: Criteria 5: Program Management and Implementation	- Policies and procedures - Professional development calendar - Professional development sign-in sheets - Professional development agendas - Needs assessment		Met Requirements	
3.2	The LEA complies with all mandatory professional development and conference requirements.	ESEA §4203(a)(6); 21st CCLC RFA: Professional Development Training		- Sign-in sheets - Agendas - Training materials	Met Requirements	
3.3	The LEA has a plan that will encourage and use appropriately qualified persons to serve as the volunteers in activities carried out through the community learning center.	ESEA §4204(b)(2)(M)	- Policies and procedures		Met Requirements	
Indicator 4. Title IV Part B: Program Eligibility						
4.1	The LEA targets students who primarily attend schools eligible for schoolwide programs under section 1114 and the families of such students.	ESEA §4204(b)(2)(F)	- Policies and procedures		Met Requirements	
4.2	The LEA conducted timely and meaningful consultation with private school officials during the development of the 21st CCLC program or activities.	ESEA §8501(a)(1), et seq. 21st CCLC Non-Regulatory Guidance (Feb. 2003), Question F-16		- On file at OSSE	Met Requirements	

TITLE IV, PART B: PROGRAM MANAGEMENT AND ADMINISTRATION						
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Indicator 5. Title IV Part B: Evaluation and Reporting						
5.1	The LEA conducts a periodic evaluation of its program in conjunction with the State educational agency's overall evaluation plan as described in section 4203(a)(14) to assess the program's progress toward achieving the goal of providing high-quality opportunities for academic enrichment and overall student success.	ESEA §4205(b)(2)(A); 21st CCLC RFA - Application Guidelines, 21st CCLC Application; Criteria 6: Program Evaluation and Monitoring		- Evaluation	Met Requirements	
5.2	The LEA uses an external evaluator.	ESEA §4205(b)(2)(A); 21st CCLC RFA, 21st CCLC RFA, Reporting Requirements: Annual External Evaluation Report		- Evaluation - Policies and procedures - Communications with evaluator	Met Requirements	
5.3	The evaluation: 1. Addresses the established set of performance measures and indicators as approved in the LEA's 21st CCLC application. 2. Addresses particular concerns or needs of the program. 3. Uses a quasi-experimental design or a pre/post or comparison group design. 4. Describes how the program carried out in the center(s) addresses community needs (including the needs of working families).	ESEA §4205(b)(1) & (2); ESEA §4204(b)(2)(I); 21st CCLC RFA - Application Guidelines, 21st CCLC Application; Criteria 6: Program Evaluation and Monitoring		- Evaluation - Policies and procedures - Communications with evaluator	Met Requirements	
5.4	The evaluation incorporates Annual Performance Reporting (APR) data in its analysis. APR data includes: 1. 21st CCLC program participant assessment results; 2. Grades; and 3. Teacher survey results.	ESEA §4205(b)(1) & (2); 21st CCLC RFA - Application Guidelines, 21st CCLC Application; Criteria 6: Program Evaluation and Monitoring		- Evaluation - Policies and procedures - Communications with evaluator	Met Requirements	
5.7	The LEA uses the results of evaluations under subparagraph (A) to refine, improve, and strengthen the program or activity, and to refine the performance measures.	ESEA §4205(b)(2)(B)(i)		- Evaluation - Policies and procedures - Communications with evaluator - Communications describing efforts to make program adjustments based on evaluation - Meeting agendas with evaluator and public	Met Requirements	
5.8	The LEA makes available the results of evaluations to the public upon request, with public notice of such availability provided.	ESEA §4205(b)(2)(B)(ii)		- Evaluation - Policies and procedures - Communications with evaluator - Public notice of the availability to request a copy of evaluation results - Evaluation on LEA website	Finding of Noncompliance	<p>Finding: The LEA did not provide evidence showing that the most recent 21st CCLC annual evaluation was made available to the public.</p> <p>Citation: As required by ESEA §4205, "The results of evaluations under subparagraph (A) shall be— (ii) made available to the public upon request, with public notice of such availability provided."</p> <p>Action Required: Within 30 days, the LEA must submit evidence that a copy of the most recent 21st CCLC annual evaluation is imbedded on DCPS' Out-of-School Time Program (OSTP) webpage. Evidence must include a screenshot of the OSTP webpage with the evaluation and a link to the evaluation on the OSTP webpage.</p>
5.9	The LEA timely submits quarterly performance reports to OSSE.	ESEA §4205(b)(2); 21st CCLC RFA, Reporting Requirements: Interim Reporting		- On file at OSSE	Met Requirements	

TITLE IV, PART B: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).</p> <p>Note: The documents listed are examples of evidence which the LEA may submit to OSSE to demonstrate compliance. OSSE acknowledges that program operators may demonstrate compliance in varying manner.</p>						
Indicator 6. Title IV Part B: Sustainability						
6.1	The LEA has a sustainability plan for how the community learning center will continue after funding under this part ends	ESEA §4204(b)(2)(K); 21st CCLC RFA - Application Guidelines, 21st CCLC Application: Criteria 7: Sustainability	- Policies and procedures		Met Requirements	
6.2	The LEA uses 21st CCLC funds to increase the level of State, local, and other non-federal funds that would, in the absence of funds under this part, be made available for programs and activities authorized under this part, and in no case supplant federal, State, local, or non-federal funds.	ESEA §4204(b)(2)(G)		- Policies and procedures	Met Requirements	
6.3	The LEA demonstrates how the program coordinates federal, State, and local programs and makes the most effective use of public resources.	ESEA §4204(b)(2)(C)		- Policies and procedures	Met Requirements	

TITLE IV, PART B: FISCAL MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
Indicator 1: Specific Fiscal Requirements						
1.1	If the LEA charges program fees, it is able to document its process it uses to collect fees.	2 CFR §200.80; 21st CCLC RFA, Frequently Asked Questions: Can a Program Charge Fees?	- Financial policies and procedures	- Budget (On file at OSSE) - Policies and Procedures - Communication to families that fees are charged - Interim Reports (On file at OSSE)	Met Requirements	
1.2	The LEA ensures that the budgeted evaluator cost does not exceed eight percent of the total annual 21st CCLC grant award amount.	2 CFR §200.210 and §200.302; 21st CCLC RFA, Reporting Requirements: Annual External Evaluation Report		- On file at OSSE	Met Requirements	
1.3	The LEA requests grant funds at least once quarterly but no more than once monthly.	2 CFR §200.210 and §200.302; 21st CCLC RFA, Frequently Asked Questions: How are Award Payments Distributed?		- On file at OSSE	Met Requirements	
1.4	The LEA carried over at most 15 percent of 21st CCLC grant award funds from the previous year and funds from the previous year did not lapse.	2 CFR §200.210 and §200.302; 21st CCLC RFA, Frequently Asked Questions: How are Award Payments Distributed?		- On file at OSSE	Met Requirements	
1.5	The LEA retains all financial records, supporting documents, statistical records, and all other non-federal entity records pertinent to the 21st CCLC award for a period of three years from the date of submission of the final expenditure report.	2 CFR §200.333	- Financial policies and procedures		Met Requirements	
	The LEA uses 21st CCLC funds to increase the level of State, local, and other non-federal funds that would, in the absence of funds under this part, be made available for programs and activities authorized under this part, and in no case supplant federal, State, local, or non-federal funds.	ESEA §4204(b)(2)(G)		- Policies and procedures - Staff interview	Met Requirements	

SCHOOL IMPROVEMENT GRANT: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
Indicator 1. General Compliance: The subgrantee ensures that the School Improvement Grant (SIG) intervention models are in compliance with the final requirements of the SIG program.						
1. General (Compliance)						
1.1	The subgrantee appropriately recruited, screened, and selected external partners.	SIG Guidance: H-19a. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A.4, Strongest Commitment (a)(4).		If applicable, documentation such as: - Announcement of the Request for Proposals (RFP) - RFP documents - Sample score sheets from vendor review process	Met Requirements	
1.2	The subgrantee modified its practices or policies to implement interventions effectively.	SIG Guidance: H-4(5). Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 4, Strongest Commitment (a)(6).		Documentation such as: - Written policies/procedures demonstrating modified practices; and - Written notices to staff with updates on policies/procedures.	Met Requirements	
1.3	The subgrantee has a plan for sustaining the reforms after the funding period ends.	SIG Guidance: H-4(5), I-2(12). Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 4, Strongest Commitment (a)(12).		Documentation such as: - Projected budget providing for the continuation of SIG programming after the funding period ends	Met Requirements	
1.4	The subgrantee can provide evidence that district-level activities conducted with SIG funds are specifically supporting SIG schools.	2 CFR §200.328	-Source documentation to support expenditure sample requests		N/A	
Indicator 2. Implementation: The subgrantee ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program.						
2.1 Intervention Model Specifics (Indicators for Turnaround Model only)						
2.1.1	Where applicable, the subgrantee replaced the principal and hired back no more than 50% of the school's staff from the previous year or within the past two school years, using specific procedures and processes for screening staff.	SIG Guidance: B-1. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (a)(1).	- List of staff (including hiring dates) who were hired or rehired as part of the turnaround model and those who did not return	Documentation such as: - Interview protocol for staff selection - Any written criteria for screening/hiring new/returning staff	Met Requirements	
2.1.2	The subgrantee used locally adopted competencies to measure the effectiveness of staff who can work within the turnaround environment to meet the needs of students (regarding the selection of new staff).	SIG Guidance: B-1(2), B-3, B-4. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (a)(1)(B).		Documentation such as: - Interview protocol for staff selection	Met Requirements	
2.1.3	The subgrantee implemented strategies such as financial incentives, increased opportunities for promotion and career growth, and more flexible work conditions that were designed to recruit, place, and retain staff with the skills necessary to meet the needs of the students in the turnaround school.	SIG Guidance: B-1(3), B-5. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (a)(1)(C).	Documentation of implementation of strategies such as: - Notices to teachers regarding examples of activities mentioned in Indicator 2.1.2 - Examples of teacher participation in those activities about which teachers were notified - see above		Met Requirements	

SCHOOL IMPROVEMENT GRANT: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
2.1.4	The subgrantee provided staff ongoing, high-quality, job-embedded professional development that is aligned with the school's comprehensive instructional program and designed with school staff to ensure that they are equipped to facilitate effective teaching and learning and have the capacity to successfully implement school reform strategies.	SIG Guidance: B-1(4), B-6. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (a)(1)(D).	Documentation of PD such as: - Sign-in sheets, with dates, title of PD, etc. - PowerPoint presentations used during PD - PD Agendas		Met Requirements	
2.1.5	The subgrantee granted new authority to the principals of the school implementing a turnaround model and adopted a new governance structure, which includes, but is not limited to, requiring the school to report to a new "turnaround office" in the subgrantee, hiring a "turnaround leader" who reports directly to the Superintendent or Chief Academic Officer, or entered into a multi-year contract with the LEA or SEA to obtain added flexibility in exchange for greater accountability.	SIG Guidance: B-1(2) and (5). Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (a)(1)(E).	-Documentation of described governance structure such as: - Organizational chart demonstrating "turnaround office" or "turnaround leader"	- Documentation describing new authority that the principal has with regards to SIG and specifically staffing, calendars, scheduling, and budgeting	Met Requirements	
2.1.6	The subgrantee used/uses data to identify and implement an instructional program that is research-based and vertically aligned from one grade to the next as well as aligned with State academic standards.	SIG Guidance: B-1(6), B-7. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (a)(1)(F).	-Documentation of data use such as: sample of a data report used to inform the implementation of the instructional program		Met Requirements	
2.1.7	The subgrantee promoted/promotes the continuous use of student data (such as formative, interim, and summative assessments) to inform and differentiate instruction in order to meet the academic needs of individual students.	SIG Guidance: B-1(7). Federal Register : Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (a)(1)(G).		-Documentation such as: - Sample of a student data report that was used to differentiate instruction (redacted)	Met Requirements	
2.1.8	The subgrantee established schedules and implemented strategies that provided increased learning time (as defined in the final requirements).	SIG Guidance: A-31, A-31a, A-32, A-32a, A-32b, A-32c, A-32d, B-1(8). Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (a)(1)(H).	-Documentation of increased learning time such as: School calendar/schedule demonstrating increased learning time		Met Requirements	

SCHOOL IMPROVEMENT GRANT: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
2.1.9	The subgrantee provided/provides appropriate social-emotional and community-oriented services and supports for students.	SIG Guidance: B-1(9), B-8. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants, A. 2, Strongest Commitment (a)(1)(I).	-Documentation of community outreach and social-emotional support to students such as: 1. Flyers/notices to parents/students of meetings, events, etc. 2. Sign-in sheets from parent meetings/community events 3. Agendas for parent/community meetings 4. Meeting minutes from parent/community meetings		Met Requirements	
2.2 Intervention Model Specifics (Indicators for Transformation Model only)						
2.2.1	Where applicable, the subgrantee replaced the principal and implemented procedures and processes to recruit, place, and retain staff with the necessary skills to implement the transformation model.	SIG Guidance: E-2. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (d)(1)(i)(A), (d)(1)(i)(E).	- Job announcements for positions with SIG schools		Met Requirements	
2.2.2	The subgrantee developed and increased teacher and school leader effectiveness.	SIG Guidance: E-2, E-5. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (d)(1)(i)(B).	Documentation of PD such as: - Sign in sheets, with dates, title of PD, etc. - PowerPoint presentations used during PD - PD Agendas		Met Requirements	
2.2.3	The subgrantee implemented comprehensive instructional reform strategies.	SIG Guidance: E-7, E-8. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (d)(2).	Documentation of instructional reform strategies such as: - Strategic plan as it relates to instructional reform strategies - Meeting minutes that address the implementation of the reform strategies - Presentations regarding the implementation of reform strategies		Met Requirements	

SCHOOL IMPROVEMENT GRANT: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
2.2.4	The subgrantee increased learning time and created community-oriented schools.	SIG Guidance: A-31, A-31a, A-32, A-32a, A-32b, A-32c, A-32d, E-9, E-10, E-10a, E-11. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (d)(3).	Documentation of community outreach such as: '- Flyers/notices to parents/students of meetings, events, etc. - Sign-in sheets, agendas, meeting minutes from parent meetings/community events - Documentation of increased learning time such as: school calendar/schedule demonstrating increased learning time		Recommendation	The LEA representative provided requested examples of extended learning time at Ballou High School including academic tutoring opportunities and Saturday school and increased learning time such as the May 2018 attendance payroll for the Reach program and an attendance sheet from the athletic tutoring program and teacher timesheets that demonstrate school staff worked additional hours for the tutoring program. However, while the documents shared provide some evidence that increased learning time occurred at Ballou High School, the documentation does not include a school calendar or schedule with the increased learning time built into it and fails to include sign-in sheets or participant rosters of student participation in the increased learning time. Recommendation: It is recommended that the LEA develop a process for collecting, storing and maintaining documents that demonstrate compliance with the requirements of the federal School Improvement Grant program. It is also recommended that Ballou High School include, in its school calendar, the programs and offerings that demonstrate increased learning time for its students.
2.2.5	The subgrantee provided operational flexibility and sustained support.	SIG Guidance: E-13, E-14, E-15. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (d)(1)(i)(E).	Documentation of subgrantee sustained support such as: '- Calendar of meetings between subgrantee and school-site - Meeting notes, agendas, and sign-in sheets from meetings between subgrantee and school-site Documentation of subgrantee providing school specific operational flexibilities such as evidence demonstrating: 1. Allowing the school to be run under a new governance structure 2. Allowing the school to implement a variation of the standard school-based budget 3. Ensuring that the school received ongoing TA from the subgrantee		Met Requirements	
2.2.6	The subgrantee implemented such strategies as financial incentives, increased opportunities for promotion and career growth, and more flexible work conditions that were designed to recruit, place, and retain staff with the skills necessary to meet the needs of the students in the school.	SIG Guidance: E-1, E-2(4). Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (d)(1)(i)(E).	Documentation of implementation of such strategies such as: '- Notices to teachers regarding examples of actions mentioned in indicator 2.2.5 - Examples of teacher participation in those activities about which teachers were notified (see above)		Met Requirements	
2.2.7	The subgrantee uses data to identify and implement an instructional program in a manner that is aligned to SIG requirements.	SIG Guidance: E-1, E-16. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (d)(2)(i).	Documentation of data use such as: '- Sample of a data report used to inform instructional program		Met Requirements	

SCHOOL IMPROVEMENT GRANT: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
2.2.8	The subgrantee promotes the continuous use of student data (such as from formative, interim, and summative assessments) to inform and differentiate instruction in order to meet the educational and developmental needs of individual students.	SIG Guidance: E-1, E-16. Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (a)(1)(i)(B).		Documentation such as: - Sample of student data report that was used to differentiate instruction (redacted)	Met Requirements	
2.2.9	The subgrantee provides staff ongoing, high-quality, job-embedded professional development such as coaching and mentoring that is aligned with the school's comprehensive instructional program and designed with school staff to ensure they are equipped to facilitate effective teaching and learning and have the capacity to implement successfully the school reform strategies.	SIG Guidance: E-7(3). Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 2, Strongest Commitment (d)(1)(i)(D).	Documentation of PD such as: - Sign in sheets, with dates, title of PD, etc. - PowerPoint presentations used during PD - PD Agendas		Met Requirements	

SCHOOL IMPROVEMENT GRANT: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
2.3 Intervention Model Specifics (Indicators for Evidence-Based Whole School Reform only)						
2.3.1	The subgrantee ensured that the chosen intervention model improves student academic achievement or attainment.	SIG Guidance: L-1(1). Federal Register: Section I. SEA Priorities in Awarding School Improvement Grants A. 3, Definitions, Whole-school reform model (a).	Documentation such as: - Reports demonstrating student achievement or attainment before and after the implementation of the chosen intervention model 2. Reports from coordinator of chosen intervention model detailing student academic achievement or attainment		N/A	
2.3.2	The subgrantee ensured that the chosen model would be implemented for all students in a school.	SIG Guidance: L-1(2). Federal Register: Section I. 3. Definitions, SEA Priorities in Awarding School Improvement Grants A. 3, Definitions, Whole-school reform model (b).	Documentation such as: - School schedule demonstrating implementation of program for all students		N/A	
2.3.3	The subgrantee ensured that the intervention model addresses school leadership in a comprehensive and coordinated manner.	SIG Guidance: L-1(3). Federal Register: Section I. 3. Definitions, SEA Priorities in Awarding School Improvement Grants A. 3, Definitions, Whole-school reform model (c)(1).	Documentation of school leadership engagement from the subgrantee such as: - Agendas/minutes for meetings between subgrantee and school leadership - Sign-in sheets for meetings between subgrantee and school leadership - Schedule/calendar of meetings held between subgrantee and school leadership		N/A	
2.3.4	The subgrantee ensured that the intervention model addresses teaching and learning in at least one full academic content area in a comprehensive and coordinated manner.	SIG Guidance: L-1(3). Federal Register: Section I. 3. Definitions, SEA Priorities in Awarding School Improvement Grants A. 3, Definitions, Whole-school reform model (c)(2).	Documentation of PD such as: - Sign-in sheets, with dates, title of PD, etc. - PowerPoint presentations used during PD - PD Agendas		N/A	
2.3.5	The subgrantee ensured that the intervention model addresses student non-academic support in a comprehensive and coordinated manner.	SIG Guidance: L-1(3). Federal Register: Section I. 3. Definitions, SEA Priorities in Awarding School Improvement Grants A. 3, Definitions, Whole-school reform model (c)(3).	Documentation of PD such as: - Sign-in sheets, with dates, title of PD, etc. - PowerPoint presentations used during PD - PD Agendas		N/A	
2.3.6	The subgrantee ensured that the intervention model addresses family and community engagement in a comprehensive and coordinated manner.	SIG Guidance: L-1(3). Federal Register: Section I. 3. Definitions, SEA Priorities in Awarding School Improvement Grants A. 3, Definitions, Whole-school reform model (c)(4).	Documentation of family and community outreach such as: - Flyers/notices to families/students, community members of meetings, events, etc. - Sign-in sheets from family meetings/community events - Agendas for family/community meetings - Meeting minutes from family/community meetings		N/A	

SCHOOL IMPROVEMENT GRANT: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
2.3.7	The subgrantee implemented the chosen model in partnership with a model developer.	SIG Guidance: L-4, Federal Register: Section I. 3. Definitions, SEA Priorities in Awarding School Improvement Grants A. 3, Definitions, Whole-school reform model developer (a), (b).	-Documentation of contractual partnership with model developer such as: contract with model developer detailing the roles and responsibilities of each party		N/A	
Indicator 3. Technical Assistance: The subgrantee ensures that technical assistance is provided to its subgrantee consistent with the final requirements of the SIG program.						
3.1	If applicable, the subgrantee is providing support to schools regarding SIG implementation.	SIG Guidance: H-4(10), E-13(2). Federal Register: Section II. Awarding School Improvement Grants to LEAs A. LEA Requirements, 2(c).	Documentation of subgrantee/school engagement such as: - Agendas/minutes for meetings between subgrantee and school staff - Sign-in sheets for meetings between subgrantee and school staff - Schedule/calendar of meetings held between subgrantee and school staff		Met Requirements	
Indicator 4. Monitoring: The subgrantee ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program.						
4.1	The subgrantee has ensured that each SIG school is fully implementing the selected intervention model.	SIG Guidance: H-24, H-25. Federal Register: Section II. Awarding School Improvement Grants to LEAs A. LEA Requirements, 8(a).	Documentation of subgrantee monitoring of schools such as: - Walk-through reports - Observation reports - Agendas/minutes/sign-in sheets for meetings between subgrantee/school staff		Met Requirements	
Indicator 5. Data Collection: The SEA ensures that data is being collected consistent with the final requirements of the SIG program (If applicable)						
5.1	The subgrantee has a data collection and management process.	SIG Guidance: E-7(1), E-7(2), J-16. Federal Register: Section II. Awarding School Improvement Grants to LEAs A. LEA Requirements, 8(a).	-Documentation of data collection and management process such as: sample of a data report used to measure progress toward the goal(s) for a leading indicator(s)		Met Requirements	
5.2	The subgrantee is collecting benchmark, formative or interim data on leading indicators.	SIG Guidance: B-1(7), E-7(2), H-24, H-27. Federal Register: Section II. Awarding School Improvement Grants to LEAs A. LEA Requirements, 8(a).		-Documentation such as: sample of a data report that includes benchmark, formative, and interim data on a leading indicator(s)	Met Requirements	

SCHOOL IMPROVEMENT GRANT: FISCAL MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
1.1-F-SIG	If applicable to the subgrantee and if requested, the entity can provide evidence showing previous audit findings have been addressed.	2 CFR §200.501	-On file at OSSE		N/A	
1.2-F-SIG	The subgrantee is ensuring that a school being served with SIG funds is still receiving all the funds it would have received without the SIG award.	ESEA §§ 1113; 1120A(c)	- Comparability reports - Documentation of Title I ranking and allocation.	N/A	Met Requirements	
1.3-F-SIG	The subgrantee can demonstrate that funds for the current grant period were obligated within the period of availability.	34 CFR §§76.707-76.710 and 2 CFR §§200.77, 200.309		- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts.	Met Requirements	
1.4-F-SIG	The subgrantee can demonstrate that grant expenditures were necessary, reasonable, allocable, and only for authorized purposes to SIG eligible schools.	ESEA §1003(g); 2 CFR §§200.403 - 200.405		- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts.	Met Requirements	

PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence	Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.	
Indicator 1: (Priority Schools only) Priority schools implemented their chosen strategies					
1.1	The subgrantee ensured that the Priority school effectively implemented its chosen strategy as described in its approved application.	Title I - Improving the Academic Achievement of the Disadvantaged SEC.1003. SCHOOL IMPROVEMENT (c) PRIORITY - The State educational agency, in allocating funds to local educational agencies under this section, shall give priority to local educational agencies that -- (1) serve the lowest-achieving schools; (2) demonstrate the greatest need for such funds; and (3) demonstrate the strongest commitment to ensuring that such funds are used to enable the lowest-achieving schools to meet the progress goals in school improvement plans under section 1116(b)(3)(A)(v).	Provide evidence of the Priority schools implementation of the following strategies: School Leadership; Curriculum, Assessment & Intervention; Effective Staffing Practices; Effective Use of Data; School Culture & Climate; and Family Engagement. The evidence submitted should include the implementation of the following: - On-site trainings for School Leadership - Opportunity Academies at WashMet and Luke Moore - Secondary School Program at Coolidge - Program Design and Consultation for Effective Staffing Practices - Pathway to Excellence Tool for Use of Data - Reign Initiative - Turnaround for Children partnership Also include how the following divisions/ offices at DCPS supported the implementation work at the Priority schools: - The College and Career - School Design and Continuous Improvement (SDCI) - Office of Strategic School Planning and Enrollment - Office of Innovation and School Design (ISD) - Student Empowerment & Equity Programs (SEEP) Team - Office of Policy and Strategy		Met Requirements
1.2	The subgrantee tracked the Priority school's progress of implementing each chosen strategy.	See above	Provide evidence of how the LEA tracked the progress of the above mentioned strategies at the Priority schools.		Met Requirements
1.3	The subgrantee used data to track the Priority school's progress in implementing the strategy.	See above	Provide evidence of how the LEA used data to track the progress in implementing the above mentioned strategies at the Priority schools.		Met Requirements
1.4	The Priority school created a school improvement plan which addresses the reason its in this classification.	See above	On file with OSSE		Met Requirements

PROGRAM MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence	Evidence	Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
Indicator 2: (Focus Schools only) Focus schools implemented their chosen strategies						
2.1	The subgrantee ensured that the Focus school effectively implemented its chosen strategy as described in its approved application.	See above	<p>Provide evidence of the Focus schools implementation of the following strategies: Curriculum, Assessment & Intervention; Effective Staffing Practices; Effective Use of Data; School Culture & Climate; and Family Engagement.</p> <p>The evidence submitted should include the implementation of the following:</p> <ul style="list-style-type: none"> - College and Career Preparedness - Program Design and Consultation for Effective Staffing Practices - PD for staff supporting subgroups such as English Learners and Students with Disabilities - Pathway to Excellence Tool for Use of Data - Reign Initiative - Turnaround for Children partnership at Garrison <p>Also include how the following divisions/ offices at DCPS supported the implementation work at the Focus schools:</p> <ul style="list-style-type: none"> - College and Career - School Design and Continuous Improvement (SDCI) - Office of Innovation and School Design (ISD) - Student Empowerment & Equity Programs (SEEP) Team - Office of Policy and Strategy 		Met Requirements	
2.2	The subgrantee tracked the Focus school's progress of implementing each chosen strategy.	See above	Provide evidence of how the LEA tracked the progress of the above mentioned strategies at the Focus schools.		Met Requirements	
2.3	The subgrantee used data to track the Focus school's progress in implementing the strategy.	See above	Provide evidence of how the LEA used data to track the progress in implementing the above mentioned strategies at the Focus schools.		Met Requirements	
2.4	The Focus school created a school improvement plan which addresses the reason its in this classification.	See above	On file with OSSE		Met Requirements	

TITLE I, PART A(1003): FISCAL MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
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Indicator 1: (Priority Schools Only) Specific Fiscal Requirements						
1.1-F-1003	The subgrantee can demonstrate that its written methodology ensures that each school the local educational agency proposes to serve will receive all of the State and local funds it would have received in the absence of funds received under this section.	ESEA §1003(e)(1)(F)(2)	- Written methodology procedures demonstrating how state and local resources were allocated to all schools within the LEA - Provide documentation demonstrating actual school-level allocation of 1003 funding to Priority schools. OSSE will provide the LEA with a list of sample schools.		Indeterminate	This indicator is currently under review by OSSE.
Indicator 2: (Focus Schools only) Specific Fiscal Requirements						
2.1-F-1003	The subgrantee can demonstrate that its written methodology ensures that each school the local educational agency proposes to serve will receive all of the State and local funds it would have received in the absence of funds received under this section.	ESEA §1003(e)(1)(F)(2)	- Written methodology procedures demonstrating how state and local resources were allocated to all schools within the LEA - Provide documentation demonstrating actual school-level allocation of 1003 funding to Focus schools. OSSE will provide the LEA with a list of sample schools.		Indeterminate	This indicator is currently under review by OSSE.

MCKINNEY VENTO: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).			Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.	On-Site Documents: These documents must be made available to OSSE during the monitoring visit.		
Indicator 1: The subgrantee is compliant with ESEA Title I Homeless program requirements						
1.1	An subgrantee receiving Title I, Part A funds must include in its local plan a description of how the plan is coordinated with the McKinney-Vento Act. The local plan must describe services provided to homeless children and youths.	42 USC §11432(g)(4)(B); ESEA §1113(c)(3)(A)(i)	- On file with OSSE	- Evidence that the subgrantee implemented the plan as stated in EGMS (e.g., budget reports at the end of a fiscal year, records of expenditures, carryover, summary reports, and evidence of activities).	N/A	
Indicator 2: The subgrantee has implemented the McKinney-Vento requirements						
2.1	There is evidence that the subgrantee reviews and revises, as needed, policies, procedures, and/or practices that may act as barriers to the identification, enrollment, retention, and success of homeless students.	42 USC §11432(g)(1)(I) and (g)(7)(A)	The subgrantee must provide evidence of compliance, which may include the following: - Agendas, sign-in sheets, handouts, and/or minutes - If applicable, copy of the final version of new policies after revisions have been incorporated - If applicable, evidence that the subgrantee adopted and disseminated the revised policy, procedure or practice. Examples of demonstrated evidence may include providing a copy of the subgrantee's handbook or other methods used to distribute policies/procedures to stakeholders - Schedule/timeline indicating the subgrantee's intention to regularly review/revise policies/procedures as needed of when policies were reviewed.		Met Requirements	
2.2	The subgrantee has a designated homeless liaison.	42 USC §11432(g)(1)(J)(ii)	The subgrantee must provide evidence of compliance, which may include the following: - Organizational Chart - Homeless Liaison job description - Homeless educational rights literature identifying the Homeless Liaison's contact information - Evidence that the subgrantee designates and allows for training of a liaison for homeless children and youth and that this person provides training to other relevant district personnel - Evidence that the homeless liaison provides training to school-based staff		N/A	
2.3	The subgrantee has a procedure in place and implements that procedure to identify homeless students.	42 USC §11432(g)(6)(A)(i)	The subgrantee must provide evidence of compliance, which may include a process for identifying homeless students (e.g., student roster, documentation of student enrollment procedures or registration/enrollment forms that show self-identification indicator).		Met Requirements	
2.4	The subgrantee shall cooperate with the State Coordinator for Education of Homeless Children and Youths and comply with any requests for information.	42 USC §§11432(g)(6)(C)	- On file at OSSE		N/A	

MCKINNEY VENTO: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
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2.5	<p>There is evidence that:</p> <p>a. The subgrantee has a procedure for communicating information regarding enrollment in public schools for homeless families.</p> <p>b. Schools are knowledgeable of the policies and procedures.</p>	<p>42 USC §§11432(g)(3)(B)-(g)(3)(C)</p>	<p>The subgrantee must provide evidence of compliance, which may include the following:</p> <ul style="list-style-type: none"> - Parent involvement/outreach policy and planning documents (e.g., handbook or materials distributed to families that includes subgrantee's policies or procedures for communicating to homeless families) - Parent meeting/activity calendar, agenda, and sign-in/attendance sheets - Evidence of parent/community outreach (e.g., PowerPoint deck, flyer, and other handouts) - PD schedule that includes MKV training for staff (e.g., materials distributed during the training session, agenda, sign-in sheet) 		<p>N/A</p>	
2.6	<p>There is evidence that the subgrantee has adopted a written dispute resolution process which provides for the prompt resolution of disputes and procedures to ensure that students are enrolled in the school in which placement is sought and provided transportation during the dispute resolution process.</p>	<p>42 USC §11432(g)(3)(E); 42 USC §11432(g)(4)(A); 42 USC §11432(e)(3)(C)(ii)(II); 42 USC §11432(2); 42 USC §11432(g)(1)(I)</p>	<p>The subgrantee must provide evidence of compliance, which may include the following:</p> <ul style="list-style-type: none"> - subgrantee's Dispute Resolution Policy (either created by subgrantee or adopting the OSSE policy); - Evidence that the subgrantee implements a process for the prompt resolution of disputes, such as a phone log, notes, or e-mail messages - Records indicating that enrollment disputes are investigated and resolved in a timely manner - Evidence that students are enrolled and provided transportation during the dispute resolution process - Must include guidance and template of the forms that may be used to request an appeal. - Examples of written notification to parents and youth regarding placement decisions when they are different from what was requested, if applicable. Written procedure or narrative description of the subgrantee's procedure/process to ensure that the Homeless Liaison is involved in the process when making enrollment, school selection/placement, and eligibility decisions and communicating with families/youths, etc. 		<p>Met Requirements</p>	
2.7	<p>If a dispute arises over school selection or enrollment in a school, the subgrantee provides the parent or the guardian of a child or youth, a written explanation of the school's decision regarding school selection or enrollment, including the rights of the parent, guardian, or youth to appeal the decision.</p>	<p>42 USC §11432(g)(3)(E)(ii)</p>	<p>The subgrantee must provide evidence of compliance, which may include the following (if applicable):</p> <ul style="list-style-type: none"> - Sample of letter of explanation to communicate enrollment decisions (e.g., a form letter or redacted letter previously submitted) - The subgrantee's documentation to communicate to families about their Right to Appeal enrollment decisions (e.g., form letter, handout, flyer, handbook excerpt, etc.) - Written parent notifications (samples) of the determination 		<p>Met Requirements</p>	

MCKINNEY VENTO: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
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2.8	The subgrantee has adopted policies and practices to ensure that homeless students are not stigmatized or separated from the mainstream school environment.	42 USC §11432(g)(1)(J)(i)	The subgrantee must provide evidence of compliance, which may include the following: - A copy of the final version of policies/procedures - A list of programs offered to the general population and assessment tool(s) used to determine individual student's needs		N/A	
2.9	Procedures are in place to ensure students have access to services comparable to services provided to other students in the school; such as ESEA programs and programs for children with disabilities for which the homeless youth meets the eligibility criteria, programs in vocational and technical education, programs for gifted and talented students, and school nutrition programs.	42 USC §11432(g)(4)	The subgrantee must provide evidence of compliance, which may include the following (if applicable): - List of services and resources offered for homeless students. - Needs assessment to determine appropriate services for eligible students (e.g. process and assessment tools used to gather information) - Documentation of services provided to homeless students		N/A	
2.10	There is evidence that the subgrantee ensures homeless pre-school age children have equal access to the same public preschool programs for which the children are eligible (i.e., Head Start, Title I Preschool, Pre-K) as provided for non-homeless children.	42 USC §11432(g)(6)(A)(iii)	The subgrantee must provide evidence of compliance, which may include the following (if applicable): - Brochures/flyers shared with parents regarding the MySchoolDC/Lottery process. - General review of all policies/procedures may act as barriers - Documents related to activities associated with homeless pre-school youth		N/A	
2.11	The subgrantee coordinates with local social service agencies and other agencies or programs providing services to homeless children and their families (i.e., clothes, food, medical, dental, shelter).	42 USC §11432(g)(5)(A)(i)	The subgrantee must provide evidence of compliance, which may include evidence that the subgrantee coordinates with local social service agencies and other agencies or programs providing services to homeless children and their families (i.e., clothes, food, medical, dental, shelter), for example schedules, agenda, minutes, notes, or handouts from attending related meetings, list of collaborative efforts with local agencies to provide events for homeless students at the subgrantee, and/or sample referral forms (if applicable).		N/A	
2.12	The subgrantee has a procedure for assisting homeless, unaccompanied youth in placement and enrollment decision.	42 USC §11432(g)(3)(B)(iv)	The subgrantee must provide evidence of compliance, which may include evidence that unaccompanied youth are enrolled, provided transportation, and afforded all rights and protections as outlined in the McKinney-Vento Homeless Assistance law as applicable.		N/A	

MCKINNEY VENTO: PROGRAM MANAGEMENT AND ADMINISTRATION						
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2.13	The subgrantee ensures that transportation to the school of origin is provided upon request and in accordance with legal requirements	42 USC §§11432(g)(1)(J)(iii); 42 USC §11432(2); 42 USC §11432(g)(1)(I)	The subgrantee must provide evidence of compliance, which may include evidence that the subgrantee ensures that transportation is provided upon request and monitored by the subgrantee including on site emergency resources, for example, transportation support documentation (ex: Excel spreadsheet tracking supports), procedure to determine need for transportation to/from the school is provided, and/or tracking/log of support distribution.		Met Requirements	
2.14	The subgrantee has procedures for coordinating with other subgrantees and inter-district educational agencies regarding the transfer of school records.	42 USC §11432(g)(5)(A)(ii)	The subgrantee must provide evidence of compliance, which may include evidence of a procedures for coordinating with other subgrantees and inter-district agencies to obtain or transfer school records, for example documentation showing record transfer, MOA, MOU, training documents, and/or written policy or narrative.		N/A	
2.15	To ensure that homeless students are properly identified and provided services, the subgrantee provides specific in-service training and staff development for school personnel in meeting the needs of homeless students.	42 USC §11432(g)(6)(A)(ix)	The subgrantee must provide evidence of compliance, which may include evidence that the subgrantee provides specific in-service training and staff development for school personnel in meeting the needs of homeless students. For example, training or technical assistance materials, presentation materials, materials distributed within the subgrantee to heighten awareness of the needs of homeless students (e.g. materials used to share information about homelessness, literature or website links shared with subgrantee and school staff, OSSE training and resources materials that were shared) as applicable.		Met Requirements	
2.16	The subrecipient's program is based on an assessment of the educational and related needs of homeless children and youths in the area served by the subrecipient (which may be undertaken as part of needs assessments for other disadvantaged groups). (GRANT SUBRECIPIENTS ONLY)	42 USC §11433(b)(1)	- On file at OSSE		N/A	
2.17	The subrecipient evaluates the program/project in accordance with the subrecipient's approved application, as applicable. (GRANT SUBRECIPIENTS ONLY)	ESEA §723(c)(3)(E)	The subgrantee must provide evidence of compliance, which may include evidence that the approved evaluation plan was implemented in alignment with the approved application on file at OSSE.		N/A	
2.18	There is evidence that services provided under the subrecipient's McKinney-Vento program expands or improves, but does not replace, services provided as part of a school's regular academic program. (GRANT SUBRECIPIENTS ONLY)	42 USC §11433(a)(2)(A)(iii)	The subgrantee must provide evidence of compliance, which may include evidence that the approved plan was implemented in alignment with the approved application on file at OSSE.		N/A	

MCKINNEY VENTO: PROGRAM MANAGEMENT AND ADMINISTRATION						
Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
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2.19	There is evidence that the subrecipient is implementing the McKinney-Vento program as described in the approved application. (GRANT SUBRECIPIENTS ONLY)	42 USC §11433(b)	The subgrantee must provide evidence of compliance, which may include evidence that the subgrantee's McKinney-Vento program was implemented as described in the subgrantee's approved application on file at OSSE.		N/A	

MCKINNEY VENTO: FISCAL MANAGEMENT AND ADMINISTRATION

Indicator	Guiding Statement	Citation	Evidence		Determination	Remarks
<p>Within this title, all references to ESEA shall mean the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (2015).</p>			<p>Pre-Site Documents: These documents must be submitted to OSSE in advance of the monitoring visit.</p>	<p>On-Site Documents: These documents must be made available to OSSE during the monitoring visit.</p>		
<p>Indicator 1: McKinney-Vento Program- Specific Fiscal Requirements</p>						
<p>1.1-F-MKV</p>	<p>If applicable to the subgrantee and if requested, the entity can provide evidence showing previous audit findings and/or monitoring findings have been addressed.</p>	<p>2 CFR §200.501</p>	<p>- On file at OSSE</p>	<p>NA</p>	<p>N/A</p>	
<p>1.2-F-MKV</p>	<p>The subgrantee can demonstrate that funds for the current grant period were obligated within the period of availability.</p>	<p>34 CFR §§76.707-76.710, 2 CFR §§200.77, 200.309</p>		<p>- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts.</p>	<p>Met Requirements</p>	
<p>1.3-F-MKV</p>	<p>The subgrantee can demonstrate that MKV grant expenditures were necessary, reasonable, allocable, and only for authorized purposes.</p>	<p>2 CFR §§200.403 - 200.405</p>		<p>- Subgrantee source documentation to support OSSE's expenditure sample request such as invoices, receipts, contracts.</p>	<p>Met Requirements</p>	
<p>1.4-F-MKV</p>	<p>The subgrantee complies with the maintenance of effort (MOE) fiscal requirement. (If Title I, Part A is monitored with MKV, reference Item 1.1-F-TitleI to determine compliance.)</p>	<p>ESEA §1118 and 8521</p>	<p>- On file at OSSE</p>		<p>N/A</p>	

LEAs are required to use the following format when developing their proposed plan to address identified findings of noncompliance. The LEA is expected to submit its proposed plan within thirty days of receipt of this report. OSSE will respond to the plan within 30 days after receipt. OSSE's response will be captured in the column titled, "SEA Response to CAP". If all proposed activities are approved, OSSE will indicate this in its response and the LEA should begin implementation and will establish the frequency for CAP reporting. If OSSE is unable to approve the CAP as written, OSSE will provide feedback and offer to set up a technical assistance session.

CORRECTIVE ACTION PLAN TEMPLATE

FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p><u>Fiscal (General) 2.1</u></p> <p><u>Finding:</u> T The LEA failed to provide Time and Effort documentation totaling \$6,429,495.20 (Schoolwide - \$5,719,138.61 for 26 staff persons, Title III - \$73,922.36 for four staff persons, and 21st Century - \$636,434.23) for the grants identified on OSSE's expenditure sample from the 2017 - 18 school year.</p> <p><u>Action Required:</u> Within 30 days, the LEA must submit to OSSE the following:</p> <ul style="list-style-type: none"> - Recreated semi-annual certifications or personnel activity reports for employees whose wages and salaries were reimbursed from the Schoolwide, Title III and 21st CCLC grants and were identified on OSSE's expenditure sample from the 2017-2018 school year, provided that the LEA can confirm that the recreated semi-annual certifications or personnel activity reports accurately reflect the total work performed; and - Additional evidence to support the recreated time and effort documentation and demonstrate that the reimbursements paid by OSSE to the LEA were accurate, allowable, and properly allocated (i.e. position descriptions, organizational charts, schedules, and any other documents contemporaneously prepared with the employee's actual grant activities which support the distribution of the employee's salary or wages to specific activities or cost objectives). 					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p><u>Fiscal (General) 2.1</u></p> <p><u>Action Required (CONT'D);</u></p> <p>Within 30 days, the LEA must also submit a corrective action plan stating how the LEA will ensure that Time and Effort documentation is collected regularly for employees who are paid from federal funds and that the LEA follows its own Time and Effort policy and procedures. Such plan must include the following;</p> <ul style="list-style-type: none"> - A list of trainings for employees, with anticipated dates, on Time and Effort reporting requirements within the LEA (trainings must be completed by August 30, 2019); and - the staff persons that will be required to participate in the above training; - the tool or mechanism that the LEA will use to ensure that staff implement its Time and Effort policies; and - a timeline detailing the sequence of check-ins the LEA will conduct, following the training, to ensure that its Time and Effort policies are being followed. <p>No later than September 30, 2019, the LEA must submit to OSSE copies of the following:</p> <ul style="list-style-type: none"> - the training materials used to train staff; and - agendas and sign-in sheets from each training offered. <p>OSSE reserves the right to take further action based on the documents provided by the LEA.</p>					
<p><u>IDEA (Program) 6</u></p> <p><u>Indicator:</u> The subgrantee timely implements corrective actions contained in the State complaint decision letter.</p> <p><u>Action Required:</u> LEA must develop and implement a plan that addresses timely compliance and dispute resolution activities.</p>					
<p><u>IDEA (Program) 9</u></p> <p><u>Indicator:</u> Upon initial referral, or parent request for evaluation, parents were provided procedural safeguards.</p> <p><u>Action Required:</u> Provide a copy of procedural safeguards to parents.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p>IDEA (Program) 12</p> <p>Indicator: The signature for parent consent was obtained prior to the date of reevaluation.</p> <p>Action Required: Not correctable at the student level.</p>					
<p>IDEA (Program) 14</p> <p>Indicator: Parent/student was invited to the most recent IEP meeting.</p> <p>Action Required: Provide evidence that the parent/student attended the meeting or refused to attend the meeting.</p> <p>If parent/student was not invited, reconvene IEP meeting with invitation to parent/student.</p>					
<p>IDEA (Program) 15</p> <p>Indicator: Parent/student was notified of IEP meeting early enough to ensure they will have an opportunity to attend.</p> <p>Action Required: Not correctable at the student level.</p>					
<p>IDEA (Program) 17</p> <p>Indicator: General education teacher, unless excused, attended the IEP meeting.</p> <p>Action Required: Not correctable at the student level.</p>					
<p>IDEA (Program) 18</p> <p>Indicator: Special education teacher, unless excused, attended the IEP meeting.</p> <p>Action Required: Not correctable at the student level.</p>					
<p>IDEA (Program) 19</p> <p>Indicator: The subgrantee designee, unless excused, attended the IEP meeting.</p> <p>Action Required: Not correctable at the student level.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p>IDEA (Program) 20</p> <p>Indicator: An individual who can interpret evaluation results, who may be a member of the team described in indicators 17-19, attended the IEP meeting, unless excused.</p> <p>Action Required: Not correctable at the student level</p>					
<p>IDEA (Program) 21</p> <p>Indicator: The IEP includes a Present Level of Academic Achievement and Functional Performance (PLAAFP) that states how disability affects involvement in general curriculum (ages 6-21) or how the disability affects student's involvement in appropriate activities (ages 3-5).</p> <p>Action Required: Convene an IEP meeting or amend the student's IEP so that it includes a PLAAFP that demonstrates how disabilities affects involvement and progress in general curriculum.</p>					
<p>IDEA (Program) 31</p> <p>Indicator: If the IEP team determines that the child must take an alternate assessment, the IEP for this student contains a statement of why the student cannot participate in the regular assessment.</p> <p>Action Required: Convene an IEP Team meeting or amend the student's IEP to include a statement of why the student cannot participate in the regular assessment.</p>					
<p>IDEA (Program) 33</p> <p>Indicator: The IEP includes a statement that the student has been informed of his/her rights that will transfer to the student on reaching the age of majority.</p> <p>Action Required: Obtain and file documentation of notification to student.</p>					
<p>IDEA (Program) 34</p> <p>Indicator: An IEP was developed within 30 days of a determination that the student needs special education and related services.</p> <p>Action Required: Not correctable at the student level.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p>IDEA (Program) 35</p> <p>Indicator: As soon as possible following development of the IEP, related services were made available to the student in accordance with his/her IEP.</p> <p>Action Required: Develop a plan that addresses missed related services or specialized instruction hours.</p>					
<p>IDEA (Program) 36</p> <p>Indicator: Related services were delivered to the student in accordance with his/her IEP in the period specified in the review.</p> <p>Action Required: Develop a plan that addresses missed related services or specialized instruction hours.</p>					
<p>IDEA (Program) 38</p> <p>Indicator: In selecting the LRE, there was consideration of any harmful effects on the student or on the quality of services needed.</p> <p>Action Required: Reconvene IEP team or amend IEP to include documentation in the justification section of the IEP that harmful effects were considered by the IEP team.</p>					
<p>IDEA (Program Correctional) 3</p> <p>Indicator: Youth attend the school at the facility (YSC, IYP or DYRS) at the earliest possible time or receive comparable services while awaiting enrollment in the school, unless documentation is available showing why neither option was possible (e.g., student was at court or hearing on specific date).</p> <p>Action Required: The LEA must provide make up services for all missed services.</p>					
<p>IDEA (Program Correctional) 4</p> <p>Indicator: The subgrantee ensures that student IEPs are accessible to all who are responsible for their implementation (e.g., regular education teachers, special education teachers, and related service providers).</p> <p>Action Required: The LEA must develop a plan, policy or practice to ensure that all individuals responsible for the implementation of IEPs have access to the students' IEPs.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p>IDEA (Program Correctional) 7</p> <p>Indicator: Special education staff at the school are certified or credentialed by OSSE for the services they provide, in accordance with District of Columbia Regulations.</p> <p>Action Required: The LEA must ensure all special education staff hold the required certification.</p>					
<p>IDEA (Program Correctional) 15</p> <p>Indicator: The signature for parent consent was obtained prior to the date of reevaluation.</p> <p>Action Required: Not correctable at the student level.</p>					
<p>IDEA (Program Correctional) 18</p> <p>Indicator: Parent/student was notified of IEP meeting early enough to ensure they will have an opportunity to attend.</p> <p>Action Required: Not correctable at the student level.</p>					
<p>IDEA (Program Correctional) 20</p> <p>Indicator: General education teacher, unless excused, attended the IEP meeting.</p> <p>Action Required: Not correctable at the student level.</p>					
<p>IDEA (Program Correctional) 21</p> <p>Indicator: General education teacher, unless excused, attended the IEP meeting.</p> <p>Action Required: <u>Not correctable at the student level.</u></p>					
<p>IDEA (Program Correctional) 22</p> <p>Indicator: The subgrantee designee, unless excused, attended the IEP meeting.</p> <p>Action Required: Not correctable at the student level.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p>IDEA (Program Correctional) 23</p> <p>Indicator: An individual who can interpret evaluation results, who may be a member of the team described in indicators 19-22, attended the IEP meeting, unless excused.</p> <p>Action Required: Not correctable at the student level.</p>					
<p>IDEA (Program Correctional) 24</p> <p>Indicator: IEP includes a Present Level of Academic Achievement and Functional Performance (PLAAFP) that states how disability affects involvement in general curriculum (ages 6-21) or how the disability affects student's involvement in appropriate activities (ages 3-5).</p> <p>Action Required: Convene an IEP meeting or amend the student's IEP so that it includes a PLAAFP that demonstrates how disability affects involvement and progress in general curriculum.</p>					
<p>IDEA (Program Correctional) 28</p> <p>Indicator: File contains evidence that ESY was determined on an individual basis.</p> <p>Action Required: Provide evidence that ESY was determined on an individual basis.</p>					
<p>IDEA (Program Correctional) 31</p> <p>Indicator: The IEP contains a statement of when the parent(s) will be regularly informed of progress toward the goals.</p> <p>Action Required: Convene an IEP meeting or amend the student's IEP so it includes a statement of when the parent(s) will be regularly informed of progress.</p>					
<p>IDEA (Program Correctional) 38</p> <p>Indicator: Related services were delivered to the student in accordance with his/her IEP in the period specified in the review.</p> <p>Action Required: Develop a plan that addresses missed related services or specialized instruction hours.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p>IDEA (Program Correctional) 39</p> <p>Indicator: The student's IEP is reviewed periodically, but not less than annually to determine whether the annual goals for the student are being achieved.</p> <p>Action Required: Convene the IEP Team to review and renew the student's IEP.</p>					
<p>IDEA (Program Correctional) 41</p> <p>Indicator: Supplemental aids and services were used before removing the student from the regular education environment.</p> <p>Action Required: Reconvene IEP team or amend IEP to include documentation that education in the regular education environment cannot be achieved satisfactorily with the use of supplementary aids and services.</p>					
<p>Title I (Program) 2.1</p> <p>Finding: The LEA provided an LEA-level Parents Right to Know Guide, Back to School Night Title I Annual Meeting sign-in sheets from one sampled school, Title I meeting presentation slides from one sampled school, Principal Guidance on Title I provided by the LEA to all school leaders, a copy of the Title I letter sent to parents at one sampled school, Title I grant agreements between three sampled schools and the LEA's central office, a Local School Advisory Team (LSAT) agenda for a budget meeting and attendance for one sampled school to indicate parent participation in the development of the Title I spending plan for that school.</p> <p>However, for the 2017-18 school year, the LEA failed to provide samples of a school-level parent and family engagement policy for each grade span and evidence of meaningful consultation with parents regarding development of the LEA-level policy or the sampled school-level policies. The LEA also failed to provide evidence that the LEA-wide Parents Right to Know Guide and the sampled school-level Title I letter sent to parents were provided in the most commonly used languages other than English. Lastly, the LEA failed to provide evidence of school-parent compacts for any sampled school. These compacts were stated in the LEA Parents Right to Know Guide to be a component of the school-level parent and family engagement policies required for all schools.</p> <p>Action Required: Within 30 days, the LEA must submit a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - A description of how parents will contribute to the LEA-level and school-level parent and family engagement policies; - A description of how the LEA will distribute information on the parental and family engagement policies to parents; and - A description of how the LEA will provide parents with the Parents Right to Know Guide and the school-level Title I letters in the most commonly used languages other than English. <p>By October 31, 2019, the LEA must submit a copy of its LEA-level and school-level parent and family engagement policies.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p><u>Title I (Program) 2.1(a)</u></p> <p>Finding: The LEA failed to provide any evidence that either the LEA-level or school-level parent and family engagement policies were reviewed to determine their effectiveness for the 2017-18 school year.</p> <p>Action Required: Within 30 days, the LEA must submit a plan for the 2019-20 school year that indicates how the LEA will evaluate and revise the LEA-level parent and family engagement policies.</p>					
<p><u>Title I (Program) 2.1(b)</u></p> <p>Finding: The LEA provided an LEA-level Parents Right to Know Guide, Back to School Night Title I Annual Meeting sign-in sheets from one sampled school, Title I meeting presentation slides from one sampled school, Principal Guidance on Title I provided by the LEA to all school leaders, a copy of the Title I letter sent to parents at one sampled school, Title I grant agreements between three sampled schools and the LEA's central office, and a Local School Advisory Team (LSAT) agenda for budget meeting and attendance for one sampled school to indicate parent participation in the development of the Title I spending plan for that school.</p> <p>The LEA failed to provide evidence that schools have carried out the six requirements to build parent capacity for involvement for the 2017-18 school year.</p> <p>Action Required: Within 30 days, the LEA must submit a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - A description of how the LEA will provide assistance to parents on challenging State academic standards; - A description of the materials in which the LEA will provide to parents to help improve their child's achievement; - A description of how the LEA will communicate with parents to implement and coordinate parent programs, in addition to how the LEA will improve ties between parents and the school; - A description of how parent and family engagement programs and activities will coordinate with other Federal, State, and local programs; - A description of how the LEA will ensure that parent and family engagement activities, presentation materials, and handouts are made available in a language that parents can understand; and - A description of how the LEA will determine other reasonable support for family engagement activities. 					
<p><u>Title I (Program) 2.1(c)</u></p> <p>Finding: The LEA failed to provide evidence of parent and family engagement events for the 2017-18 school year.</p> <p>Action Required: Within 30 days, the LEA must submit a plan for the 2019-20 school year that indicates how the LEA will offer various meeting times for parent and family engagement activities and the Title I annual meetings. The plan may also indicate how the LEA will provide information on transportation, child care, or home visits to encourage participation.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p><u>Title I (Program) 2.5</u></p> <p>Finding: The LEA failed to submit evidence of needs assessments and schoolwide plans for the sample of schools (one elementary, one middle, and one high school) for the 2017-18 school year.</p> <p>Action Required: Within 30 days, the LEA must submit a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - A description of the process to develop schoolwide plans; - A description of how the plans will be developed with the involvement of parents, other members of the community to be served, and individuals who will carry out the plan, such as: teachers, principals, school leaders, etc.; and - A description of how the LEA will make schoolwide plans available to parents, and public in a language that parents can understand. 					
<p><u>Title I (Program) 2.10(a)</u></p> <p>Finding: The LEA failed to provide written affirmations that consultation meetings occurred with each private school and that such meetings covered all elements required by the law. The LEA did provide:</p> <ul style="list-style-type: none"> - City-Wide Consultation Agendas from three meetings (5/19/17, 10/26/17, 1/18/18) - Sign-in sheet from the 10/26/17 meeting - A handout from the 10/26/17 meeting - A follow-up email from the 1/18/18 meeting (dated 1/23/18) - A follow-up email from the 10/26/17 meeting (dated 11/2/18) <p>The LEA also provided the following from the 31 participating private schools:</p> <ul style="list-style-type: none"> - Signed Affirmations of Consultation (AOCs), or the equivalent, from 13 schools that indicated all elements of consultation required by the law had been discussed by the private school official, or another official designated to represent the school. <p>Following the release of the Preliminary Monitoring Report, the LEA provided additional evidence, that was received on May 22, 2019, including several AOCs and duplicate AOCs from the same school. When comparing the duplicate AOCs, it became clear that for nine schools, one version was incomplete, and the other was complete. For each of these schools, an incomplete form had been presented during on-site monitoring. OSSE emailed the LEA's Director of Federal Programs and Grants on May 28, 2019 to ask why there were duplicate forms with conflicting information. The LEA's Director of Federal Programs and Grants responded on May 29, 2019 that they had asked the private school administrators to re-sign and re-date the forms to indicate that all of the required elements were discussed. On May 30, 2019, Whitney Meagher (OSSE) contacted three of the schools with duplicate forms. Each reported that DCPS had not been in contact with them recently about documentation from previous years.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p>Title I (Program) 2.10(a)</p> <p>Action Required (CONT'D): Beginning July 5, 2019, and by the 5th of each month for the 2019-20 school year, the LEA must submit to OSSE a list of their scheduled consultation visits for the following month. Additionally, within five business days of each consultation meeting with a private school official, DCPS must provide a copy of meeting notes, and a signed AOC form that indicates all required elements of consultation were discussed. OSSE will notify the LEA as to where this information should be sent moving forward.</p> <p>OSSE is continuing to review this matter and may require that additional steps be taken by the LEA.</p>					
<p>Title I (Program) 2.10(f)</p> <p>Finding: The LEA failed to provide evidence that it academically evaluated all programs serving private school students, or that necessary modifications were made to program delivery based on the evaluation findings.</p> <p>During the interview, the LEA discussed the use of Stride Academy as a way to continually evaluate the academic performance of participating private school students. The contracted service provider, Performance Management Services, LLC, (PMS) and administrators at each school have access to this program. Additionally, PMS provides administrators with a report of student academic results 2-3 times per year. However, the LEA did not provide evidence of these reports or the activities described.</p> <p>The LEA also provided evidence of evaluations of vendor performance.</p> <p>Action Required: Within 30 days the LEA must submit a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - how the LEA will share the results of the academic evaluation for each student with each private school (i.e. samples of PMS reports on student academic performance) - how the LEA modified the program delivery based upon the result of the student academic evaluations, as applicable (i.e. meeting notes that show academic performance and related program changes were discussed with private school administrators). 					
<p>Title I (Program) 3.1</p> <p>Finding: The LEA failed to provide evidence that it disseminated OSSE's complaint policy to parents. The LEA did provide a copy of a complaint policy in its Parents Right to Know Guide for the 2017-18 school year, but the policy fails to share information about OSSE's complaint policy.</p> <p>Action Required: Within 30 days, the LEA must provide a plan for the 2019-20 school year that indicates how the LEA will disseminate OSSE's complaint policy to parents.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p>Title II (Program) 2.1</p> <p>Finding: The LEA failed to provide written affirmations that consultation meetings occurred with each private school and that such meetings included all elements required by the law. The LEA did provide:</p> <ul style="list-style-type: none"> - City-Wide Consultation Agendas from three meetings (5/19/17, 10/26/17, 1/18/18) - a Sign-In Sheet from the 10/26/17 meeting - a handout from the 10/26/17 meeting (“City-Wide Consultation Questions and Answers”) - A follow-up email from the 1/18/18 meeting (dated 1/23/18) - A follow-up email from the 10/26/17 meeting (dated 11/2/18) <p>The LEA provided the following from the 30 participating private schools:</p> <ul style="list-style-type: none"> - Signed affirmations of consultation (AOCs) from 14 schools that indicated all elements of consultation required by the law had been discussed. However, the LEA did not provide signed AOCs that indicated that all elements of consultation required by law had been discussed with all participating schools as required. <p>Following the release of the Preliminary Monitoring Report, the LEA provided additional evidence that was received on May 22, 2019 including several AOCs and duplicate AOCs from the same school. When comparing the duplicate AOCs, it became clear that for ten schools, one version was incomplete, and the other was complete. For each of these schools, an incomplete form had been presented during on-site monitoring. OSSE emailed the LEA’s Director of Federal Programs and Grants on May 28, 2019 to ask why there were duplicate forms with conflicting information. The LEA’s Director of Federal Programs and Grants responded on May 29, 2019 to say that they had asked the administrators to re-sign and re-date the forms to indicate that all of the required elements were discussed. On May 30, 2019, Whitney Meagher (OSSE) contacted three of the schools with duplicate forms. Each reported that DCPS had not been in contact with them recently about documentation from previous years.</p>					
<p>Title II (Program) 2.1</p> <p>Action Required: Beginning July 5, 2019, and by the 5th of each month for the 2019-20 school year, the LEA must submit to OSSE a list of their scheduled consultation visits for the following month. Additionally, within five business days of each consultation meeting with a private school official, DCPS must provide a copy of meeting notes, and a signed AOC form that indicates all required elements of consultation were discussed. OSSE will notify the LEA as to where this information should be sent moving forward.</p> <p>OSSE is continuing to review this matter and may require that additional steps be taken by the LEA.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p><u>Title II (Program) 2.2</u></p> <p>Finding: The LEA provided PDF files of feedback from professional development surveys conducted in August 2017 and October 2017, respectively. The LEA also provided electronic files of LEAP coaching session presentations and handouts, sample templates, and a LEAP Leader roster for school year 2018-19. However, the LEA failed to provide evidence of systems developed for professional growth and improvement for the 2017-2018 school year.</p> <p>Action Required: Within 30 days, the LEA must provide a plan for the 2019-20 school year that indicates how the LEA will develop systems of professional growth and improvement for teachers, principals, and other school leaders.</p>					
<p><u>Title II (Program) 2.3</u></p> <p>Finding: The LEA failed to provide evidence that it engaged key stakeholders identified in ESEA §2102(b)(3)(A) in meaningful consultation regarding the professional development plan.</p> <p>Action Required: Within 30 days, the LEA must provide a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - A description of which stakeholders will be involved in the evaluation of its professional development activities; and - A description of how the LEA will document stakeholder feedback. 					
<p><u>Title II (Program) 2.4</u></p> <p>Finding: The LEA failed to provide evidence that it evaluated its professional development plan during the 2017-18 school year and revises it on an on-going basis.</p> <p>Action Required: Within 30 days, the LEA must provide a plan for the 2019-20 school year that includes:</p> <ul style="list-style-type: none"> - A description of how the LEA will evaluate its professional development activities on an on-going basis; and - A description of which stakeholders will be involved in the evaluation of its professional development activities. 					
<p><u>Title II (Program) 2.5</u></p> <p>Finding: The LEA failed to provide evidence of professional development activities to address the needs of all students including children with disabilities, English learners, and gifted and talented students for the 2017-18 school year.</p> <p>Action Required: Within 30 days, the LEA must provide a copy of its PD calendar related to addressing the needs of all students including children with disabilities, English learners, and gifted and talented students for the 2019-20 school year.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p><u>Title III (Program) 6.1</u></p> <p>Finding: The LEA failed to provide written affirmations that consultation meetings occurred with each private school and that such meetings covered all elements required by the law, including consultation to identify English learners that are located in the geographic area covered by the subgrantee. The LEA did provide:</p> <ul style="list-style-type: none"> - City-Wide Consultation Agendas from three meetings (5/19/17, 10/26/17, 1/18/18) - Sign-In Sheet from the 10/26/17 meeting - A handout from the 10/26/17 meeting (“City-Wide Consultation Questions and Answers”) - A follow-up email from the 1/18/18 meeting (dated 1/23/18) - A follow-up email from the 10/26/17 meeting (dated 11/2/18) <p>The LEA further provided the following from the 13 participating private schools:</p> <ul style="list-style-type: none"> - Signed affirmations of consultation (AOCs) from eight schools that indicated all elements of consultation required by the law had been discussed. However, the LEA did not provide signed AOCs that indicated all elements of consultation required by law had been discussed for all participating schools as required. <p>Following the release of the Preliminary Monitoring Report, the LEA provided additional evidence that was received on May 22, 2019 including several AOCs and duplicate AOCs from the same school. When comparing the duplicate AOCs, it became clear that for four schools, one version was incomplete, and the other was complete. For each of these schools, an incomplete form had been presented during on-site monitoring. OSSE emailed the LEA’s Director of Federal Programs and Grants on May 28, 2019 to ask why there were duplicate forms with conflicting information. The LEA’s Director of Federal Programs and Grants responded on May 29, 2019 to say that they had asked the administrators to re-sign and re-date the forms to indicate that all of the required elements were discussed. On May 30, Whitney Meagher (OSSE) was able to contact three of the schools with duplicate forms. Each reported that DCPS had not been in contact with them recently about documentation from previous years</p>					
<p><u>Title III (Program) 6.1 (CONT'D)</u></p> <p>Action Required: Beginning July 5, 2019, and by the 5th of each month for the 2019-20 school year, the LEA must submit to OSSE a list of their scheduled consultation visits for the following month. Additionally, within five business days of each consultation meeting with a private school official, DCPS must provide a copy of meeting notes, and a signed AOC form that indicates all required elements of consultation were discussed. OSSE will notify the LEA as to where this information should be sent moving forward.</p> <p>OSSE is continuing to review this matter and may require that additional steps be taken by the LEA.</p>					

CORRECTIVE ACTION PLAN TEMPLATE					
FINDING/ RECOMMENDATION	PROPOSED LEA CORRECTIVE ACTION	TIMELINE	RESPONSIBLE OFFICE/PARTY	EVIDENCE OF IMPLEMENTATION	SEA RESPONSE TO CAP
<p><u>Title IV, Part V (Program) 5.8</u></p> <p><u>Finding:</u> The LEA did not provide evidence showing that the most recent 21st CCLC annual evaluation was made available to the public.</p> <p><u>Action Required:</u> Within 30 days, the LEA must submit evidence that a copy of the most recent 21st CCLC annual evaluation is imbedded on DCPS' Out-of-School Time Program (OSTP) webpage. Evidence must include a screenshot of the OSTP webpage with the evaluation and a link to the evaluation on the OSTP webpage.</p>					



DISTRICT OF COLUMBIA
OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

December 21, 2018

Dr. Amada Alexander
Interim Chancellor
District of Columbia Public Schools
1200 First Street N.E.
Washington, DC 20002

Auditee:	District of Columbia Public Schools ("DCPS")
Federal Funding Agency:	U.S. Department of Agriculture
CFDA Numbers:	10.553, 10.555, 10.556 and 10.559
Compliance Requirement:	Eligibility
Audit Number:	2017-006 (Prior Year Finding #2016-003)
Audit Period:	October 1, 2016 through September 30, 2017

Dear Chancellor Alexander:

Based on the single audit conducted by BDO, USA, 8401 Greensboro Drive, Suite 800, McLean, VA 22102, for the audit period October 1, 2016 through September 30, 2017, the Office of the State Superintendent of Education ("OSSE") is issuing its Management Decision Letter (MDL), as required by 2 CFR § 200.331(d)(3) and 2 CFR § 200.521(b) of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements.

Audit Finding

Finding Number 2017-006 (Prior Year Finding Numbers 2015-003 and 2016-003). Below are selected excerpts of the finding. A complete copy of the finding is attached for your reference:

Program

U.S. Department of Agriculture, Child Nutrition Cluster – CFDA Numbers: 10.553 "School Breakfast Program", 10.555 "National School Lunch Program", 10.556 "Special Milk Program for Children", and 10.559 "Summer Food Service Program for Children."

Condition

We selected a sample of 120 students and 40 Community Eligibility Program (CEP)

schools in fiscal year 2017 to test DCPS' compliance with eligibility requirements. The sample of 120 consisted of 60 students who were determined to be eligible through the application process, and 60 students who were directly certified through participation in other federal assistance programs. During our testwork over the eligibility requirement for the Child Nutrition Cluster, we noted deficiencies in DCPS' eligibility determination process. These deficiencies also affected DCPS' ability to report complete and accurate meal count claims for reimbursement to the Office of the State Superintendent of Education (OSSE). Specifically, we noted the following:

- I. For schools not participating in CEP, claim reimbursement is based on the individual student level. For nine (9) students, per the students' account history in WebSMARTT, the students were served a meal on a day that the students' attendance record documented them as absent.
- II. For schools participating in CEP, claim reimbursement is based on total meals served on a daily basis. For two (2) instances in two (2) schools, the production records and edit check summary showed that the school claimed more meals than what was actually served. For one (1) instance in one (1) school, the production records and edit check summary showed the school claimed fewer meals than what was actually served.

Questioned Costs

Known amount is \$85.

Auditor's Recommendation

We recommend DCPS establish adequate controls over eligibility and reporting that ensure compliance with the requirements of the Child Nutrition Cluster. This includes (1) Data corrections are properly recorded in WebSMARTT; and (2) Enhance controls at the point of sale to improve the accuracy of identifying the student as they are served the meal.

Related Noncompliance

Material noncompliance.

Views of Responsible DCPS Officials and Planned Corrective Actions

DCPS agrees with the conditions and recommendations of this finding. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

Determination of OSSE

OSSE agrees with the reasoning of the auditor, sustains the finding, and concurs with the auditor's recommendation.

OSSE acknowledges the effort that DCPS has taken thus far to resolve this finding, which the auditor has now defined as material noncompliance due to the prolonged period of deficiency (4 years+).

After reviewing all of the documentation and information provided by DCPS, including the corrective action plan, OSSE concludes that DCPS has failed to establish effective internal controls to ensure compliance with Federal statutes, regulations, and the terms and conditions of the Federal award in accordance with 2 CFR § 200.303 and 7 CFR § 210.8(a). In order to resolve and prevent its recurrence, OSSE requires DCPS to design and implement controls that are effective in remedying the noncompliance, and ensuring the accuracy of monthly claims for reimbursement.

OSSE also observed through its many technical assistance interactions with DCPS that there is a noticeable disconnect among the various responsible units, which prohibits the elevated level of attention and urgency required to address this repeated noncompliance. Accordingly, DCPS should develop and implement the appropriate information technology (IT) capability to establish internal controls across units which ensure the accuracy of lunch counts prior to the submission of the monthly claim for reimbursement to OSSE.

As the pass-through entity, OSSE is required to ensure that its subawards are used for authorized purposes, in compliance with Federal statutes, regulations, and conditions of the subaward. 2 CFR § 200.331(d). This includes requiring subrecipients take timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means. 2 CFR § 200.331(d)(2). Accordingly, pursuant to the authority conferred to OSSE under 2 CFR § 200.207 and 2 CFR § 200.338 to impose specific conditions, as needed, when a subrecipient has a history of noncompliance, OSSE is imposing the following requirements:

1. During the development of the aforementioned IT capability and until its full implementation, beginning fiscal year 2019, DCPS shall implement a per claim verification process whereby each monthly lunch count is verified, and the supporting documentation must accompany each monthly claim reimbursement submitted to OSSE before the claim reimbursement is processed and paid by OSSE.
2. DCPS shall provide OSSE with quarterly updates on the development and implementation of the IT capability.
3. DCPS shall prepare and submit to OSSE, within 30 days of the date of this correspondence, a policy and procedure effectuating these conditions.

In regard to the known questioned costs of \$85, the USDA permits State agency to disregard an overpayment that does not exceed \$600. 7 CFR § 210.19(d).¹ Accordingly, OSSE does not require DCPS to repay the questioned costs.

Thank you for your cooperation in the resolution of this finding. If you have any questions or concerns regarding this matter, please contact Carol D'Avilar-Etkins at carol.davilar-etkins2@dc.gov or by phone at (202) 481-3845.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hanseul Kang', written in a cursive style.

Hanseul Kang
State Superintendent
District of Columbia Office of the State Superintendent of Education

¹ The School Breakfast Program (7 CFR § 220.15(c)) and the School Milk Program for Children (7 CFR § 215.13(c)) have the same threshold.

D.C. Schools Shortchange At-Risk Students

June 26, 2019

A report by the Office of the District of Columbia Auditor



Audit Team
Erin Roth, Director of Education Research
Will Perkins, Analyst

Executive Summary



What ODCA Recommends

1. DCPS should establish transparent base funding for each school tied to enrollment and grade level. The annual budget process should use a specific and transparent methodology so that school communities are informed on both the method and the results.
2. DCPS should publish each school's base funding and supplemental at-risk allocations so principals and LSATs can identify what is base funding and what is supplemental.
3. DCPS should establish internal controls for any adjustments to base funding, including policies and procedures for allocating at-risk funds.
4. The Council should amend D.C. Code to strengthen at-risk provisions on "supplement not supplant" and apply these provisions to all public schools in D.C. to aid in its oversight of compliance with the at-risk funding requirements.
5. The District should evaluate and continuously improve its at-risk funded programs. In partnership with the forthcoming Research Practice Partnership (RPP),⁷⁰ DME should initiate formal research on the context and impact of its at-risk funded initiatives, using rigorous quantitative and qualitative methods.
6. The Council should require consistent reporting of at-risk spending across all public schools.

Why ODCA Did This Audit:

ODCA conducted this audit as a follow-up of our 2017 study, *Budgeting and Staffing at Eight DCPS Elementary Schools*, which found schools sometimes used at-risk funds to provide core staffing. Given the issues stemming from the ongoing achievement gap within the District's public schools, ODCA initiated this follow-up study to assess DCPS's compliance with requirements that at-risk funds be "supplemental to the school's gross budget and shall not supplant any Formula, federal, or other funds to which the school is entitled." The study also tracks the proposed budget uses of at-risk funding from FY 2016 to FY 2020.

What ODCA Found:

- DCPS schools with high concentrations of at-risk students often received reduced base funding, a violation of the D.C. Code. In contrast, schools with low concentrations of at-risk students often received base funds that either matched or exceeded their staffing formula requirements.
- Schools with more at-risk students received less base funding for related arts teachers and the majority of at-risk funds budgeted for these staff were misused.
- ODCA found significant evidence of misuse of at-risk funds budgeted for social workers and psychologists, particularly in schools with high concentrations of at-risk students.
- The District has spent more than \$450 million in at-risk funds without a measurable and consistent strategy.

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Background

The Fair Student Funding and School-Based Budgeting Amendment Act of 2013 authorized supplemental funding for schools with students who are considered at risk of academic failure.¹ These funds are specifically intended to improve the academic outcomes of District students who are homeless, in foster care, receive Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families program funds, or are at least one year over-age for their grade in high school.² Notably, students can and do fall into more than one of these categories;³ in school-year 2017-18, almost 40 percent of students considered at-risk met two of these categories. In the current fiscal year, the District allocated over \$100 million in at-risk funding to improve the academic outcomes of approximately 40,000 students now considered at-risk.

Our 2017 study, *Budgeting and Staffing at Eight DCPS Elementary Schools*, found some of the schools in our sample essentially misused at-risk funds to pay for required staff like related arts teachers. Given the issues stemming from the ongoing achievement gap within the District's public schools, ODCA initiated this follow-up study to assess the District of Columbia Public Schools' (DCPS) use of at-risk funding in FY 2018, the most recently completed fiscal year.

Persistent Achievement Gaps

Although the District's overall standardized test scores are improving, persistent gaps remain between students who are eligible for free and reduced-price lunch and those who are not eligible. The National Assessment of Educational Progress (NAEP), also known as, The Nation's Report Card, provides a comparable method for assessing gaps in achievement between these two student groups over time in D.C.⁴

Importantly, out of four gaps measured in fourth grade and eighth grade reading and math scores, between students who were eligible for free and reduced-price lunch and students who were not eligible, none of the gaps have reached a statistically significant level of improvement, and in fact, two have significantly worsened. More specifically, both the eighth grade reading and math gaps have grown between 1998 and 2017 and between 2000 and 2017. The fourth grade reading and math gaps have not significantly changed between 1998 and 2017 and between 2000 and 2017.⁵

1 The Fair Student Funding and School Based Budgeting Act of 2013, Law Number L20-0087, effective February 22, 2014, D.C. Code § 38-2905.01.

2 D.C. Code § 38-2901(2A).

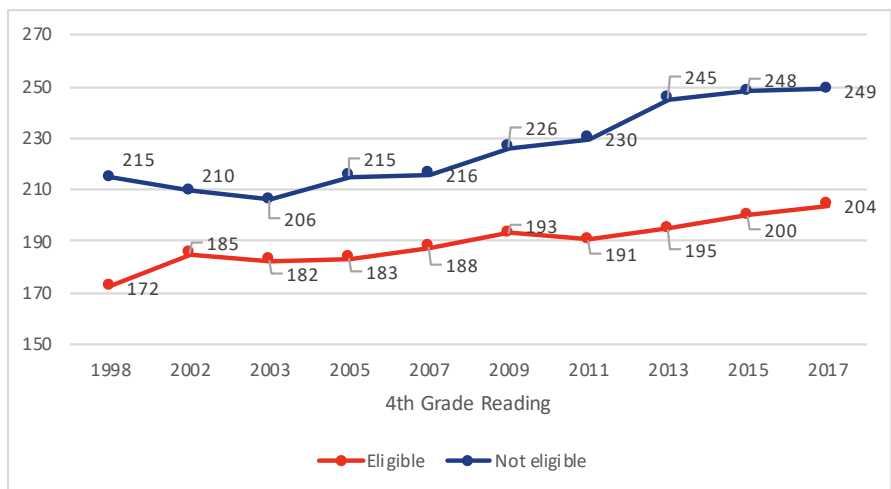
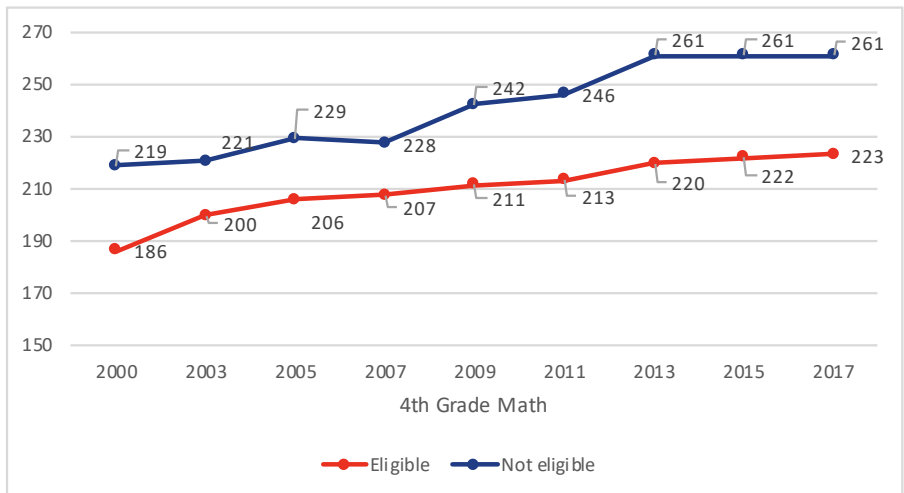
3 OSSE, UPSFF Working Group, Slide 10, November 29, 2018: https://osse.dc.gov/sites/default/files/dc/sites/osse/page_content/attachments/UPSFF%20Working%20Group%20November%20Meeting%20presentation.pdf

4 NAEP is administered to a sample of students in fourth grade and eighth grade in every state. The subgroup sample results are compared, and any gaps found are tested for statistical significance to confidently assert that they do or do not likely represent real gaps in the larger underlying population of DCPS students. Therefore, the term "significant" identifies "statistically dependable population differences," based on tests of statistical significance. More information here: <https://nces.ed.gov/nationsreportcard/guides/statsig.aspx>

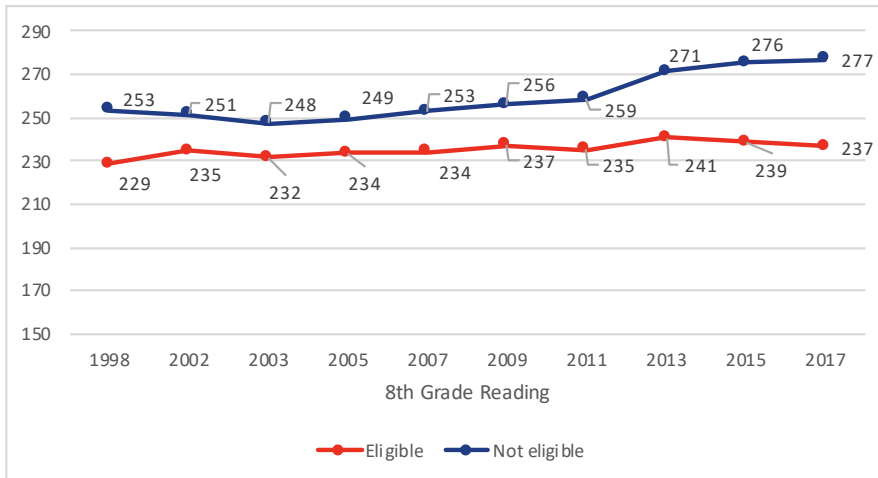
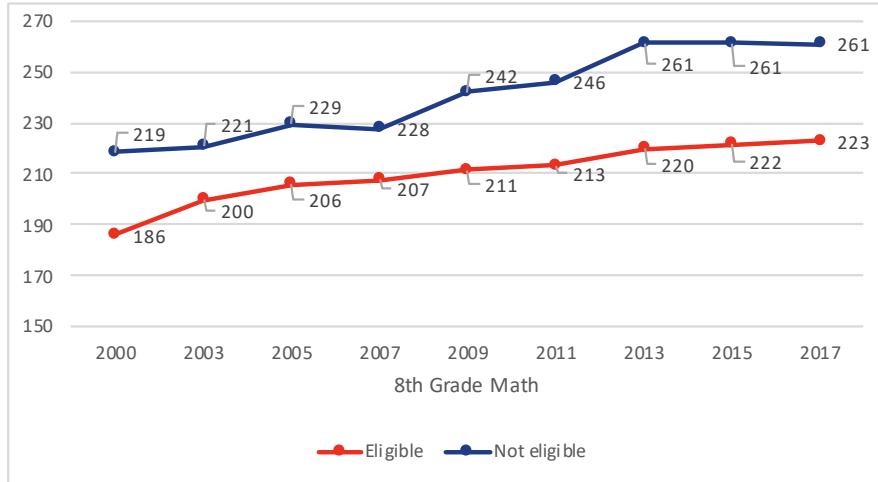
5 OSSE, "National Assessment of Educational Progress (NAEP)", accessed May 14, 2019: <https://osse.dc.gov/service/national-assessment-educational-progress-naep>

While none of the gaps between students eligible for free and reduced-price lunch and those not eligible have improved, the gap between fourth grade reading and math scores of black and white students have both narrowed from 1998 to 2017 and 2000 to 2017.⁶

Figure 1: Statewide NAEP 4th Grade and 8th Grade Math and Reading Scores by Free or Reduced Price Lunch Eligibility



6 OSSE, "National Assessment of Educational Progress (NAEP)", accessed May 14, 2019: <https://osse.dc.gov/service/national-assessment-educational-progress-naep>



Source: National Assessment of Education Progress (NAEP), 1998–2017

Additional Targeted Funds Proven to Help Close Gaps

Multiple rigorous studies have shown that school finance reforms providing additional money targeted to low-income students can help close the achievement gap.⁷ The District of Columbia Public Education Finance Reform Commission, convened in 2011, met to study and report on revising the Uniform Per Student Funding Formula (UPSFF) to improve its equity, adequacy, affordability, and transparency. One of the commission’s recommendations was that the Mayor study the costs of providing an adequate education in the District of Columbia. The Office of the Deputy Mayor for Education (DME) published the follow-up study, [Cost of Student Achievement: Report of](#)

7 Kreisman, Daniel, and Matthew P. Steinberg. (2019). The Effect of Increased Funding on Student Achievement: Evidence From Texas’s Small District Adjustment. (EdWorkingPaper: 19-58). Retrieved from Annenberg Institute at Brown University: <http://www.edworkingpapers.com/ai19-58>; Baker, Bruce “Does Money Matter in Education?”, Second Edition, Albert Shanker Institute 2016; Jackson, C. Kirabo et. al., “Boosting Educational Attainment and Adult Earnings: Does school spending matter after all?”, *Education Next* Fall 2015, Vol. 15, No. 4.

[the DC Education Adequacy Study](#), in December 2013. The study team recommended raising the UPSFF base for instructional purposes up to \$10,557 per student (\$11,520 in 2019 dollars).⁸ The study also recommended adding a 0.37 weight for students at risk of academic failure, which would supersede the original 0.17 summer school weight.

D.C. Targets At-Risk Funds to Close the Gap

Then D.C. Councilmember David Catania, who chaired the Committee on Education, introduced the Fair Student Funding and School-Based Budgeting Act of 2013, on June 4, 2013.⁹ The bill originally added a weight for all students identified as eligible for free or reduced lunch and students attending high schools with graduation rates of less than 75 percent in the prior year.¹⁰ After debate and review of draft recommendations from the previously released Cost of Student Achievement report, the final bill authorized a new at-risk weight, defined as a student who is one or more of the following:

- Homeless.
- In the District’s foster care system.
- Qualifies for the Temporary Assistance for Needy Families program or SNAP.
- A high school student who is one year older, or more, than the expected age for the grade in which the student is enrolled¹¹.

The Fair Student Funding Act includes specific requirements for DCPS’s use of at-risk funds and no specific requirements for public charter schools’ use of at-risk funds.¹² For DCPS, the law requires that at least 90 percent of at-risk funding go toward school-level budgets and that the Central Office distribute funds proportionately based on each school’s at-risk enrollment projection.¹³ DCPS must also use its at-risk funds “for the purpose of improving student achievement among at-risk students.”¹⁴ DCPS’s at-risk funds must be *supplemental* to each school’s gross budget and not *supplant* any UPSFF, federal, or other funds to which the school is otherwise entitled.¹⁵ The 2013 law also gave principals discretion over the use of the funds, but this provision was amended in 2015 to give the Chancellor direction over at-risk fund allocation.¹⁶

DCPS Central Office Directs the School-Level Budgeting Process

DCPS uses the centrally-managed Comprehensive Staffing Model (CSM) to fund its schools. DCPS began using the CSM in school year 2008-09 to ensure that students had access to the same opportunities regardless of their school’s size or location. Central Office allocates funds for average staff costs based on enrollment projections and programmatic needs, building a new budget from zero each year. DCPS limits principal autonomy over budgets,

8 In September 2012, the DME contracted with The Finance Project (a Washington-based policy research and technical assistance firm) and their sub-contractor, Augenblick, Palaich and Associates (a Denver-based education research firm) to complete the DC Education Adequacy Study.

9 B20-309, “Fair Student Funding and School Based Budgeting Act of 2013”.

10 B20-309, Sec. 2.

11 D.C. Code § 38–2901(2A).

12 B20-309, “Fair Student Funding and School Based Budgeting Act of 2013”

13 D.C. Code § 38–2907.01(a)(3).

14 D.C. Code § 38–2907.01(b)(1).

15 D.C. Code § 38–2907.01(b)(3).

16 See Title IV, Subtitle D of the “Fiscal Year 2016 Budget Support Act of 2015,” Law Number L21-0036, effective October 22, 2015, which amends D.C. Code § 38-2907.01(b)(1).

giving them flexibility with limited, non-required positions like front office staff and non-personal funds like supplies.¹⁷

Our 2017 study, *Budgeting and Staffing at Eight DCPS Elementary Schools*, found that each school in the sample generally complied with the CSM, but compliance was sometimes achieved by using at-risk funds to fill in when the base allocation was insufficient.¹⁸ Because the CSM funds positions and not students, per-pupil spending may also vary widely by school. Small schools generally see higher per-pupil averages because they spread the fixed costs of average salaries (not actual salaries) for required positions across fewer students.

Below we describe how DCPS allocates funds for related arts teachers, social-emotional positions including social workers and psychologists, and the extended year program—the top three budgeted uses of at-risk funds in school-year 2017-18. While related arts teachers and social workers and psychologists are required positions in the CSM, the extended year program is not required and is in addition to the CSM. The subsequent audit results section articulates the relevant findings associated with each of these categories of at-risk budgeting.

How DCPS Directs the Budgeting Process for Related Arts Staff in Elementary Schools

The FY 2018 School Budget Development Guide provides additional detail regarding the CSM and states that elementary students will have 45 minutes of special instruction each day. This special instruction should include art, health, music, physical education, and world language, each at least once a week at minimum.¹⁹ Principals may petition the Central Office to reallocate funds from required positions but, as shown in our 2017 report, a request to defund a part-time related arts teacher was denied on the grounds that the position is required for elementary schools.²⁰

Therefore, if at-risk funds were allocated to required related arts staff positions, principals had no choice but to use the funds in this way and were likely unaware that at-risk funds, in particular, were budgeted for these positions until the end of the budget process, when submitted budgets are published.²¹

17 DC Public Schools: FY20 LSAT Roundtables January 2019, retrieved from: <https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/January%20LSAT%20Roundtables%20FY20%20PPT%20FINAL.pdf>

18 Office of the DC Auditor, *Budgeting and Staffing at Eight DCPS Elementary Schools*, October 30, 2017.

19 District of Columbia Public Schools, "School Budget Development Guide Fiscal Year 2018 (FY18)," Updated February 2017, page 61: <https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/FY18%20Budget%20Guide.pdf>.

20 Office of the District of Columbia Auditor, "Budgeting and Staffing at Eight DCPS Elementary Schools," October 30, 2017, page 33: http://zd4l62ki6k620lqb52h9ldm1.wpengine.netdna-cdn.com/wp-content/uploads/2018/07/DCPS.Staffing.Report.Final_.10.30.17.pdf.

21 At-risk fund uses are published in the final phase of the DCPS budget process, i.e., in the submitted budget phase. The DCPS data center provides both initial and submitted budgets across multiple years showing when at-risk funds are public: <https://www.dcpsdata-center.com>

Figure 2: CSM Formula Related Arts Teachers in DCPS Elementary Schools

Projected School Enrollment	Total Art, Music, P.E., and World Language Teachers
Fewer than 400 students “small”	3.0
Between 400 and 599 students “medium”	4.5
600 or more students “large”	5.5

Source: DCPS Fiscal Year 2018 Elementary School Comprehensive Staffing Model

How DCPS Directs the Budgeting Process for Social Workers & Psychologists

Social workers and psychologists can provide a variety of school-based mental health support services. According to the DCPS budget guide, the social worker’s primary role is to “address student engagement, work to ensure optimal mental health functioning, and provide behavior support needs of all students.”²² School psychologists provide similar academic and behavior supports, but also provide cognitive and psychological assessments required to identify students’ special education needs.²³ Importantly, they also play an essential compliance role for students with Individualized Education Programs (IEPs). More specifically, in compliance with the federal Individuals with Disabilities Education Act (IDEA), social workers and psychologists provide targeted behavioral support services and assessments for students with these needs on their IEPs.²⁴

DCPS allocates social workers and psychologists under the Schoolwide Instructional Support portion of its CSM. DCPS does not publish the exact formula used to allocate social workers and psychologists but identifies the categories below as the basis for its formula. An outline of the formula received from the DCPS Budget Office is provided in Appendix H.

- Assessments (functional behavior, social history, and psychological) held during the past school year.
- Student Support Team (SST) meetings held during the past school year.
- Manifestation Determination meetings held during the past school year.
- Individualized Education Programs (IEPs).
- Behavior Support Service (BSS) hours present in the school’s IEPs.²⁵

Therefore, while the DCPS budget guide description for social workers and psychologists highlights the role they can play for all students in a school, the formula used to allocate these staff positions is made up of almost entirely IDEA-mandated services, creating a disconnect between the formula and potential responsibilities.

Importantly, before sending initial budget allocations to schools, DCPS adjusts each school’s formula allocation “based on other qualitative knowledge that mental health program managers, [instructional] superintendents, and others know about the school.”²⁶

22 DCPS Budget Guide, FY 2018, p. 39, accessed May 14, 2019: <https://dcps.dc.gov/page/budget-archives>.

23 DCPS Budget Guide, FY 2018, p. 40, accessed May 14, 2019: <https://dcps.dc.gov/page/budget-archives>.

24 IDEA §300.34.

25 DCPS Budget Archives, FY 2018, accessed May 14, 2019: <<https://dcps.dc.gov/page/budget-archives>>.

26 Email exchange with DCPS Director of School Funding, April 10, 2019.

Principals receive their initial budgets and may petition for adjustments before budgets are submitted as part of the Mayor’s overall budget that goes to the D.C. Council in early spring. For school-year 2017-18, four principals asked to eliminate their school’s social worker allocations²⁷ and two principals eliminated their school psychologist allocations.²⁸ None of these six schools used at-risk funding to replace social workers or psychologists eliminated with petitions.

Unlike in the prior case of related arts teachers, principals could decrease social worker and psychologist staffing levels. However, both related arts teachers and social workers and psychologists are listed as required, not flexible or optional positions in the DCPS Budget Development Guides.²⁹ Therefore, the enforcement of required positions is not consistently applied.

How DCPS Directs the Budgeting Process for Its Extended-Year Program

DCPS budgeted \$5 million—10 percent of its at-risk budget in fiscal year 2018 -to provide an extended school year at 11 schools. DCPS began its extended-year program at Raymond Education Campus as a pilot in school year 2015-16, then expanded it to 10 other schools for the next three school years: 2016-17, 2017-18, and 2018-19. In school years 2016-17 and 2017-18, DCPS built two intersession weeks into the middle of its extended-year calendar so that students in need of targeted support could receive more attention. Extended-year schools received additional funding in the form of 12-month salaries for their teachers and instructional aides, as well as additional non-personal services funding per student.³⁰

Figure 3: Instructional Days in DCPS Traditional and Extended-Year Calendars

School Year ³¹	Traditional Calendar Student Days	Extended-Year Student Days ³²	Extra Instructional Days for Extended-Year Schools
2016–17	181	197	16 days
2017–18	180	190	10 days
2018–19	181	191	10 days

Source: DCPS Calendars

Extended-year programs target summer learning loss, sometimes referred to as the “summer slide.” Research has shown that, on average, student achievement declines over the summer equivalent to one month’s worth of learning time.³³ Additionally, a meta-analysis of summer reading interventions found that lower-income students may benefit

27 Banneker Academic High, Drew Elementary, Randle Highlands Elementary and Ross Elementary Schools; DCPS Responses to FY2018 Performance Oversight Questions, p. 29.

28 MacFarland Middle and Ballou STAY schools; DCPS Responses to FY18 Performance Oversight Questions, p. 29.

29 District of Columbia Public Schools, “School Budget Development Guide Fiscal Year 2018 (FY18),” Updated February 2017, page 41: <https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/FY18%20Budget%20Guide.pdf>

30 DCPS Budget Guide, FY 2018, p. 27, accessed May 14, 2019: <<https://dcps.dc.gov/page/budget-archives>>.

31 DCPS Calendars, accessed May 14, 2019: <<https://dcps.dc.gov/page/dcps-calendars>>.

32 Excludes intersession breaks built into school-years 2016-17 and 2017-18.

33 Quinn, David M. & Polikoff, Morgan, “Summer learning loss: What is it, and what can we do about it?” Brookings Institution, September 14, 2017.

more than higher-income students when attending the same program.³⁴ Research on the practices of effective charter schools also found extending time on task to be an effective means of raising student achievement.³⁵

Where Are Students Considered At-Risk?

Over the last five years, from school-year 2015-16 through 2018-19, the percentage of students considered at-risk across the District has decreased from 46 percent to 43 percent. This decrease is driven primarily by a decrease in the percentage and number of at-risk students served in DCPS schools from 48 percent to 44 percent (23,015 to 21,554 students). Public charter schools also have seen a smaller decrease from 44 percent to 43 percent at-risk; however, the total number of at-risk students served by public charter schools has increased from 16,601 to 18,731 students.

Figure 4: Number of DCPS and Charter School Students Considered to Be At-Risk, FY 2015-FY 2019

Year	DCPS	At-Risk	%	Charter	At-Risk	%	Total	At-Risk	%
FY15	47,548	23,015	48%	37,684	16,601	44%	85,232	39,616	46%
FY16	48,439	23,057	48%	38,905	17,040	44%	87,344	40,097	46%
FY17	48,510	21,470	44%	41,491	17,887	43%	90,001	39,357	44%
FY18	47,982	20,987	44%	43,340	18,930	44%	91,322	39,917	44%
FY19	48,902	21,554	44%	43,911	18,731	43%	92,813	40,285	43%

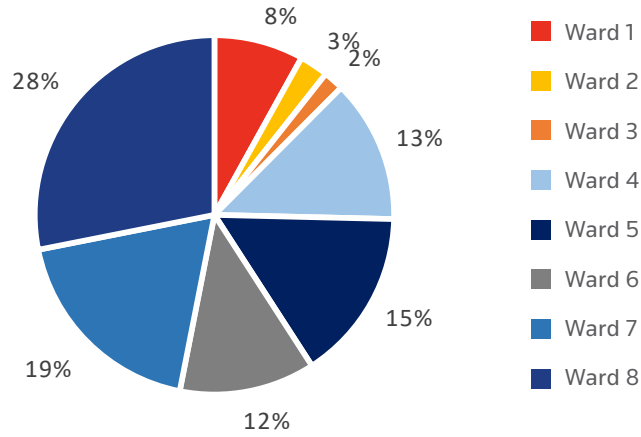
Source: OSSE Audited Enrollment

Looking more closely at school-year 2017-18, 44 percent of students enrolled in DCPS or charter schools were considered at-risk; however, the distribution of these students varies by ward, school, grade band, and sector. The ward representing the lowest percentage of students considered at-risk is Ward 3, with only 2 percent of students considered at-risk, and the Ward representing the highest percentage of students considered at-risk is Ward 8, with 28 percent.

34 Kim, James S. & Quinn, David M. "The Effects of Summer Reading on Low-Income Children's Literacy Achievement From Kindergarten to Grade 8: A Meta-Analysis of Classroom and Home Interventions" Review of Educational Research, 83(3), 386-431, 2013.

35 Fryer, Roland G. "Learning from the Successes and Failures of Charter Schools," The Hamilton Project, page 6, September 2012.

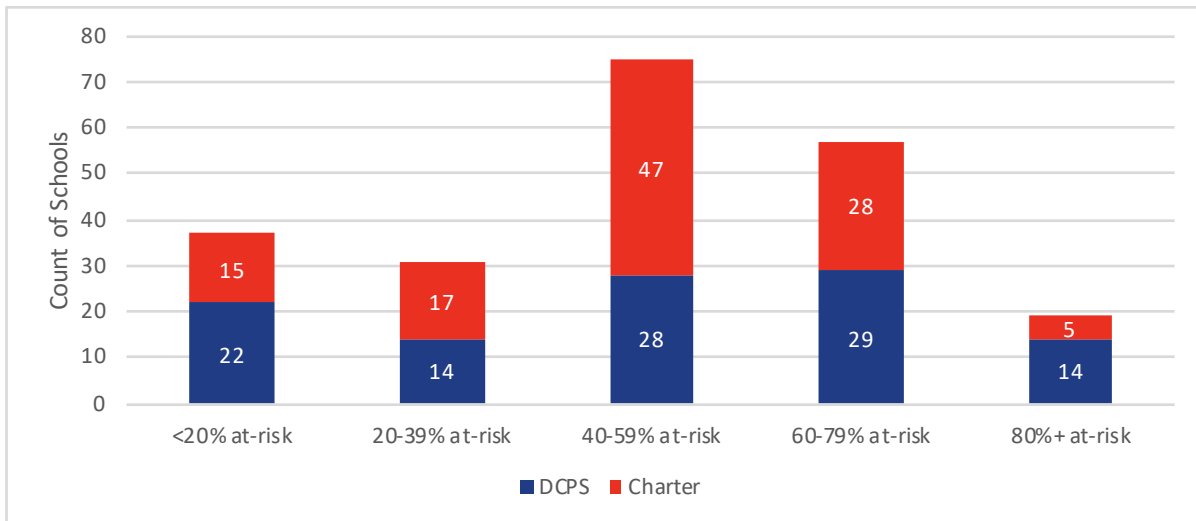
Figure 5: Distribution of At-Risk Enrollment by Ward in All Schools, FY 2018



Source: OSSE Audited Enrollment

As shown in Figure 5, DCPS schools tend to enroll both the highest and lowest concentrations of students considered at-risk. In school-year 2017-2018, 22 of the 37 schools enrolling 20 percent or less at-risk students were DCPS schools. Conversely, 14 of the 19 schools enrolling 80 percent or more at-risk students also were DCPS schools. The largest group of charter schools are in the middle range of more than 40 percent at-risk enrollment but less than 60 percent. Overall, 151 of 235 schools eligible to enroll at-risk students (64 percent) enroll at least 40 percent at-risk students.

Figure 6: UPSFF Enrollment by At-Risk Concentration and Sector, All PK-12th Schools FY 2018



Source: OSSE Audited Enrollment

Objective, Scope, and Methodology

Objectives

1. Evaluate DCPS's compliance with "supplement not supplant" requirements for at-risk funding in FY 2018.
2. Identify and track the specific uses of at-risk funding, in DCPS and charter schools, since its inception in the FY 2015 budget.

Scope

Our scope consists of four categories of information:

- If and to what extent at-risk funds were misused (used contrary to provisions in the statute) within the top three uses of at-risk funds in DCPS's FY 2018 submitted school-level budgets, including the allocation of related arts teachers, social workers, and psychologists, and the phase out of the extended year program.
- The difference between the use of at-risk funds in extended year schools in FY 2019 and FY 2020, again to determine if and to what extent at-risk funds were misused, by leveraging the unique opportunity provided by the phase-out of the extended year program in FY 2020.
- The uses of at-risk funds in DCPS across five years, from FY 2016 to FY 2020.
- The available public charter school at-risk funding reports from FY 2016 to FY 2020.

To complete the analyses, we used the following data sources in addition to correspondence with DCPS and PCSB staff:

- DCPS at-risk submitted budgets, FY 2016 to FY 2020.
- PCSB reports on at-risk spending FY 2015-2019.
- OSSE audited enrollment.
- OSSE report card data on demographics within STAR data.
- DCPS budget guidance documents including CSM and development guide.
- DCPS projected enrollments by school.
- DCPS social worker and psychologist school-based allocations, underlying formula and inputs for FY18 (from DCPS Budget Office).³⁶

Methodology

The D.C. Code states that DCPS's at-risk funds must be supplemental to each school's gross budget and not supplant any UPSFF, federal, or other funds to which the school is entitled.³⁷ In other words, replacing or compensating for gaps in formula funds with supplementary dollars is *supplanting*. The underlying assumption is that at-risk funds are supplemental only if underlying base funding is allocated without regard to each school's at-risk concentration.

³⁶ Other mental health support staff may be serving in schools in addition to DCPS staff. These additional staff may be provided by the Department of Behavioral Health or through public-private partnerships. The allocations described in this report do not include providers outside of DCPS.

³⁷ D.C. Code § 38-2907.01(b)(3).

As mentioned earlier, the same provision does not apply to the at-risk funds provided to public charter schools in the District. Therefore, our analysis of if and to what extent at-risk funds are supplemental can only be applied to DCPS.

We modeled our analysis of at-risk “supplement, not supplant” after OSSE’s Title I, Part A guidance for local education agencies (LEAs).³⁸ The Council’s Committee on Education has long considered at-risk “supplement, not supplant” to be similar to federal “supplement, not supplant” requirements for Title I funding.³⁹ LEAs demonstrate compliance by showing that each school in their system receives “all of the local funds they would otherwise receive if Title I funds were not available.”⁴⁰ LEAs have flexibility to determine their own funding methodologies but must ensure that local funding is distributed to schools without regard to Title I status, a concept referred to as “Title I-neutral.”

Therefore, to accomplish our first objective, we checked for “at-risk neutrality,” e.g., the allocation of non-at-risk funds (“base funding”) without regard to at-risk status. To identify each school’s base funding, we subtracted any at-risk funded items from each school’s submitted budget. Next, we compared each school’s base funding versus the amount entitled to each school through DCPS’s CSM. Any use of at-risk funds to pay for CSM-required positions was classified as a misuse of funds.

Figure 7: Schematic of ODCA Supplement not Supplant (SNS) Analysis Methodology

Item	DCPS submitted budgets (A)	DCPS at-risk funded items (B)	Formula-driven FTEs (C)	Base-funded FTEs (D)
Source	DCPS Interactive Data Center website	Fiscal Year 2018 Submitted Documents	DCPS-supplied formula	Submitted (A) minus At-Risk (B)
Method	If Base-funded FTEs (D) < Formula-driven FTEs (C) = Supplanted At-Risk Funding			

We also applied federal guidance to evaluate the use of at-risk funds to pay for schoolwide programs like extended-year.⁴¹ Schools are allowed flexibility to allocate Title I funds for schoolwide programs if they enroll at least 40 percent or more students who are economically disadvantaged and the program meets the “intent and purposes” of federal funding.⁴² Similarly, we deemed it appropriate to use at-risk funding to support schoolwide programming at schools projected to enroll at least 40 percent or more at-risk students and where the program met the purposes of

38 Office of the State Superintendent of Education, “Guidance for Local Educational Agencies (LEAs): Understanding Supplement Not Supplant (SNS) Under Title I, Part A of the Elementary and Secondary Education Act (ESEA),” accessed May 30, 2019: https://osse.dc.gov/sites/default/files/dc/sites/osse/page_content/attachments/ESSA%20Title%20I%20Supplement%20Not%20Supplant%20OSSE%20Guidance%20for%20LEAs.pdf.

39 Grosso, David. “Report and Recommendations of the Committee on Education on the Fiscal Year 2020 Budget for Agencies Under Its Purview,” published May 2, 2019, p. 34; Grosso, David. “Report and Recommendations of the Committee on Education on the Fiscal Year 2019 Budget for Agencies Under Its Purview,” published May 4, 2018, p. 27; Grosso, David. “Report and Recommendations of the Committee on Education on the Fiscal Year 2018 Budget for Agencies under Its Purview,” published May 18, 2017, p. 15; Grosso, David. “Report and Recommendations of the Committee on Education on the Fiscal Year 2017 Budget for Agencies under Its Purview,” published May 5, 2016, p. 13.

40 ESEA, Sec. 1118(b)(2); 20 U.S. Code 6321(b)(2).

41 Department of Education, “Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program: Non-Regulatory Guidance,” published September 2016, p. 2.

42 ESEA, Sec. 1114(a)(3)(C).

at-risk funding: “improving student achievement among at-risk students.”⁴³

To accomplish our second objective we collected, recorded, and categorized all uses of at-risk funding from FY 2015 through FY 2020. However, this analysis focuses on all available data on the use of at-risk funds starting in FY 2016 when funds were initially allocated to schools based on enrollment. According to the Committee on Education, in FY 2015 DCPS funded “a variety of initiatives, some of which support[ed] at-risk students generally.”⁴⁴ Therefore, the following section outlines the trends in at-risk submitted budgets over the five fiscal years, 2016 to 2020, when the Mayor has complied with D.C. Code requirements for proportional school-level funding.⁴⁵

We analyzed DCPS’s school-level budgets rather than expenditures, because FY 2020 is the first year that an at-risk funding code was included in the District’s financial management system which will allow for at-risk expenditure tracking in DCPS schools.⁴⁶

The same budget line-item information is not available for public charter schools. We, therefore, reviewed the four at-risk funding reports published by the Public Charter School Board⁴⁷ (PCSB) to evaluate the data available from the charter sector’s self-reported use of at-risk funds.

To track DCPS’ use of at-risk funding, ODCA aggregated DCPS’s funded items list into eight distinct categories (see the table below). Each category is mutually exclusive and based on an aggregation of DCPS budget guide categories.⁴⁸ Appendix G contains a full list of categorized items by fiscal year.

Category Name	Example Funded Items
Classroom instruction	General education teachers
Extended learning time	Extended day, year and afterschool
Leadership & school operations	Assistant principals, clerks and custodians
Non-personnel services	Supplies, contractual services, field trips
Related arts teachers	Physical education teachers, music teachers
Schoolwide instructional support positions	Instructional coaches, reading specialists
Social-emotional positions	Social workers, psychologists, behavior technicians
Special education positions	Special education coordinators and teachers

This report was drafted, reviewed, and approved in accordance with the standards outlined in ODCA’s Policy and Procedure Manual.

43 D.C. Code § 38–2907.01(b)(1).

44 Catania, David A. “DRAFT Report and Recommendations of the Committee on Education on the Fiscal Year 2015 Budget for Agencies under Its Purview”, p. 20, May 15, 2014.

45 D.C. Code § 38–2907.01(a)(3).

46 P.R. 22-1054, “Fiscal Year 2020 Budget Submission Requirements Resolution of 2018,” Sec. 3(2)(E).

47 PCSB, “At-Risk Funding Reports”, available: <https://www.dcpscsb.org/report/data/risk-funding-reports>.

48 Each DCPS Budget Guide is available on “DCPS Budget Archives”: <https://dcps.dc.gov/page/budget-archives>.

Audit Results

The top three uses of at-risk funding in fiscal year 2018 were related arts teachers in standalone elementary schools (\$6.3M), social workers and psychologists⁴⁹ (\$5.9M) and funding for extended-year programming (\$5.0M). We found DCPS often reduced base funding for schools projected to enroll the most at-risk students resulting in a large portion of at-risk funds supplanting base funding in violation of the law. Moreover, we found evidence that DCPS routinely *adjusts down* its allocations for school-based mental health staff in schools with students with the most critical social-emotional needs.⁵⁰ In addition, in reviewing the submitted uses of at-risk funding over a five-year period, we found no discernible strategy or consistency in how District schools budget for or report using at-risk funding.

DCPS reduced FY 2018 base funding at schools with high concentrations of at-risk students.

D.C. Code requires that DCPS at-risk funds “be supplemental to the school’s gross budget and shall not supplant any Formula, federal, or other funds to which the school is entitled.”⁵¹ Our analysis found that schools with larger concentrations of projected at-risk enrollment received lower base allocations for two of the three items evaluated in this analysis—elementary related arts and combined social workers and psychologists. The third item analyzed, extended-year programming, was a supplemental schoolwide program for the 11 participating schools, in alignment with Title I guidance for schoolwide programs. However, when the extended-year program was ended in fiscal year 2020, the formerly supplemental at-risk dollars were supplanted and used to cover the budgeting of staff who had been funded the year prior with base funds.

This substantial supplanting effectively placed a heavier burden on schools with more need. D.C. Code gives direction of at-risk funds to the Chancellor,⁵² leaving most school leaders unaware of how their at-risk funds have been allocated and they are therefore unable to re-direct funds as they see fit. Without informed school-level stakeholders and decision-makers there are few external checks on a highly centralized process.

DCPS first published guidance on the use of at-risk funds in its FY 2020 budget guide, but included only one parameter: that at-risk funds could not fund custodial services, which it then itself violated in submitted FY 2020 budgets.⁵³ Without robust guidance on the appropriate use of at-risk funds, DCPS appears to use them to fill in gaps at high need schools.

Finally, there have been signs that past DCPS leaders misunderstood the supplemental requirements of at-risk funding. Former interim chancellor John Davis testified in 2016 that “if we had used a perfectly layered system, first allocating all non-at-risk funds, then allocating at-risk funds, some schools would have seen dramatic reductions in their budgets.”⁵⁴ Mr. Davis was describing an “at-risk neutral” system as envisioned by the original Fair Student

49 Analysis excludes Ron Brown College Preparatory High School and MacFarland Middle School which were not part of the formula-driven allocations in FY18. RBPHS paid for one psychologist using at-risk funds.

50 As defined by the “total hours per month required” within the CSM formulas for allocating social workers and psychologists to schools.

51 D.C. Code § 38–2907.01(b)(3).

52 D.C. Code § 38–2907.01(b)(1).

53 DCPS FY20 Budget Development Guide: https://www.dcpsdatacenter.com/assets/docs/fy20_budget_guide.pdf; FY2020 Budget Oversight Questions and Responses: <http://www.davidgrosso.org/grosso-analysis/2019/03/25/fy2020-budget-oversight-questions-and-responses>

54 October 27, 2016; Public Hearing on “At Risk Funding for Public Schools”.

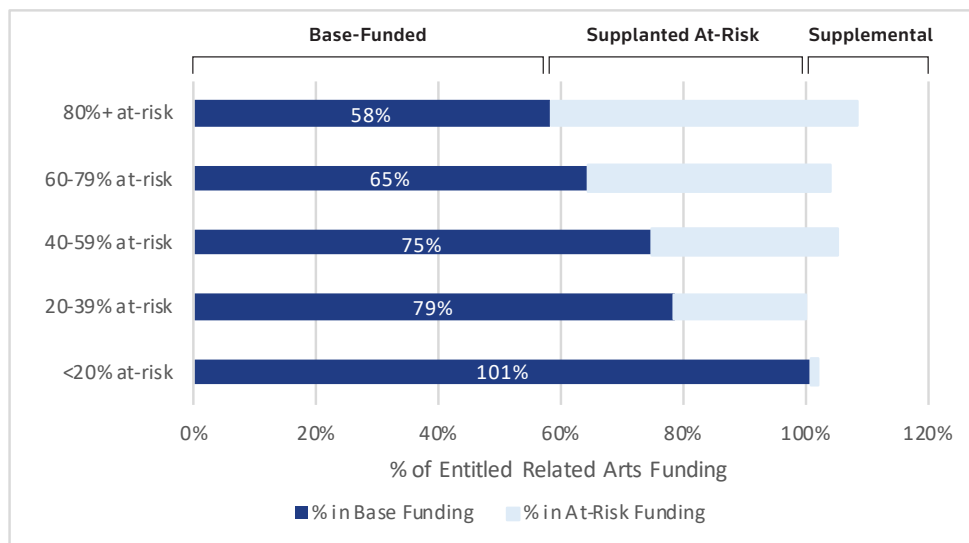
Funding Act. The DCPS practice we have documented of over-funding what the CSM requires for some schools with fewer at-risk students could not be sustained if funds were first allocated equitably, then supplemented with at-risk funds. Former chancellor Antwan Wilson testified similarly at the 2017 DCPS Budget Oversight Hearing, stating that DCPS must “leverage” at-risk funds for all students to ensure that art teachers are equally provided across all DCPS schools.

This combination of a centralized process, minimal guidance, and a culture that accepted funding inequities led to an environment in which millions of dollars in supplemental funds were systematically withheld from schools with some of the greatest needs.

Schools with more at-risk students received less base funding for related arts teachers and the majority of at-risk funds budgeted for these staff were misused.

Overall, 33 out of 64 standalone elementary schools, with an average projected at-risk enrollment of 63 percent, were required to use at-risk funds to meet CSM staffing requirements, while 31 other schools with an average projected at-risk enrollment of 33 percent were fully funded or over-funded for the same requirements. As shown in Figure 9, schools with the lowest concentration of at-risk students had the most required related arts positions funded with base funds, while schools with the highest concentration of at-risk students had the fewest positions funded with base funds. Overall, just 77 percent of required related arts positions were funded with base funding while the rest were funded with at-risk funds.

Figure 9: FY 2018 DCPS Elementary School Funding for Related Arts Staff as a Percentage of CSM Formula Funds by At-Risk Concentration



Source: DCPS Submitted Budgets, Fiscal Year 2018

For example, Savoy Elementary School and Hyde-Addison Elementary School are very similar schools in terms of overall enrollment. Savoy was projected to have 334 students and Hyde-Addison was projected to have 335 students in school-year 2017-18. However, the characteristics of the two student populations are quite different. Seventy-eight percent of Savoy’s students are considered at-risk, 15 percent represent students with disabilities, and

99 percent are African American. Savoy Elementary is in Ward 8. In contrast, 12 percent of Hyde Addison’s students are considered at-risk, 8 percent are students with disabilities, and 44 percent are African American. Hyde-Addison is in Ward 2 but was temporarily located in Ward 1 for the 2017-18 school year. Savoy was budgeted for 1.5 related arts positions while Hyde-Addison was correctly given funding for all 3 related arts teachers. DCPS chose to provide a budget to Savoy that used at-risk funds to pay for the unfunded, but nonetheless required, related arts teacher positions.

Figure 10: FY 2018 DCPS Elementary School Funding for Related Arts Staff as a Percentage of CSM Formula Funds by At-Risk Concentration

At-Risk Concentration	CSM Formula Related Arts Staff	CSM Funded Related Arts Staff	At-Risk Funded RA Staff	CSM Funded Percentage	At-Risk Funded Percentage
80%+ at-risk count = 14	48.0	28.0	24.0	58%	50%
60-79% at-risk count = 14	46.5	30.0	18.5	65%	40%
40-59% at-risk count = 15	56.5	42.3	17.2	75%	30%
20-39% at-risk count = 6	22.5	17.7	4.8	79%	21%
<20% at-risk count = 15	60.5	61.1	0.7	101%	1%
Total count = 64	234.0	179.0	65.2	77%	28%

Source: DCPS Submitted Budgets, Fiscal Year 2018

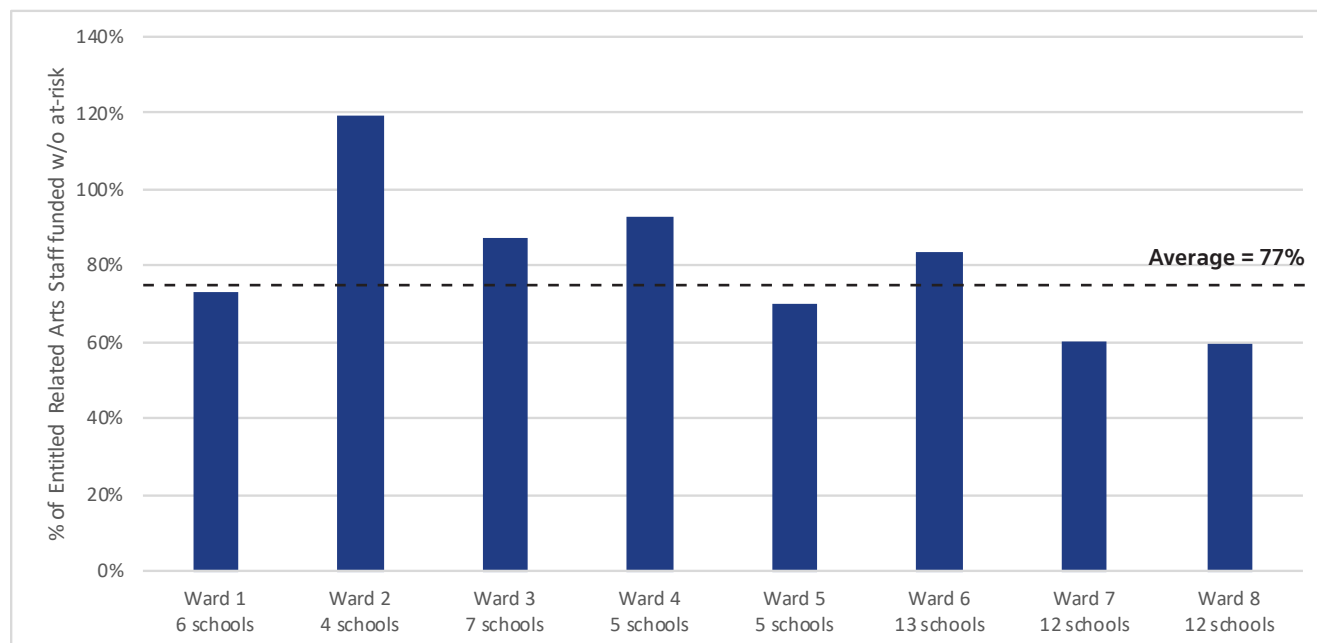
There are many more examples. The School-Within-School at Goding (SWS) in Ward 6 had a total budgeted enrollment of 298 students, 23 (8 percent) of whom were projected to be at-risk, or 8 percent. Houston Elementary School, in Ward 7, had a total budgeted enrollment of 294 students, 236 of whom were projected to be at-risk, or 80 percent. Both schools were required to have 3 related arts teachers according to the CSM. SWS received funding for 4.25 related arts staff and Houston received funding for only half of one position. Houston was forced to spend at-risk funds to make up the difference in required staff. In this case, a school with 236 at-risk students received substantially less base funding than a school with only 23 at-risk students.

The overarching trend shows that CSM formula funds allocated for required related arts staffing decreases as the concentration of at-risk students increases with notable variation at the school level. It does not appear to be the case that DCPS used a specific formula to determine how CSM formula funds were allocated. Instead, schools with similar total enrollment and total number of at-risk students received different CSM formula fund allocations to meet the same requirement.

Wards 5, 7, and 8, those serving the highest percentage of students considered at-risk, received the lowest levels of CSM formula funding for related arts teachers.

Ward 2 elementary schools, on average serving 25 percent of students considered to be at-risk, received 119 percent of what the CSM said they should receive, with all schools budgeted at least a half position more than required, without the use of at-risk funding.

Figure 11: Percentage of Elementary School Related Arts Staff Funded with CSM Formula Funds by Ward, School-year 2017-18



Source: DCPS Submitted Budgets, Fiscal Year 2018

ODCA found significant evidence of misuse of at-risk funds budgeted for social workers and psychologists, particularly in schools with high concentrations of at-risk students.

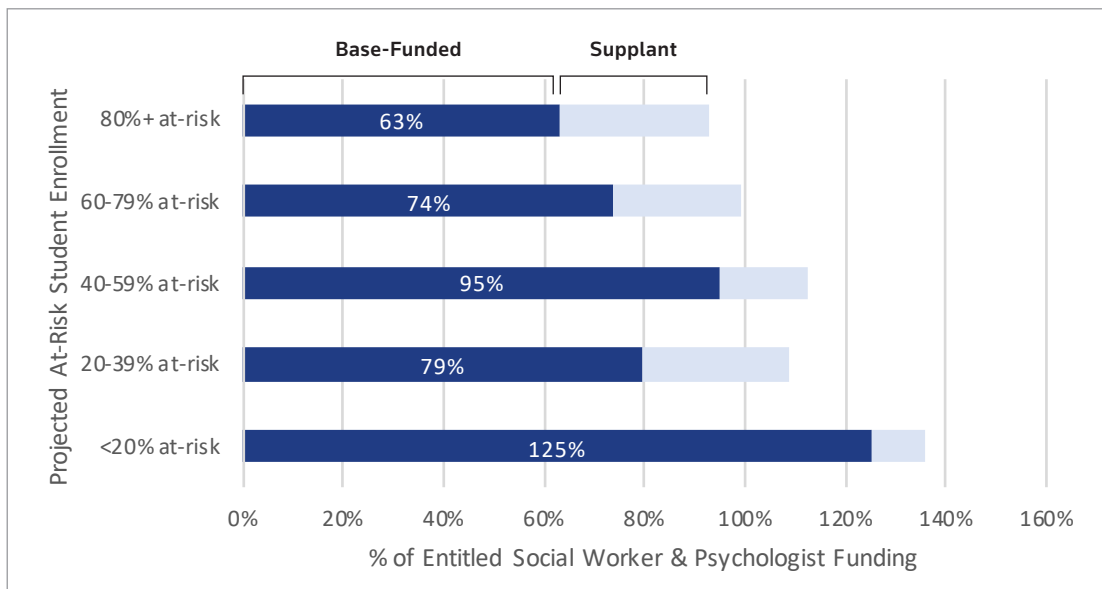
The combined total of social workers and psychologist positions was the second highest use of at-risk funding in FY 2018, totaling 59 at-risk funded positions⁵⁵ (34 psychologists, 25 social workers) at 56 schools for a total of \$5,862,600.76 (12 percent of DCPS’s total at-risk budget).

ODCA again found significant evidence of supplanted at-risk funding, particularly in schools with high concentrations of at-risk students. Specifically, 23 schools with the largest projected concentrations of at-risk students (> 80 percent), received funding for only 63 percent of required social worker and psychologist positions while 19 schools with the lowest projected concentrations of at-risk students (< 20 percent) received funding for 125 percent of their required positions.

⁵⁵ Analysis excludes Ron Brown College Preparatory High School and MacFarland Middle School which were not part of the formula-driven allocations in FY18. RBPHS’s one psychologist was paid for using at-risk funds.

Overall, DCPS included base funding for 80 percent of what its formula deemed were required social worker and psychologist positions. The 59 at-risk budgeted positions brought some schools up to 100 percent of their formula-driven entitlement, but some schools—most notably schools projected to enroll 80 percent or more at-risk—were still below their needs, even when including their at-risk funded positions.

Figure 12: FY 2018 DCPS Funding for CSM Social Worker & Psychologist Positions by At-Risk Concentration



Source: DCPS Submitted Budgets, Fiscal Year 2018

Figure 13: FY 2018 DCPS Funding for Social Worker and Psychologist Positions as a Percentage of CSM Formula Output by At-Risk Concentration

At-Risk Concentration	% Formula Included in Base	% Formula w/At-Risk \$	Base Funded	At-Risk Funded	Formula-Driven Entitlement
<20% at-risk <i>(19 schools)</i>	125%	11%	30.9	2.6	24.6
20–39% at-risk <i>(12 schools)</i>	79%	29%	19.4	7.1	24.4
40–59% at-risk <i>(23 schools)</i>	95%	18%	40.3	7.5	42.4

At-Risk Concentration	% Formula Included in Base	% Formula w/At-Risk \$	Base Funded	At-Risk Funded	Formula-Driven Entitlement
60–79% at-risk <i>(29 schools)</i>	74%	25%	55.5	19.0	75.0
80%+ at-risk <i>(23 schools)</i>	63%	30%	48.3	22.8	76.4
Average <i>(106 schools)</i>	80%	24%	194.3	59.0	242.8

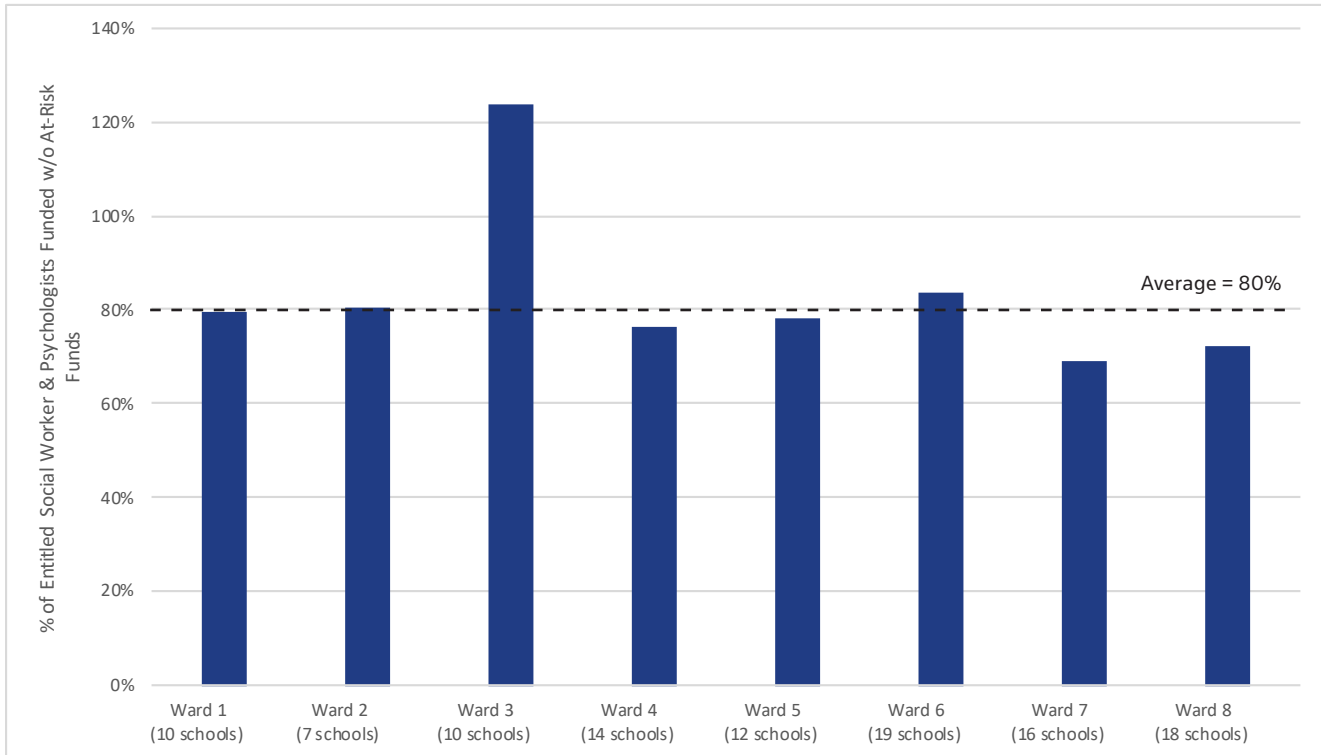
Source: DCPS Submitted Budgets, Fiscal Year 2018

As shown above, DCPS has relied on at-risk money to fund its school-based social workers and psychologists. What has not previously been clear is the pattern of supplanted at-risk funding within some schools. The following section analyzes the allocation of funds for social workers and psychologists across various demographic and geographic factors, including Ward, grade levels served, concentration of at-risk and quantity of behavioral support services (BSS) required to fulfill student IEPs.

Only Ward 3 received enough base funding to cover formula-driven social worker and psychologist need.

Figure 14 shows the allocation of social worker and psychologist positions within DCPS by Ward. In aggregate, schools in all Wards but one (Ward 3) received fewer base-funded social workers and psychologists than called for in the CSM. At-risk funding provided some supplementary funding, but most at-risk funds supplanted what should have been provided with CSM formula funds.

Figure 14: Base Funded Social Worker and Psychologist FTEs by Ward, FY 2018



Source: DCPS Submitted Budgets, Fiscal Year 2018

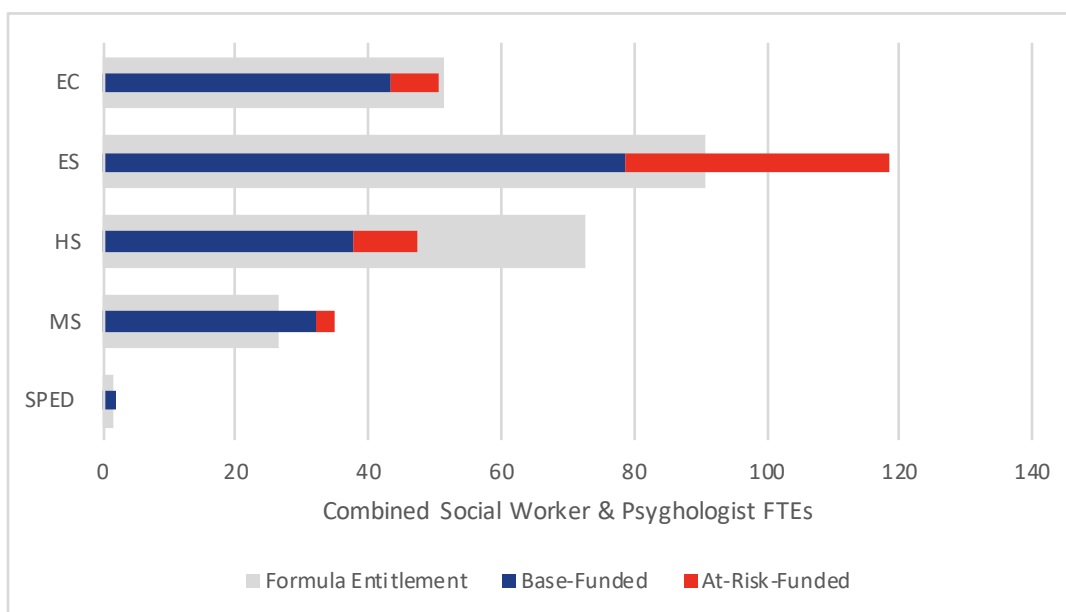
DCPS misused nearly all at-risk funds budgeted for social workers and psychologists in high schools and dramatically underfunded high school social-emotional support positions.

As shown in Figure 15 each grade band also received varying levels of formula-driven funding. The 64 elementary schools were funded at 87 percent of their need, the 11 standalone middle schools received 122 percent and education campuses received 85 percent of their need. Finally, DCPS dramatically underfunded the needs of most of its high schools, providing base funding for only 52 percent of what the CSM formula indicated were needed.

The contrasts between budgeting at Anacostia High School and Alice Deal Middle School help illustrate the larger pattern. Anacostia High School, located in Ward 8, was projected to enroll 426 students in school-year 2017-18, 94 percent of which were considered at-risk. To meet the mental health needs of its students, DCPS’s internal formula said Anacostia needed 7.9 social workers and 3.4 psychologists (11.3 FTEs in total), but the Central Office provided funding for only 4.0 social workers and 2.0 psychologists (6.0 FTEs in total) including 1.7 psychologists paid for using at-risk funds. Deal Middle School, located in Ward 3, was projected to enroll 1,532 students in school-year 2017-18, 8 percent of whom were considered at-risk. According to the CSM formula, Deal needed 1.8 social workers and 1.5 psychologists (3.3 FTEs in total), but Central Office provided funding for 3.0 social workers and 2.0 psychologists (5.0 FTEs combined) without the use of at-risk funds. Despite substantially higher need for mental health support services, Anacostia High received fewer base funds for social workers and psychologists than Deal.

When considering these differences, it is important to remember that the formula used to allocate social workers and psychologists is largely comprised of IEP-mandated needs. Therefore, to the extent schools are allocated social worker and psychologist staffing beyond their formula need reflects the likely extra capacity they will have for responding to unplanned trauma needs, whole school mental health needs, and any other services provided beyond IEP requirements.

Figure 15: Budgeted Social Worker and Psychologist FTEs by School Type, FY 2018



Source: DCPS Submitted Budgets, Fiscal Year 2018

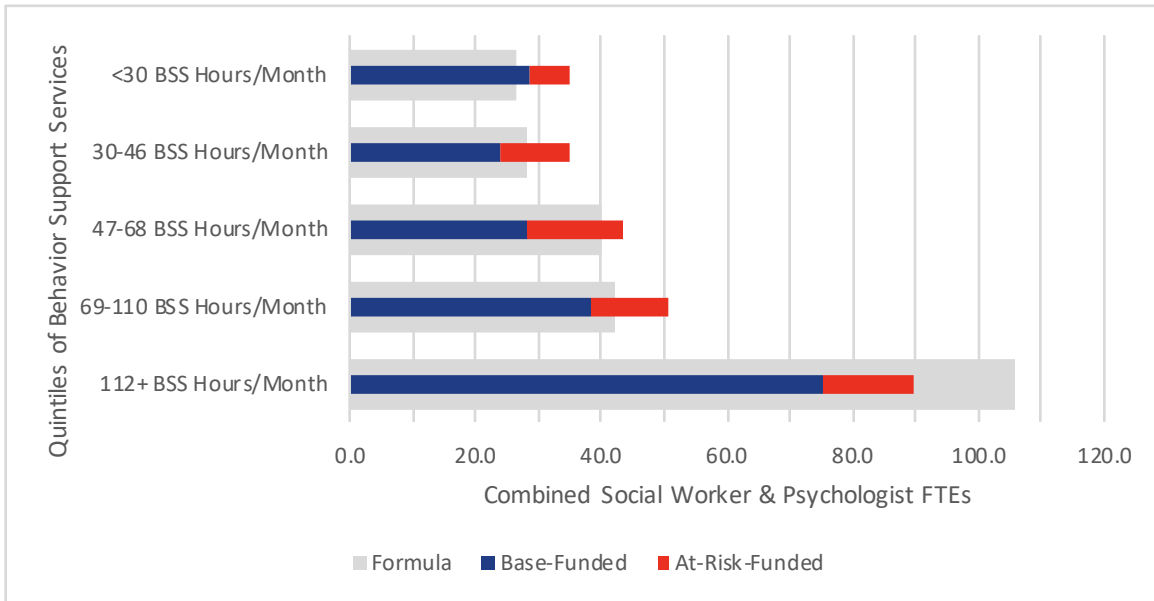
DCPS shortchanged funding for schools with the most required behavioral support service hours.

Because DCPS’ formula allocating social workers and psychologists is need-based, higher formula allocations result from higher need, reflecting an equity framework driving the formula and inputs. Unfortunately, after adjustments, the underlying need-based allocations are almost completely lost.

More specifically, ODCA ranked each of the 106 DCPS schools in this analysis based on the number of behavioral support services (BSS) hours required by student IEPs from least to most required and sorted them into quintiles. Schools in the first quintile required, on average, fewer than 20 prescribed BSS hours per school per month. On the other end, schools in the fifth quintile required an average of 215 BSS hours per school per month, with some requiring more than 30 BSS hours per month.

Again, the data show that DCPS shortchanged the schools with the most need, specifically its schools with the most cumulative BSS hours. For example, H.D. Woodson High School was projected to need over 350 BSS hours per month, requiring the services of 7.2 combined social workers and psychologists. Instead of fully funding this need, DCPS adjusted Woodson’s allocation down to 5.0 FTEs and did not use at-risk funding to fill in the shortfall.

Figure 16: Budgeted Social Worker and Psychologist FTEs by Behavior Support Services (BSS), FY 2018



Source: DCPS Submitted Budgets, Fiscal Year 2018

DCPS adjusts its base funding for social worker and psychologist positions downward in most cases and shortchanges high schools.

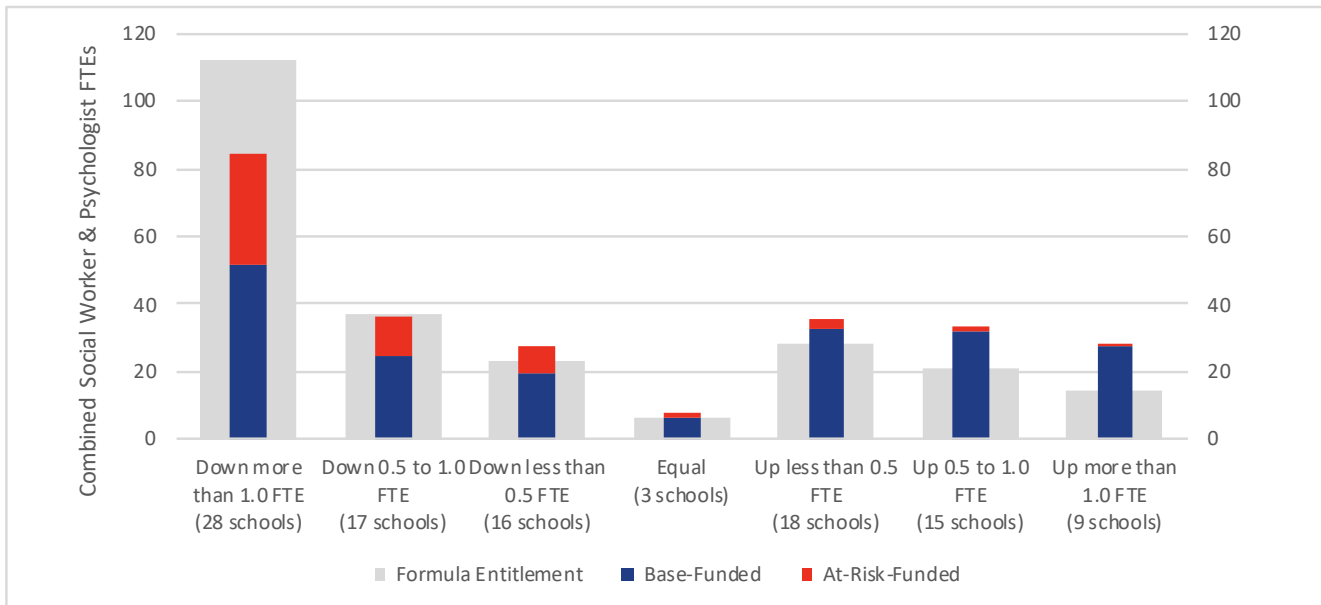
As discussed above, DCPS adjusts each school’s formula allocation of social workers and psychologists “based on other qualitative knowledge that mental health program managers, [instructional] superintendents, and others know about the school.”⁵⁶ ODCA found wide variation in the magnitude of the adjustments, particularly in schools with high need for social workers and psychologists.

Figure 17 shows the 106 schools used in this portion of the analysis by the magnitude of the adjustment. Twenty-eight schools with an average CSM formula allocation of 4.0 combined social worker and psychologist positions had their base funding adjusted down an average of -2.16 FTEs. At-risk funding was used to fund an average of 1.2 social workers and psychologists at these schools, but cumulatively, their submitted budgets were still short of their overall need for mental health support services based on the CSM formula. This analysis shows a clear pattern of supplanting at-risk funding among schools with the most acute needs.

Conversely, nine schools with an average CSM formula need for 1.6 combined school-level mental health positions had their base allocations increased by an average of 1.4 FTEs. These increases above the formula requirements were not funded with at-risk dollars. Finally, only three schools from our sample of 106 received the exact allocation based on need while 37 schools received an adjustment of more than 1 FTE.

⁵⁶ Email exchange with DCPS Director of School Funding, April 10, 2019.

Figure 17: DCPS Adjustments to Budgeted Combined Social Worker and Psychologist, FY 2018



Source: DCPS Submitted Budgets, Fiscal Year 2018

DCPS’s adjustments systematically shortchange its comprehensive high schools. As shown by this review, all DCPS high schools received less than the cumulative total required by their students’ IEPs and several high schools received base funding far below what the CSM formula indicated was required.

When DCPS ended its extended-year program in FY 2020, at-risk funds were budgeted to pay for 65 positions that were formerly paid for with base funds.

In FY 2018, DCPS budgeted most of the at-risk funding (76 percent) at its extended-year schools toward meeting the costs of providing additional instructional days in each school’s calendar. Each school was projected to enroll more than 50 percent at-risk students, and so could justifiably use at-risk funding on school wide programming interventions, such as extended-year. Notably, because extended-year is a supplementary investment made to specific schools, DCPS largely followed its requirements to provide at-risk funding as a supplement to base staffing funds.

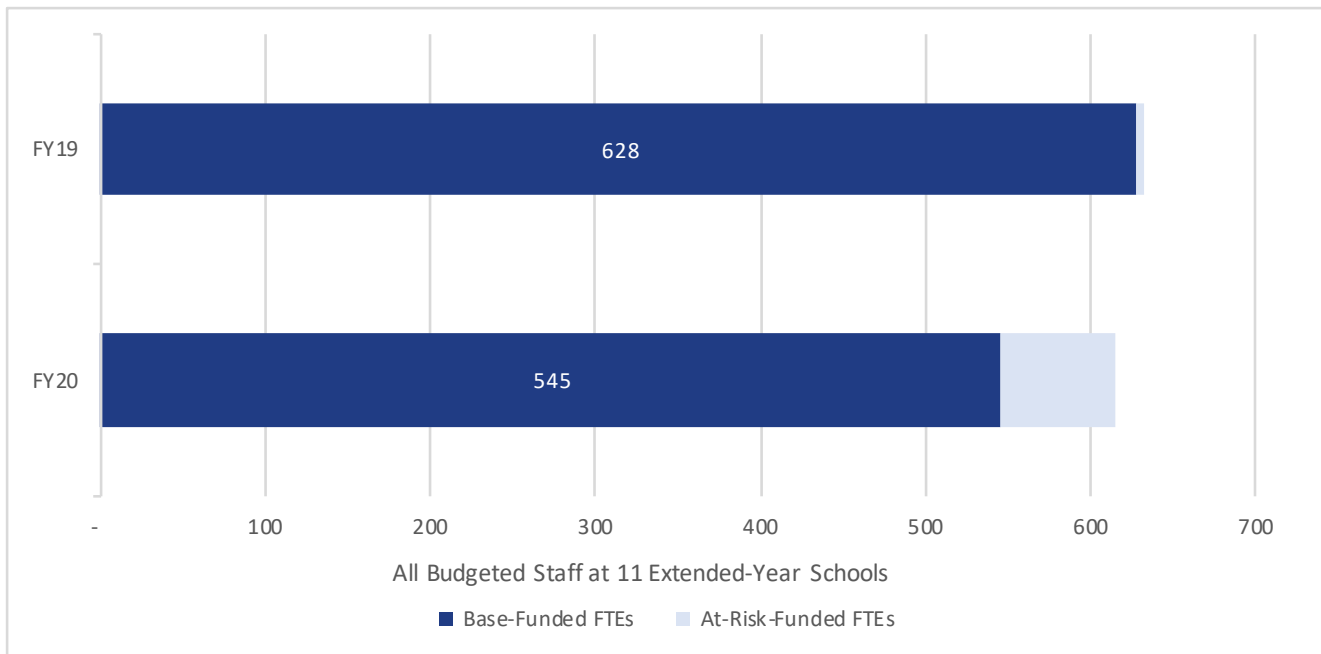
The significant investment in extended-year programming, appears to have shielded the extended-year schools from the misuse of at-risk funds seen at other schools with concentrations of at-risk students. For example, of the seven elementary schools with extended school years in school year 2017-18, only one (Hendley) was forced to use at-risk funding for CSM-required related arts teachers. Similarly, only one of the 11 extended-year schools (Randle Highlands) used at-risk funding on either a CSM-required social worker or psychologist, and even then, the school only used \$32,479 of its \$414,518.01 at-risk funding total.

DCPS recently announced that it would be ending its extended-year program in schoolyear 2019-20. The announcement cited no formal research but said, “Data suggests that the current extended-year model has not

resulted in significant academic gains and has created attendance challenges for students.”⁵⁷

As noted above, 76 percent of FY 2018 extended-year schools’ at-risk funds supported higher salaries and larger supplies budgets at participating schools. With the end of the initiative in FY 2020, most at-risk funds are budgeted for services and positions that had been paid for in FY 2019 with base funds. In total, the 11 DCPS extended-year schools have 65 more positions budgeted with at-risk funding in FY 2020 than in FY 2019 (a 1,300 percent increase) despite a modest 7 percent increase in at-risk funding. Further, as shown in Figure 18 on the following page, the extended-year schools saw their base staff budgets reduced from 628 in FY 2019 to 545 in FY 2020, a net staff reduction of 83 FTEs across 11 schools.⁵⁸

Figure 18: FTE Funding at 11 DCPS Extended Year Schools, FY 2019 Approved vs. FY 2020 Submitted



Source: Council Budget Office Dashboard; DCPS Submitted Budgets, Fiscal Years 2019-20

57 “DC Public Schools Promotes Equity and Excellence with School Budget Proposals and Investments for Fiscal Year 2020,” Accessed May 15, 2019 <<https://dcps.dc.gov/release/dc-public-schools-promotes-equity-and-excellence-school-budget-proposals-and-investments>.

58 Council Budget Office, “FY2020 DCPS School-level Budgets: FY20 Proposed (Mayoral Submission) vs FY19 Approved Dashboard,” accessed May 20, 2019: <https://www.dccouncilbudget.com/schoollevel-budgets-fy20-proposed-mayoral-budget-vs-fy19-approved-budget>.

Recommendations

1. DCPS should establish transparent base funding for each school tied to enrollment and grade level. The annual budget process should use a specific and transparent methodology so that school communities are informed on both the method and the results.
2. DCPS should publish each school's base funding and supplemental at-risk allocations so principals and LSATs can identify what is base funding and what is supplemental.
3. DCPS should establish internal controls for any adjustments to base funding including policies and procedures for allocating at-risk funds.
4. The Council should amend D.C. Code to strengthen at-risk provisions on "supplement not supplant" and apply these provisions to all public schools in D.C. to aid in its oversight of compliance with the at-risk funding requirements.

The District has spent more than \$450 million in at-risk funds without a measurable and consistent strategy.

Over five budget cycles (FY 2015-2019) approximately \$450 million in at-risk funding has been allocated to District public schools—\$261 million to DCPS and \$194 million to charter schools. Our second objective was to track the uses of these dollars in District schools over time to investigate whether a measurable strategy for their use was in place. While some uses may be better than others at improving academic outcomes, measuring and determining impact remains elusive until funds are fulfilling supplemental legislative intent. Nonetheless, there is no evidence of a consistent strategy or plan for these funds within any LEA.

Currently, D.C. Code does not provide substantial guidance or legislative specificity around the use of at-risk funds. This lack of guidance likely contributes to an environment in which LEAs are not expected to articulate an evidence-based plan for these dollars. In addition, D.C. Code is completely silent with regard to charter schools' use of at-risk funds – it does not say, for example, that they must be used within the fiscal year, or that they be supplemental. Again, this lack of legislative specificity likely contributes to unclear expectations regarding plans for use.

In addition, there have been multiple leadership transitions in the Executive branch since the at-risk funds were first allocated in FY 2015—including the Mayor, the Deputy Mayor for Education, and the Chancellor of DCPS. For example, in the past five years there have been three chancellors and two interim chancellors for DCPS. PSCB has had the most consistent leadership throughout this time.

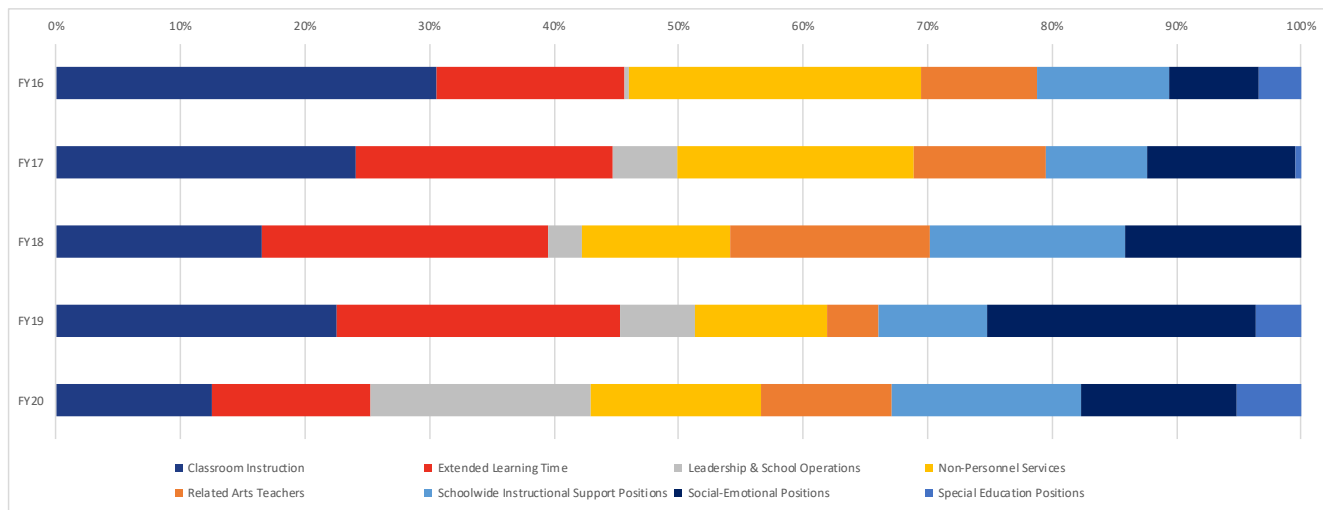
Finally, these funds are relatively new to the public education landscape. It may take large bureaucracies or systems of LEAs more than five years to develop robust and strategic plans guiding the use of funds targeted to do an inherently complex task. In fact, the DCPS budget director communicated that while they have always prioritized "substantive compliance with the law" since the funding was first received, "it has taken some time for the systems to catch up with the legislation."

DCPS has had no consistent strategy for using at-risk funds to improve academic achievement.

Figure 19 shows the various proposed uses of at-risk funding in DCPS schools from school-year 2015-16 (FY16) to school-year 2019-20 (FY20). Over the five-year period, classroom instruction has been the most popular use of at-risk funds in DCPS, equivalent to 21 percent of school-level at-risk funded items. Leadership and school operations is the fastest growing category of at-risk spending in DCPS, moving from less than 1 percent of all at-risk funding

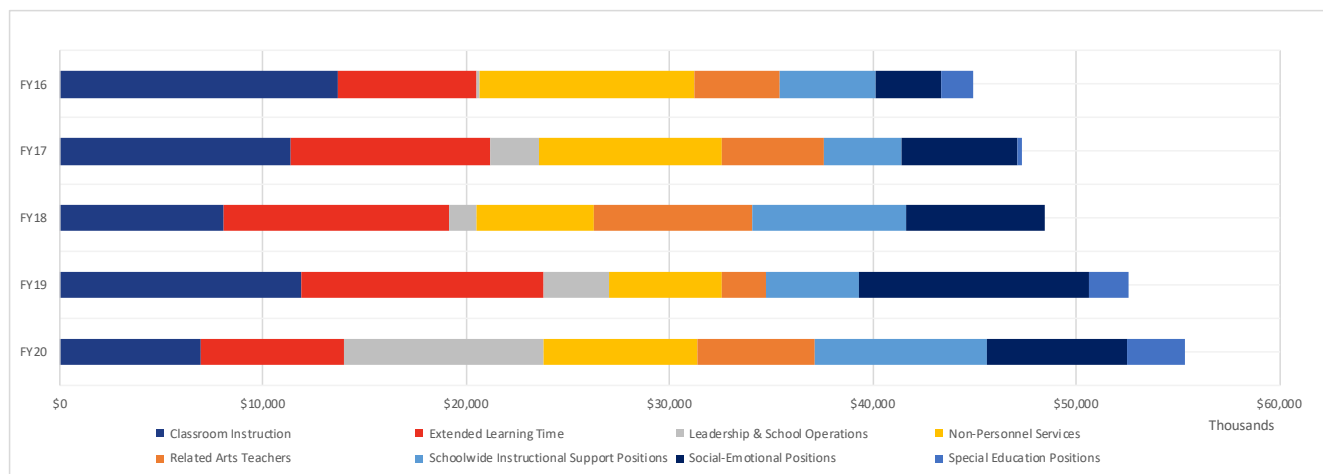
in FY16 to become the largest category in FY20, representing nearly 18 percent of all at-risk funded items. Finally, following the end of its extended-year program, investments in other extended learning time programs have fallen from 23 percent of at-risk spending in FY19 to 13 percent in FY20. It is worth repeating that ODCA did not analyze whether all uses of at-risk funds in FY16-20 were supplementary to base school-level budgets.

Figure 19: Categorized Uses of At-Risk Funding in DCPS Submitted Budgets as a Percentage of FY 2016 to FY 2020 Totals



Source: DCPS Submitted Budgets, Fiscal Years 2016-20

Figure 20: Categorized Uses of At-Risk Funding in DCPS Submitted Budgets, FY 2016 to FY 2020

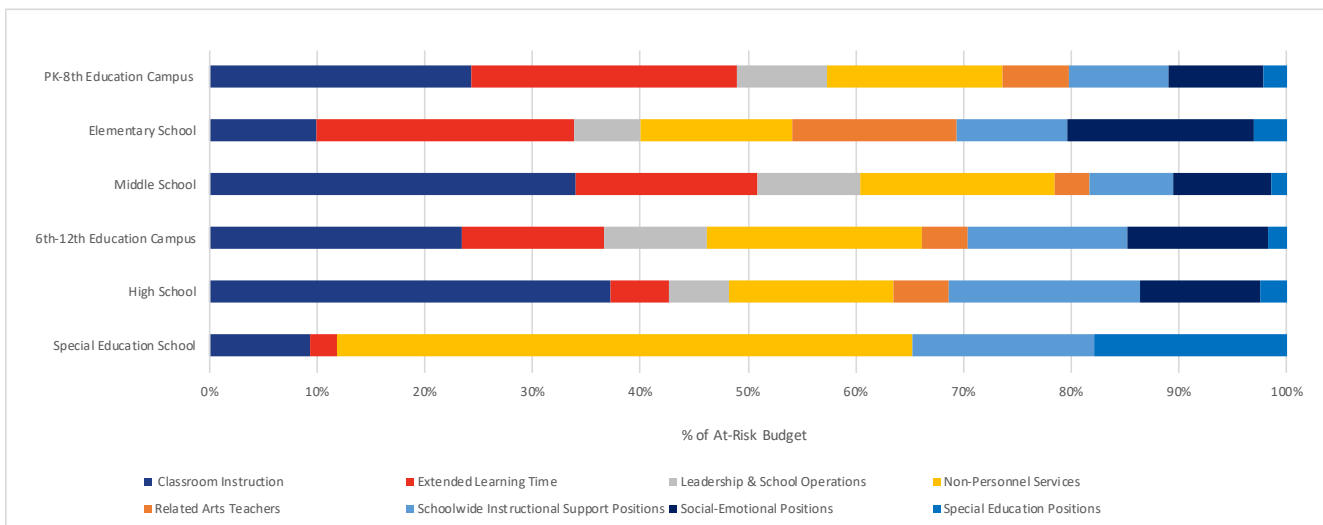


Source: DCPS Submitted Budgets, Fiscal Years 2016-20

DCPS budgets at-risk funds differently by grade band and school type.

Some trends emerge when isolating schools by type and grade band. Figure 21 shows that DCPS used over 15 percent of elementary school at-risk funds on related arts teachers and only 10 percent on classroom instruction—a much lower rate than for its other school types. In contrast, DCPS used more at-risk funds on classroom instructional personnel at middle, 6th-12th education campuses, and high schools. However, while the patterns are slightly different across grade bands this breakdown does not seem to explain enough of the variation in fund use to consider this a measurable strategy.

Figure 21: DCPS Use of At-Risk Funds by School Type, FYs 2016-2020

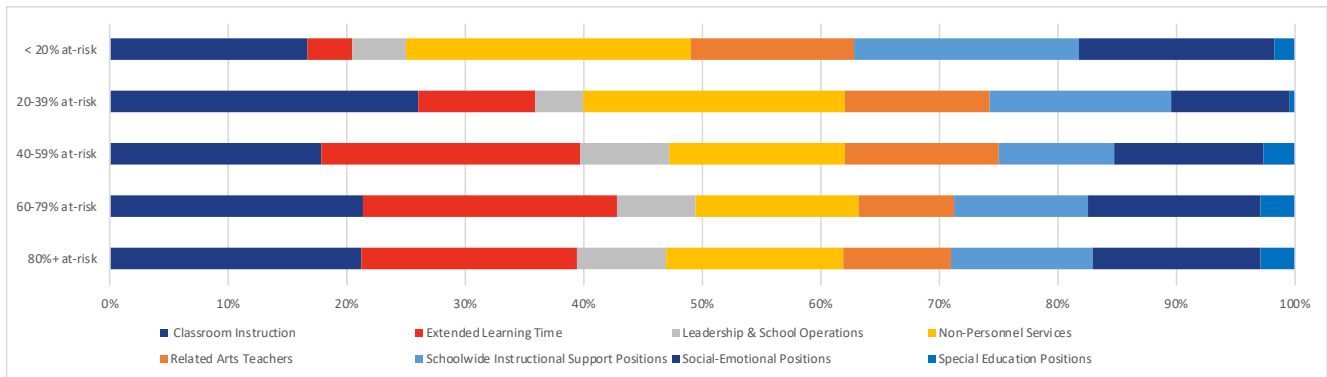


Source: DCPS Submitted Budgets, FYs 2016-2020

DCPS budgets at-risk funds differently when comparing the levels of projected at-risk concentration.

Further patterns emerge when reviewing the use of at-risk funds by at-risk concentration. Figure 22 shows that for schools with moderately small at-risk populations (20 percent to 39 percent), DCPS was most likely to budget at-risk funds towards classroom instructional staff. DCPS often used at-risk funds to purchase non-personal services at its schools with the smallest concentration of at-risk students (<20 percent). However, these low at-risk student concentrations also represent less at-risk funds, thereby continuing to leave the bulk of the variation in budgeted uses unexplained.

Figure 22: DCPS Use of At-Risk Funds by Projected At-Risk Concentration, FYs 2016-2020



Source: DCPS Submitted Budgets, Fiscal Years 2016-20

The Use of At-Risk Funding in DC’s Charter Schools

The District of Columbia School Reform Act of 1995 gave each charter local education agency (LEA) “exclusive control over its expenditures, administration, personnel, and instructional methods.”⁵⁹ Additionally, the Fair Student and School-Based Budgeting Act of 2013 made restrictions on how DCPS can use at-risk funds but did not extend the same limitations to charter schools.⁶⁰

To analyze the use of at-risk funds in the charter sector, ODCA first identified which LEAs were eligible to receive at-risk funds, then reviewed each year’s PCSB survey to see if all eligible LEAs responded. Next, ODCA multiplied each year’s at-risk weight against each LEA’s audited at-risk enrollment to derive how much at-risk funding each eligible LEA received. Last, ODCA reviewed the qualitative survey responses from each responsive LEA to explore trends in at-risk funds usage.

Responsive eligible charter LEAs reported a wide variety of uses of at-risk funds, and most appear consistent with legislative intent, though responses are unverified.

LEAs uses of at-risk funding included summer school, academic interventions and enrichment activities. Some charters used at-risk funds to replace a previous allocation for summer school and reported early struggles with the transition in funding streams. Charter schools with higher percentages of at-risk students, like DC Prep and Cesar Chavez, reported using their at-risk funds for supplemental services for students most in need of additional attention. Schools with relatively small at-risk populations, like Latin American Montessori Bilingual (LAMB) and Washington Yu Ying, report uses like scholarships for field trips and after-school programming.

Overall, DC’s charter schools report uses of at-risk funds consistent with the legislative goal of improving academic achievement. However, ODCA is unable to verify self-reported uses of at-risk funds as no line-item budgets are available for comparison.

59 D.C. Code § 38-1802.04(c)(3)(A).

60 See D.C. Code § 38.2907.01 for description of DCPS use of funds.

PCSB’s annual survey asks a single question and fails to collect accurate or comprehensive information on the use of at-risk funds in the charter sector.

PCSB collects data on the use of at-risk funding in an annual, open-ended survey of eligible charter LEAs, i.e., those with PK-12th grade students because students enrolled in alternative or adult programs are not eligible for at-risk funding.⁶¹

Notably, there was no FY 2015 reporting requirement for charter schools on the use of at-risk funding.⁶² The FY 2016 and FY 2017 Budget Support Acts required PCSB to report on the current school-year’s use of at-risk funds including a breakdown of the intended uses of the funds and a description of the programs, initiatives, and enrichment activities supported with at-risk funding.⁶³ Unfortunately, PCSB used its FY 2017 report to ask charter LEAs about the previous school-year (2015-16) again, so there are no survey responses available regarding the use of at-risk funds for school year 2016-17.⁶⁴ Finally, the Council received reports on the use of at-risk funds along with LEA-level spend plans for school years 2017-18 and 2018-19 through PCSB’s FY 2017 and FY 2018 performance oversight responses.

PCSB’s data collection methods, though simplified for LEA compliance, limit comprehensive analysis of at-risk funding in charter schools. PCSB says precise tracking of at-risk funds would be “difficult and costly”⁶⁵ and so limits its inquiries to the annual survey. Not all charter LEAs receiving at-risk funding respond to each year’s survey. Figure 23 shows that, across four reports, only 69 percent of eligible charter LEAs responded, and, despite recent improvements, PCSB still lacks 100 percent participation.

Figure 23: Survey Response Rate to PCSB At-Risk Survey Among Eligible Charter LEAs, FY 2015 to FY 2019

Fiscal Year	Total Charter LEAs	Charter LEAs Eligible to Receive At-Risk Funds	Responsive Eligible Charter LEAs	Response Rate of Eligible Charter LEAs
FY 2015	No reporting requirements on the use of at-risk funds in charter schools			
FY 2016	62	55	26 ⁶⁶	47%
FY 2017 ⁶⁷	62 (FY16)	55 (FY16)	36	65%
FY 2018	66	59	39	66%

61 D.C. Code § 38.2905.01(c).

62 D.C. Act 20-424, Sec. 10006.

63 See Title IV, Subtitle I, Section 4083 of the “Fiscal Year 2016 Budget Support Act of 2015,” Law Number L21-0036, effective October 22, 2015, and Title IV, Subtitle O, Section 4143 of the “Fiscal Year 2017 Budget Support Act of 2016.”

64 PCSB, “Report on the use of per pupil at-risk funding in DC public charter schools,” page 7, published October 1, 2016.

65 PCSB, “Report on the use of per pupil at-risk funding in DC public charter schools,” SY 17-18.

66 Washington Latin PCS responded twice to the 2015 PCSB survey, totaling 27 responses among 26 total LEAs.

67 PCSB’s fiscal year 2017 survey question asked charter LEAs to “include a description of how your LEA has spent or plans to spend per pupil at-risk funds for SY15-16, particularly any programs, initiatives or enrichment activities the at-risk funds have supported or will support.”

Fiscal Year	Total Charter LEAs	Charter LEAs Eligible to Receive At-Risk Funds	Responsive Eligible Charter LEAs	Response Rate of Eligible Charter LEAs
FY 2019	66	58	55	95%
Total/Average	256	227	156	69%

Source: PCSB At-Risk Funding Reports

Further, even with 100 percent reporting, the data collected through a one-question survey does not provide enough information to track the specific uses of at-risk funding. If the Council is interested in tracking whether at-risk funds are being used “to support the academic achievement of at-risk students,” a more detailed accounting is needed. The addition of LEA spending plans has improved the level of detail, but LEA estimated costs still often do not align with at-risk revenues signaling problems with data validity.

For example, in fiscal year 2018, KIPP DC received \$7,140,924 in at-risk funding,⁶⁸ but reported \$9,894,700 in estimated total costs for programs and initiatives supported by at-risk funds. As shown in Figure 24, PCSB’s four reports only account 53 percent of at-risk funds received over a five-year period due to duplicated requests for the use of at-risk funding in school-year 2015-16 (FY 2016).

Figure 24: Percentage of At-Risk Funding Accounted for in Responses to PCSB At-Risk Survey, FY 2015-2019

Fiscal Year	Total At-Risk Funds to Charter LEAs	At-Risk Funds to Responsive LEAs	At-Risk Funds to Non-Responsive LEAs	% At-Risk Funds in Responsive LEAs
FY 2015*	\$34,781,670	No PCSB survey	\$34,781,670	0%
FY 2016	\$35,415,135	\$29,332,856	\$6,082,27969	83%
FY 2017**	\$40,176,964	No PCSB survey	\$40,176,964	0%
FY 2018	\$42,522,080	\$33,413,415	\$9,108,665	79%
FY 2019	\$42,075,071	\$40,936,207	\$1,138,864	97%
Total	\$194,970,920	\$103,682,478	\$91,288,442	53%

Source: PCSB At-Risk Funding Reports

* There was no PCSB survey on the use of at-risk funding in FY 2015.

**PCSB’s FY 2017 survey asked about FY16.

68 PCSB, “Report on the use of per pupil at-risk funding in DC public charter schools,” SY 17-18, page 29; FY 2018 funding amount reported in Fiscal Year 2019 report, page 3.

69 Fourteen of 55 eligible LEAs were responsive to neither the fiscal year 2017 survey about school-year 2015-16 nor the fiscal year 2016 survey about school-year 2015-16. Twenty eligible LEAs were responsive to one survey but not the other and 21 LEAs responded to both surveys.

Recommendations

5. The District should evaluate and continuously improve its at-risk funded programs. In partnership with the forthcoming Research Practice Partnership (RPP),⁷⁰ DME should initiate formal research on the context and impact of its at-risk funded initiatives, using rigorous quantitative and qualitative methods.
6. The Council should require consistent reporting of at-risk spending across all public schools.

⁷⁰ D.C. Law 22-268, "District of Columbia Education Research Practice Partnership Establishment and Audit Act of 2018," effective March 28, 2019.

Conclusion

It is not news that DCPS has supplanted its base funding with at-risk funds.⁷¹ The disparities identified in this study raise additional questions about how and when and by whom final decisions about use of at-risk funds have been made and what alternative investments might have been made if funds had been allocated differently.

DCPS officials and others have suggested that the misuse of at-risk funds is due to overall budget shortfalls. Our analysis, while limited to the top three uses of at-risk funding in FY 2018, indicates that if there has been a shortfall, its burden was not equitably shared. Thirty-three of DCPS' 64 standalone elementary schools used supplanted at-risk funds to pay for 54 related arts teachers in fiscal year 2018—a cumulative value of \$5.3 million that could have been allocated to supplemental staff and resources for students most in need.⁷²

Similarly, 46 schools used supplanted at-risk funds to pay for 40 social worker and psychologist positions (\$3.9 million) that were due to each based on DCPS's internal formula for schoolwide instructional support staffing. These cuts equate to roughly 100 additional staff members that schools should have had access to under DCPS's CSM. Further, when DCPS ended its extended-year program at 11 schools, although overall staffing was cut by more than 15 positions, at-risk funding was shifted from funding 5.0 FTEs in fiscal year 2019 to funding 70.0 FTEs in fiscal year 2020.

By law, the District's at-risk funding should not supplant other funding. When DCPS pays for basic staff at one school with Formula funds but forces another school to use at-risk funds for the same position the "extra" dollars cease to be extra. Recent increases to the at-risk funding weight have failed to address the practice of inequitable funding.

DCPS has said that its "priority has always been to provide substantive compliance with the law since the funding was first receive[d]" and that "it has taken some time for the systems to catch up with the legislation."⁷³ Fiscal year 2020 is the first year with a formal SOAR budgeting code for at-risk funding, which should improve transparency. In the future, particularly given requirements in the federal Every Student Succeeds Act (ESSA) to publish actual school-level expenses,⁷⁴ DCPS should be expected to improve how it budgets for its schools.

Further, transparent reporting by the charter sector on the use of at-risk funds, would allow for greater cross-sector collaboration and allow parents to track if and how funds are being appropriately used.

Research has shown that supplemental funding, targeted to those in need, can help narrow the achievement gap.⁷⁵ As this analysis has shown, under our current budget rubric, if at-risk funds are not supplemental they will not be equitably dispersed and their impact on the academic outcomes of the District's approximately 40,000 students considered at-risk cannot be measured. The District's at-risk students all deserve equal access to supplemental funds regardless of whether they attend a DCPS or public charter school and the Council should amend D.C. Code to make this access a priority.

71 Stein, Perry. "DC is Misspending Millions of Dollars Intended to Help the City's Poorest Students." April 14, 2018.

72 DCPS Fiscal Year 2018 Budget Guide set the average cost of a teacher at \$97,685 multiplied by 54 teachers.

73 Email exchange with DCPS Director of School Funding, May 22, 2019.

74 § 1111 of the Elementary and Secondary Education Act of 1965, as amended through P.L. 114-95, Every Student Succeeds Act, 20 U.S.C. § 6311.

75 Jackson, C. Kirabo et. al., "Boosting Educational Attainment and Adult Earnings: Does school spending matter after all?", *Education Next* Fall 2015, Vol. 15, No. 4.

Agency Comments

On June 14, 2019, we sent a draft copy of this report to the DCPS and PCSB for review and written comment. DCPCSB responded on June 19, 2019, and DCPS responded on June 21, 2019. Agency comments are included here in their entirety, followed by ODCA's response.



Scott Pearson
Executive Director

June 19, 2019

VIA ELECTRONIC MAIL

Kathy Patterson
Auditor of the District of Columbia
717 14th Street NW, Suite 900
Washington, DC 20005

Dear Ms. Patterson,

Thank you for the opportunity to comment on the draft report from the ODCA, "DC Schools Short-Change At-Risk Students".

Before turning to the report's recommendations, allow me to provide three general observations.

The first is that the title of the report is inflammatory and unfairly tars public charter schools with some of the documented failures of DCPS. Indeed, the report notes that, "Overall, DC's charter schools report uses of at-risk funds consistent with the legislative goal of improving academic achievement." This is hardly consistent with the title of the report. We request that the title be revised to more accurately summarize the state of affairs.

The second is that the report focuses on average charter LEA responses, rather than noting that in the most recent year 95% of eligible LEAs provided responses to our data collection. We continue to improve our data collection processes and fully expect to have 100% responsiveness in our next data collection.

Third, there is a presumption that at-risk reporting for public charter schools, from its inception, had a consistent goal. This reporting has evolved over multiple years and continues to evolve as we learn better what information is helpful for Council and the public and find the least burdensome ways to collect this from charter LEAs. Burden is important as we maximize the amount of all funding going to support students.

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Initially, DC PCSB was asked as a budget reporting requirement to survey schools on how they spend their at-risk funds to determine if the funding was adequate. This was not a requirement of schools and participation was optional. Eventually, Council removed that legislative ask and required us to report on the funding as part our performance oversight questions. We eventually developed a template and worked with schools to complete the form. Based on Council feedback, we were also asked to report on the next fiscal year versus the previous year. To increase LEA participation, we moved the reporting requirement to our compliance calendar, which contains necessary compliance submissions for LEAs, where it lives today. Every year more schools complete the report and provide rich detail about how they spend the funds.

Reporting this information is now a component of our new transparency policy. We hope to continue the report's evolution to increase the understanding of how schools target funds to best support at-risk students as well as students who are vulnerable to becoming classified as at-risk.

I now turn to our comments to your specific recommendations:

- 1) *DCPS should establish transparent base funding for each school tied to enrollment and grade level. The annual budget process should use a specific and transparent methodology so that school communities are informed on both the method and the results.*

No comment on this recommendation.

- 2) *DCPS should publish each school's base funding and supplemental at-risk allocations so principals and LSATs can identify what is base funding and what is supplemental.*

No comment on this recommendation.

- 3) *DCPS should establish internal controls for any adjustments to base funding including policies and procedures for allocating at-risk funds.*

No comment on this recommendation.

- 4) *The Council should amend D.C. Code to strengthen at-risk provisions on "supplement not supplant" and apply these provisions to all public*

schools in D.C. to aid in its oversight of compliance with the at-risk funding requirements.

We object to the recommendation that this apply to public charter schools in DC. As the report notes, public charter schools are guaranteed exclusive control over their expenditures (DC Code § 38-1802.04(c)(3)(A)), and applying “supplement not supplant” requirements would contravene this exclusive control.

- 5) *The District should research and evaluate its at-risk funded programs.*
- a) *In partnership with the forthcoming Research Practice Partnership (RPP), DCPS should initiate formal research on the context and impact of its at-risk funded initiatives, using rigorous quantitative and qualitative methods.*

No comment on this recommendation.

- 6) The Council should require consistent reporting of at-risk spending across all public schools

We object to the recommendation that this apply to public charter schools in DC. Detailed, fund-level accounting of at-risk funds would require significant changes in accounting practices and contributes nothing to improved student performance. The information collected by the DC Public Charter School Board, particularly in the most recent year, is comprehensive and demonstrates that public charter schools are using their at-risk funds in ways consistent with the purpose of the funding. We would be pleased to discuss ways to improve this reporting, but simply requiring uniformity with DCPS is not the best way to achieve this.

Thank you again for the opportunity to comment on this report.

Sincerely yours,



Scott Pearson



June 21, 2019

Kathleen Patterson
District of Columbia Auditor
Office of the District of the Columbia Auditor
717 14th Street, N.W., Suite 900
Washington, DC 20005

Dear Ms. Patterson:

DC Public Schools (DCPS) appreciates having the opportunity to respond to the Office of the District of Columbia Auditor's *DC Schools Short-Change At-Risk Students* draft report dated June 14, 2019.

DCPS remains committed to prioritizing resources for students who need them most and does not "short change" at-risk students as the title of your report suggests. DCPS has consistently prioritized funding for students furthest from opportunity. As an example, in the FY20 budget, schools with over 80% at-risk students receive more than \$5,000 more per pupil than schools with less than 20% at-risk students, on average. There are variations in per-pupil funding based on the number of students with IEPs, English Language Learners and other factors.

Our schools that serve students furthest from opportunity see investments and opportunities beyond our school-based budgets. For example, in FY20 DCPS is expanding its Cluster Support Model, which provides schools with targeted supports through an Instructional Superintendent that works between schools and Central Office. This expansion will include three clusters that will focus specifically on the Anacostia and Ballou feeder patterns to ensure that these schools receive amplified support and attention. These schools will receive community-aligned supports within a smaller cohort.

We have also dedicated \$1.6 million to launch eight "Connected Schools," which will serve as neighborhood hubs of support by providing wraparound services and transforming the way DC agencies work together to break down in-school and out-of-school barriers students and families face. This model will help us to holistically meet the needs of our students, their families, and their communities. These schools will receive support and resources to implement a new school-wide approach for integrating academics, student services, and community engagement to serve the whole child and whole community.

We also want to recognize that at-risk funding is a relatively new component to the overall budget process. D.C. Official Code § 38-2907 requires DCPS to ensure 90% of at-risk funds are directed to school-level budgets, to share annual updates on at-risk spending, and to invest at-risk funds in a way that supplements underlying budgets. Since 2015, DCPS has made steady improvements to how at-risk funds are allocated to schools, with the goal of improving equity and transparency. These improvements include:

- In FY18, we ensured that all schools with an at-risk population received flexible funds to support at-risk spending;



- In FY19, we put systems and structures in place to enhance our ability to account for how each school budgeted its flexible at-risk funds; and,
- In FY20, we built upon these improvements by partnering with the Office of the Chief Financial Officer (OCFO) to establish a budget coding system to track at-risk expenditures.

At the same time, we have shared regular updates on at-risk spending and the categories of spending where we invest, as referenced in your report. We appreciate the points raised on recent at-risk spending and recognize a need to continue to evaluate the way schools receive funding. A thorough equity analysis of school budget models is already underway, and we are committed to engaging the community on a path forward. We will continue to ensure that our students are receiving the resources they need to be successful.

Our goals in exploring a new funding model are to improve budget transparency and equity. DCPS is beginning to evaluate our existing school funding model, the Comprehensive Staffing Model, and may consider a possible shift to a another budget model. We know that any change in funding model can only be successful after robust planning and significant community engagement. I believe that this budgeting reform process will be a critical lever for DCPS' next phase. I also believe it will give us the opportunity to continue to innovate around our support for students furthest from opportunity.

DCPS appreciates this continued conversation and looks forward to building upon the progress we have made in FY20 and beyond. Please see below our response to relevant recommendations.

ODCA Recommendation #1:

DCPS should establish transparent base funding for each school tied to enrollment and grade level. The annual budget process should use a specific and transparent methodology so that school communities are informed on both the method and the results.

DCPS Response:

We agree with recommendation #1. DCPS has already begun some key steps toward developing a more transparent budget process, including research and updates to internal budget analytics. In the next year, DCPS plans to increase transparency by more clearly delineating different funding streams and year-over-year school budget changes. In addition, we are exploring new budget models with the potential to increase equity for students, transparency for communities, and autonomy for our school leaders.

While we know there is still more work to do, this year, DCPS has worked to make the budget process more transparent than ever before. We did that by improving information sharing and introducing new tools to give our families, communities, and stakeholders access to the same information we had.

For FY20 Budget planning, we created a [*Family and Community Guide to the DC Public Schools Budget*](#) to provide additional context on the overall budget development process, including how each school's budget is determined, and what to expect in the budget development process. School communities can now access a [snapshot of their school's Comprehensive Support Plans \(CSP\)](#), which are individualized strategic plans to drive continuous improvement at each school.



ODCA Recommendation #2:

DCPS should publish each school's base funding and supplemental at-risk allocations so principals and LSATs can identify what is base funding and what is supplemental.

DCPS Response:

We agree with recommendation #2. As noted in the draft report, DCPS has made significant changes to how at-risk funds are coded in FY20, which will allow us to track expenditures. Further, we have worked to make our budgeting process more transparent by posting the Comprehensive Staffing Models' components, publicly publishing schools' budgets, and providing a [new Comparison Worksheet](#) delineating changes from schools' initial budget allocations to their submitted budgets. However, as we evaluate a new funding model, we plan to more clearly delineate foundation funding versus supplemental funding or funding provided based on a categorical weight.

As shared above, for the FY21 budget development process, DCPS will increase transparency by sharing school funding allocations by funding source. Currently, school budget allocations do not delineate each fund when allocations are released. By allocating school budgets by fund, principals will be empowered to better understand their schools' local and non-local funding sources, including what activities and personnel are supported through at-risk funding.

ODCA Recommendation #3:

DCPS should establish internal controls for any adjustments to base funding, including policies and procedures for allocating at-risk funds.

DCPS Response:

We agree with recommendation #3. DCPS continues to make improvements in many areas, including more clearly delineating the allocation of funds to schools and enhancing internal controls regarding adjustments to school-based allocations.

As we begin engaging DCPS stakeholders on the potential adoption of a new budget model, designing and implementing appropriate policies and procedures will be an important part of the conversation.

ODCA Recommendation #5:

In partnership with the forthcoming Research Practice Partnership (RPP), DCPS should initiate formal research on the context and impact of its at-risk funded initiatives, using rigorous quantitative and qualitative methods.

DCPS Response:

We partially agree with recommendation #5. DCPS supports any opportunity to learn more about strategies to further our goals of equity and transparency. At the same time, DCPS has started an equity analysis which will include a rigorous internal financial review of funding systems, structures, and their effects at both the central and school level. This financial review will include a review of DCPS' current practices to highlight spending differences across schools, student need, staffing composition and program offerings, among other things. The RPP, when launched, may further elaborate on those efforts.



Recommendations 4 and 6 are not directed to DCPS so we take no position on those recommendations. Further legislative amendments are unnecessary at this time. We are confident in DCPS's continued growth, focus, and execution on a more transparent budgeting process that puts the needs of students furthest from opportunity at the forefront.

Thank you again for your evaluation and for the opportunity to respond to your work.

Sincerely,

Lewis D. Ferebee
Chancellor

ODCA Response to Agency Comments

ODCA appreciates the responses to the draft report provided by DCPS and the PCSB, including that DCPS recognizes “a need to continue to evaluate the way schools receive funding.” We received similar commitments from DCPS to transparency and equity in response to our 2017 report, [Budgeting and Staffing at Eight DCPS Elementary Schools](#), and look forward to tangible improvement in the next budget cycle. One clear way to make progress toward these goals is to implement ODCA’s recommendation to provide principals and LSATs with transparent budget information around sources of funding and their allocation in the initial phase of the budget process. DCPS agrees with Recommendations 1, 2, and 3 citing efforts to improve budget transparency. ODCA appreciates seeing further commitment from DCPS to reform, particularly plans to clearly delineate allocations by funding source and year-over-year budget changes. DCPS should also ensure that each school’s base funding and the amount of funding for FTEs each school is entitled to under the current funding model can be clearly identified.

Our 2018 report, [D.C. Public School Principals Share Challenges, Concerns](#), found that more than seven in 10 responding principals wanted more control over their school’s finances. ODCA agrees with DCPS that with greater transparency, principals “will be empowered to better understand their school’s local and non-local funding sources.” That said, we remain concerned that DCPS’s centralized budgeting process leaves significant room for undocumented adjustments to school-level allocations. In particular, adjusting downward the base funding allocations for schools with higher concentrations of at-risk students should be prevented with clear policies and procedures that preclude the practices we have documented. Therefore, DCPS should publish policies and procedures for adjusting school-level allocations ahead of the FY 2021 budget development process and commit to engage school communities in understanding what they are entitled to under the CSM.

The PCSB objected to Recommendation 4, claiming it would “contravene” charter LEA’s exclusive control over their finances. The law cited by the PCSB, the School Reform Act codified in D.C. Code, was enacted by Congress, and may be amended by the D.C. Council. As the District stated in its Supplemental Brief in the *D.C. Association of Chartered Public Schools, et al. v. District of Columbia* (currently pending in federal district court), citing *District Properties Associates v. District of Columbia*, 743 F.2d 21 (D.C. Cir 1984):

When Congress acts as the local legislature for the District of Columbia and enacts legislation applicable *only* to the District of Columbia and tailored to meet specifically local needs, its enactments should...be treated as local law...

The D.C. Council has appropriately amended the School Reform Act several times and may do so in the future, as we have recommended.

DCPS partially agrees with Recommendation 5, citing an internal equity analysis that is underway. ODCA appreciates DCPS’s commitment to review its funding system and believes an in-house review is necessary but not sufficient for DCPS to maximize the impact of at-risk funding. Through six budget cycles, DCPS has failed to develop policies and procedures to ensure that at-risk funds are supplemental. The system also has failed to produce an overarching theory of action for how supplementary at-risk funds can help reduce the achievement gap. Without a consistent plan for addressing the achievement of at-risk students that can be evaluated and modified as needed the District will not meet the goals of the at-risk funding initiative.

DCPS would be well-advised to focus on evidence-based, direct instruction interventions targeted at improving the

academic outcomes of students considered at-risk when developing a strategy for supporting these schools and students. We are unaware of a rigorous evidence-base that supports the use of Instructional Superintendents to improve the achievement of at-risk students, as one example. Working with an independent research organization can provide both an existing evidence-base and the potential for developing local research on the uses of funds. Ongoing research with the RPP can help drive such continuous improvement.

The PCSB objects to Recommendation 6, claiming that consistent reporting of at-risk funds “contributes nothing to improved student performance” and that most recent PCSB at-risk funding reports are “comprehensive.” We stand by our recommendation, not only on transparency grounds, but also that clear, detailed reporting can help improve student achievement. How can the District replicate the best practices of successful charter LEAs without standardized reporting? Further, we disagree that the PCSB has yet collected comprehensive data on the use of at-risk funds in the charter sector. First, the survey is voluntary and not all LEAs receiving at-risk funds responded. Second, the survey does not break out personal and non-personal uses of funds nor does it provide school-level information. Third, all responses are self-reported and not verified by PCSB, the D.C. Council, or OSSE.

Finally, both DCPS and DCPCSB object to the terminology that at-risk students are shortchanged. Specifically, DCPS references differences in per pupil spending in response to ODCA’s findings that at-risk students are shortchanged. We do not contest whether DCPS provides more per pupil funding, on average, to schools with higher concentrations of at-risk students. The audit findings show that after accounting for all Formula, federal, or other funds provided to schools, the uses of at-risk funds ODCA investigated are largely not supplementary, as required by law. Further, in the charter sector, LEAs are not required to ensure that at-risk funds are supplemental. Without requirements that at-risk funds be supplemental students considered at-risk are not guaranteed equitable access to supplementary funds in all District public schools. When these funds are not supplementary, at-risk students are shortchanged.

Summary of Report Recommendations

The recommendations in this report can be implemented without any additional costs to the agency/entity, and help to advance the goals of the District of Columbia Public Schools (DCPS) and the District of Columbia Public Charter School Board (DC PCSB), as seen below.

Recommendation	Is There a Cost to the Agency/ Entity to Implement?	Potential to Generate Revenue or Savings to the District?	Specific Agency/ Entity or District-Wide Goal Advanced by Recommendation
<p>1. DCPS should establish transparent base funding for each school tied to enrollment and grade level. The annual budget process should use a specific and transparent methodology so that school communities are informed on both the method and the results.</p>	No	No	<p>DCPS Strategic Priorities: Promote Equity, define, understand and promote equity so that we eliminate opportunity gaps and systematically interrupt institutional bias.⁷⁶</p> <p>DCPS Goals: 100 Percent of schools are highly rated or are improving.⁷⁷</p>
<p>2. DCPS should publish each school’s base funding and supplemental at-risk allocations so principals and LSATs can identify what is base funding and what is supplemental.</p>	No	No	<p>DCPS Strategic Priorities: Engage Families, ensure communication and deepen partnerships with families and community</p>
<p>3. DCPS should establish internal controls for any adjustments to base funding including policies and procedures for allocating at-risk funds.</p>	No	No	<p>DCPS 2019 Strategic Objectives: Objective Number 6 to create and maintain a highly efficient, transparent and responsive District government.⁷⁸</p>

76 DCPS Strategic Plan – A Capital Commitment 2017-2022, page 4, available at https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/DCPS%20Strategic%20Plan%20-%20A%20Capital%20Commitment%202017-2022-English_0.pdf

77 Ibid, page 5.

78 DCPS FY19 Performance Plan and Report, page 1, available at <https://oca.dc.gov/sites/default/files/dc/sites/oca/publication/attachments/DCPSFY19.pdf>

Recommendation	Is There a Cost to the Agency/ Entity to Implement?	Potential to Generate Revenue or Savings to the District?	Specific Agency/ Entity or District-Wide Goal Advanced by Recommendation
<p>4. The Council should amend D.C. Code to strengthen at-risk provisions on “supplement not supplant” and apply these provisions to all public schools in D.C. to aid in its oversight of compliance with the at-risk funding requirements.</p>	No	No	<p>DCPS Strategic Priorities: Promote Equity, define, understand and promote equity so that we eliminate opportunity gaps and systematically interrupt institutional bias.⁷⁹</p> <p>DC PCSB 2019 Strategic Objectives: Objective Number 2 to promote increased school academic quality through improved oversight.⁸⁰</p>
<p>5. The District should evaluate and continuously improve its at-risk funded programs. In partnership with the forthcoming Research Practice Partnership (RPP), DME should initiate formal research on the context and impact of its at-risk funded initiatives, using rigorous quantitative and qualitative methods.</p>	No	No	<p>DCPS Strategic Plan Values: Courage – we have the audacity to learn from our successes and failures, to try new things, and to lead the nation as a proof point of PK-12 success.⁸¹</p>
<p>6. The Council should require consistent reporting of at-risk spending across all public schools</p>	No	No	<p>DC PCSB 2019 Strategic Objectives: Objective Number 4 to improve fiscal and compliance oversight.⁸²</p>

79 DCPS Strategic Plan – A Capital Commitment 2017-2022, page 4, available at https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/DCPS%20Strategic%20Plan%20-%20A%20Capital%20Commitment%202017-2022-English_0.pdf

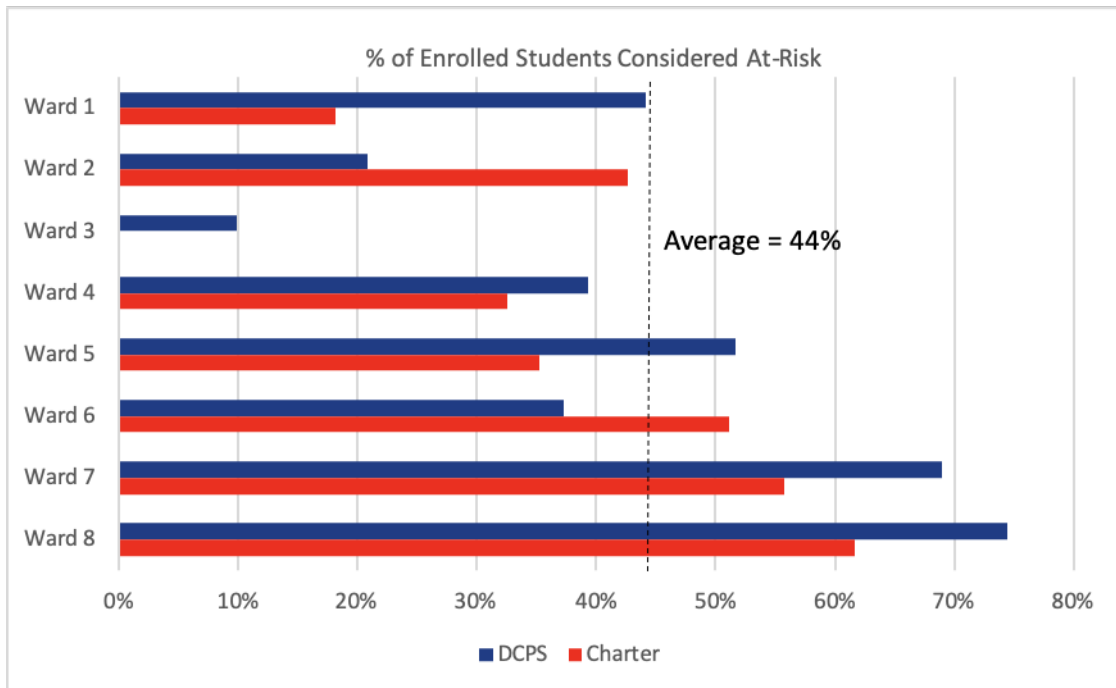
80 DC PCSB FY19 Performance Plan and Report, page 1, available at <https://oca.dc.gov/sites/default/files/dc/sites/oca/publication/attachments/PCSB19.pdf>

81 DCPS Strategic Plan – A Capital Commitment 2017-2022, page 3, available at https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/DCPS%20Strategic%20Plan%20-%20A%20Capital%20Commitment%202017-2022-English_0.pdf

82 DC PCSB FY19 Performance Plan and Report, page 1, available at <https://oca.dc.gov/sites/default/files/dc/sites/oca/publication/attachments/PCSB19.pdf>

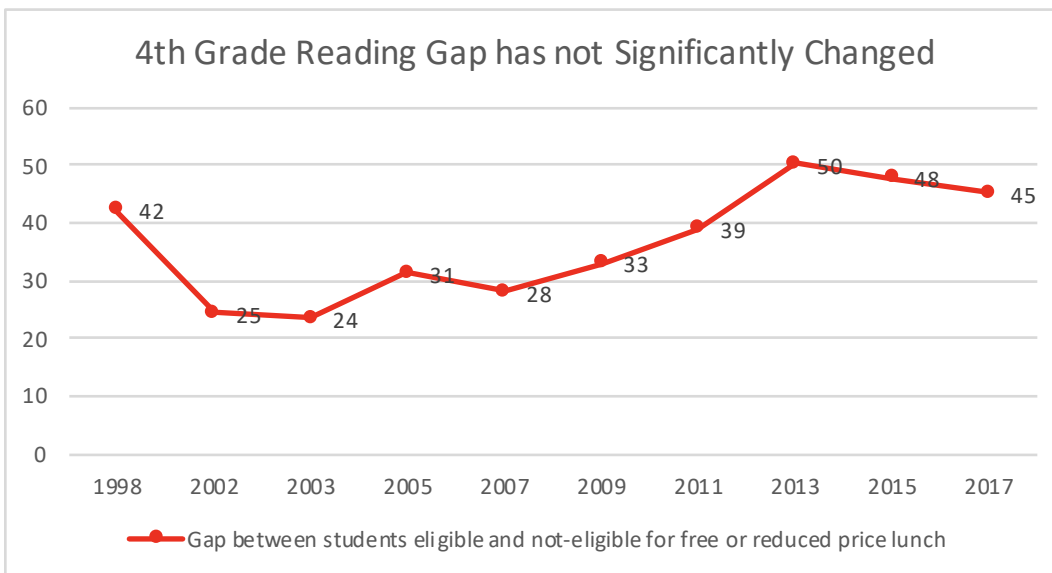
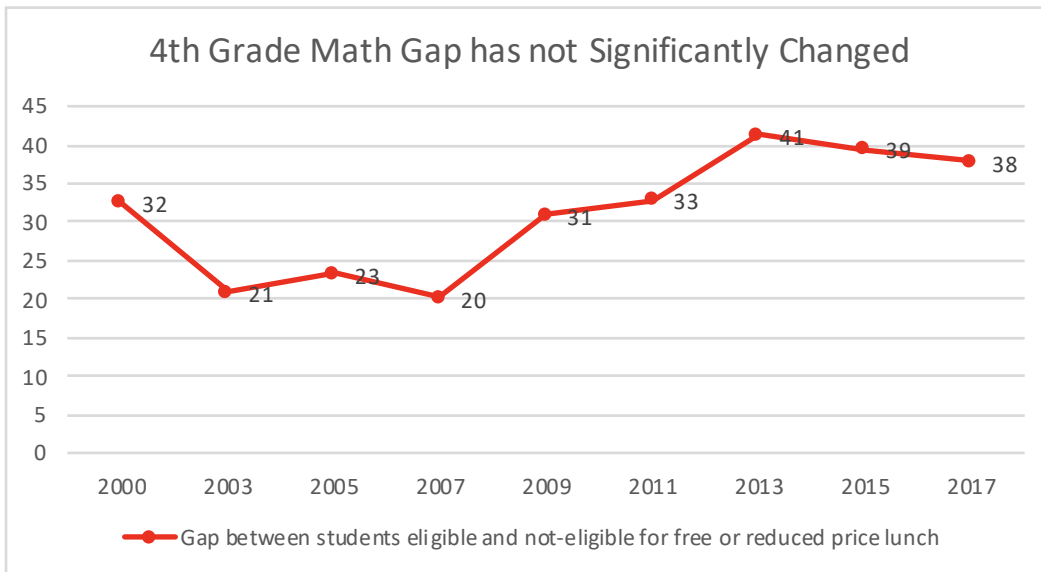
Appendices

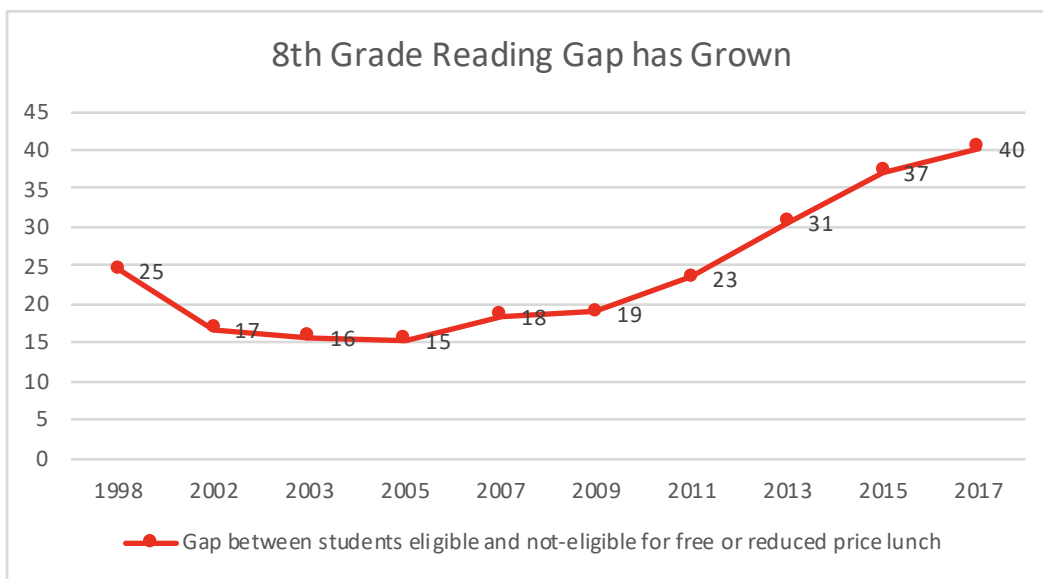
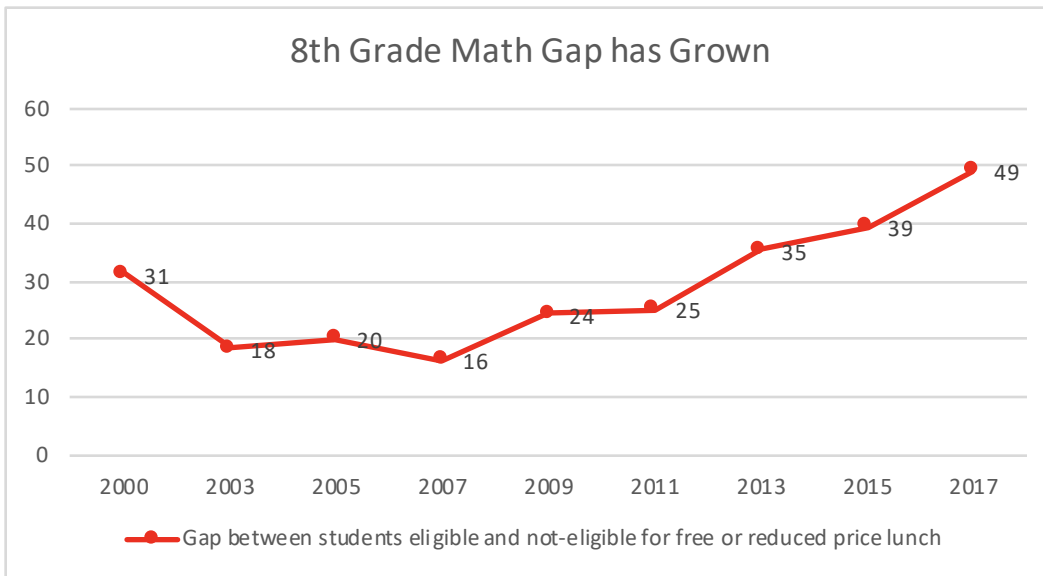
Appendix A:
At-Risk Enrollment by Ward and Sector,
All Schools, FY 2018



Source: OSSE Audited Enrollment

Appendix B:
NAEP Gaps, 2000–2017





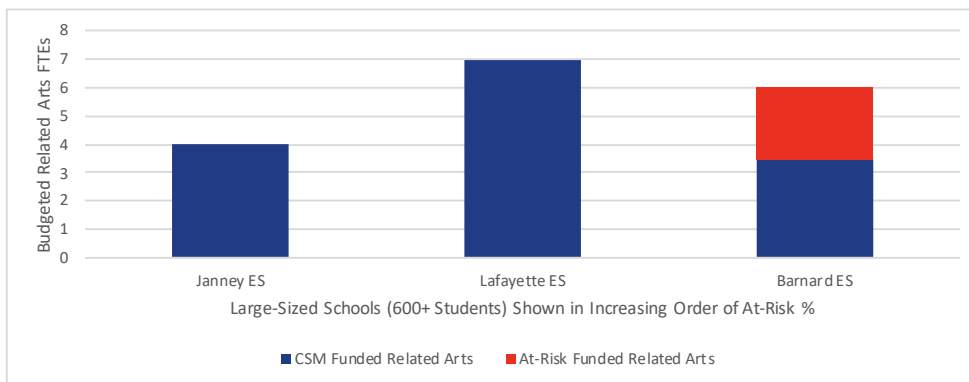
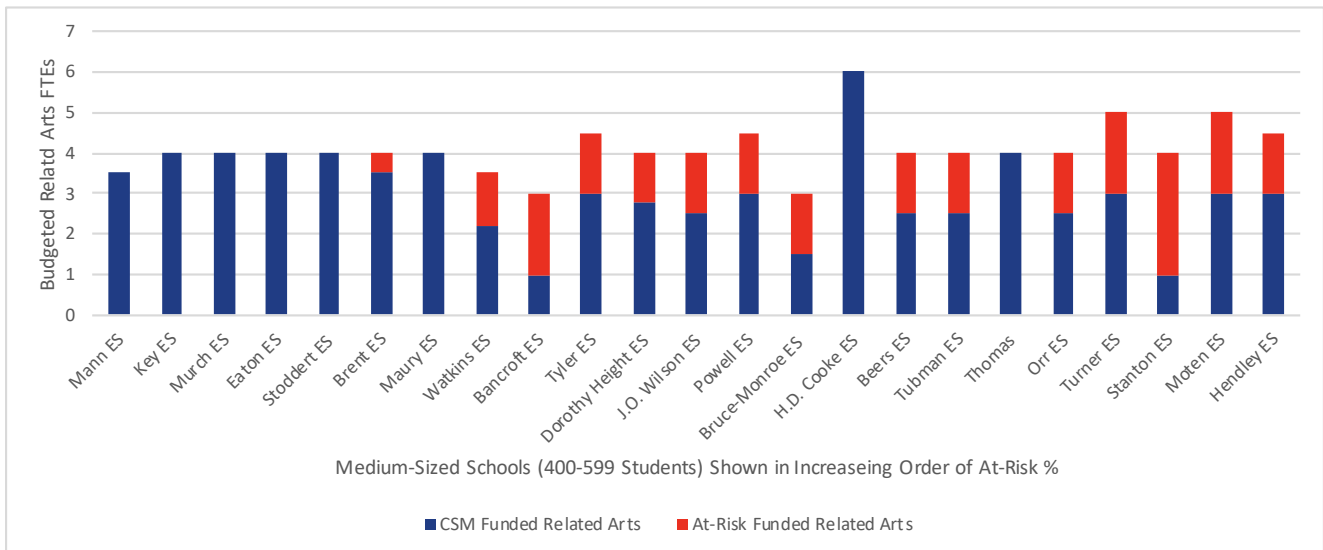
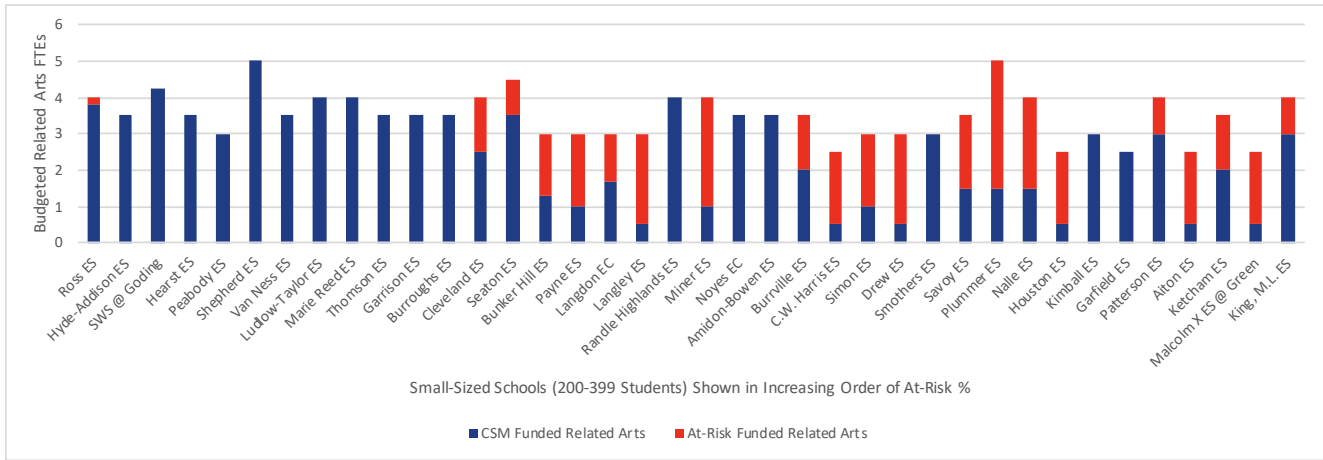
Source: National Assessment of Education Progress (NAEP), 2000-2017

Appendix C:
**Supplanted FTEs for Elementary Related Arts and
 Social Workers & Psychologists, DCPS FY 2018**

	Dollar Amount	Total At-Risk Funded FTEs	Supplanted At-Risk FTEs	% of FTEs Supplanted
Elementary Related Arts	\$6,361,030	65.2	54.0	83%
Social Workers & Psychologists	\$5,764,916	59.0	40.2	68%
Total Sample	\$12,125,946	124.2	94.2	77%

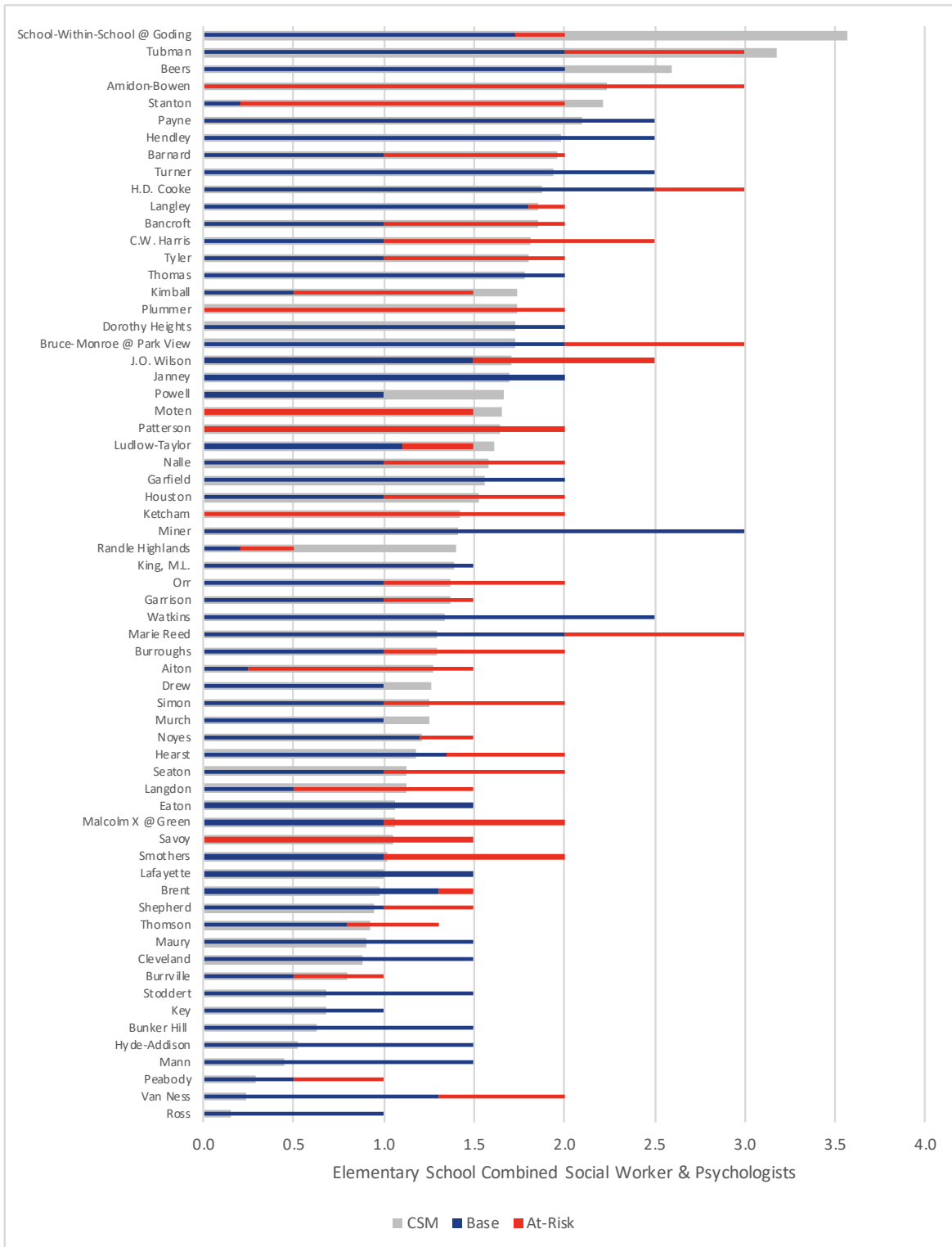
Source: DCPS Submitted Budgets, Fiscal Year 2018

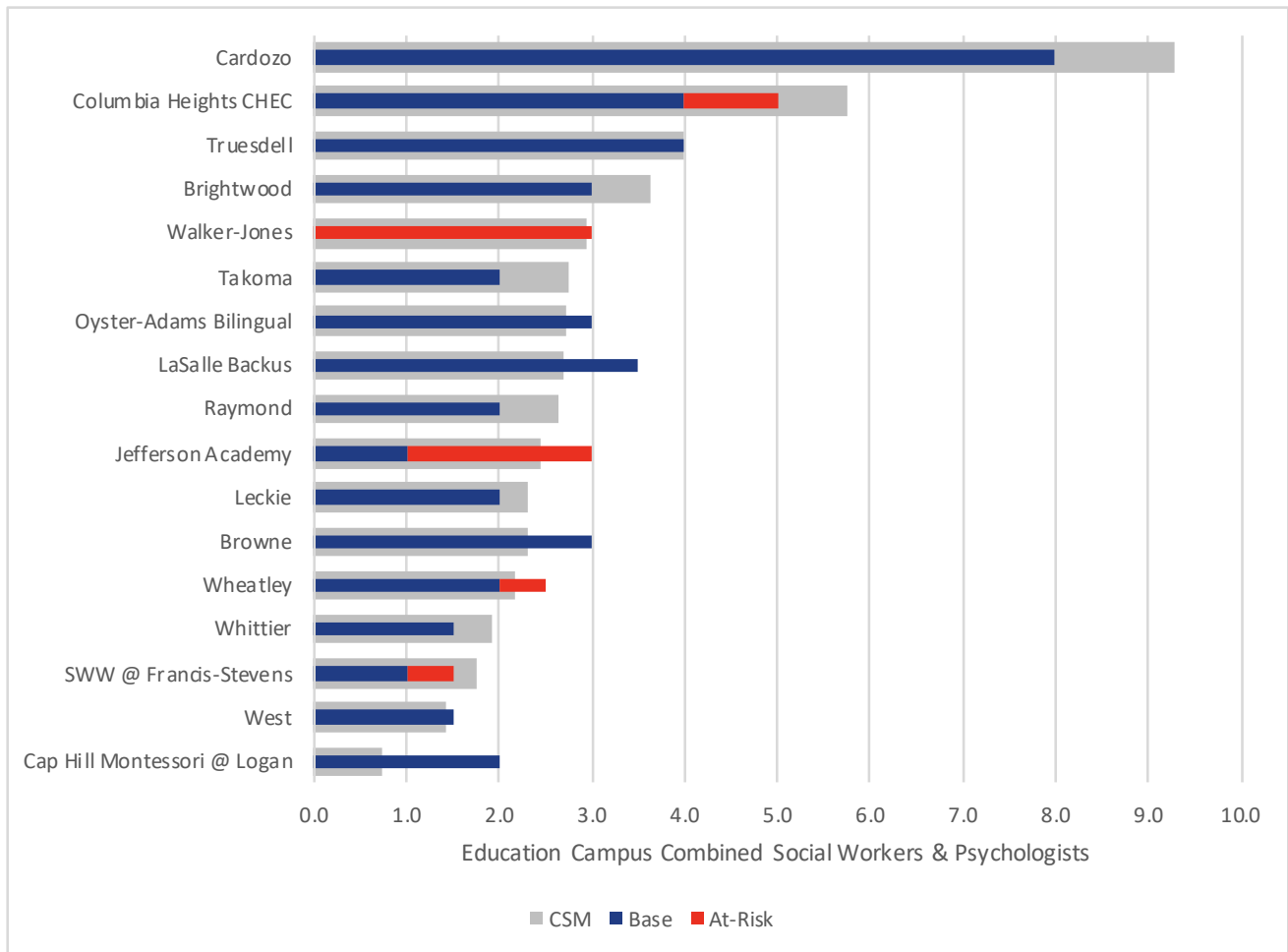
**Appendix D:
At-Risk Funding for Related Arts in DCPS
Elementary Schools, FY 2018**

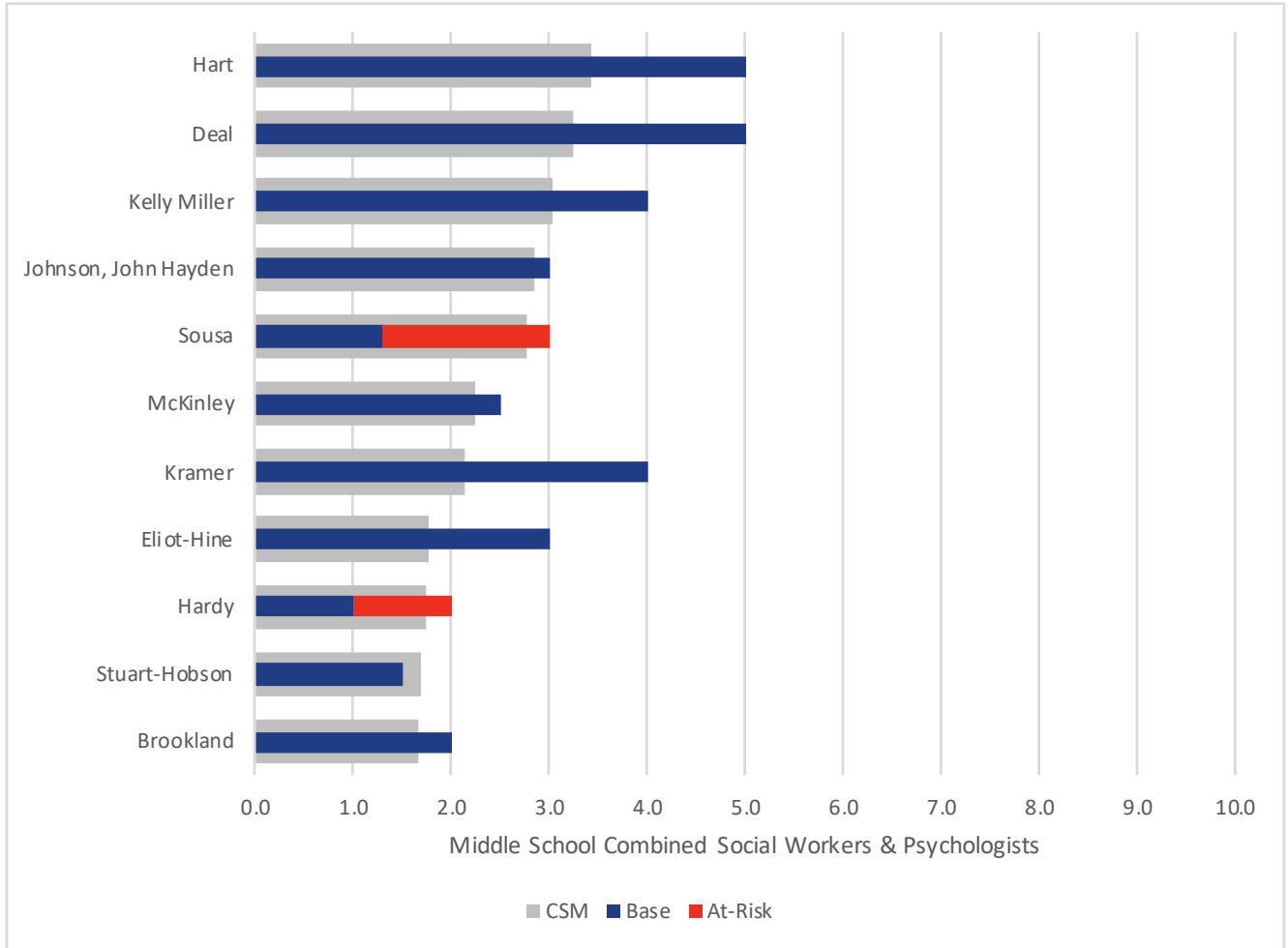


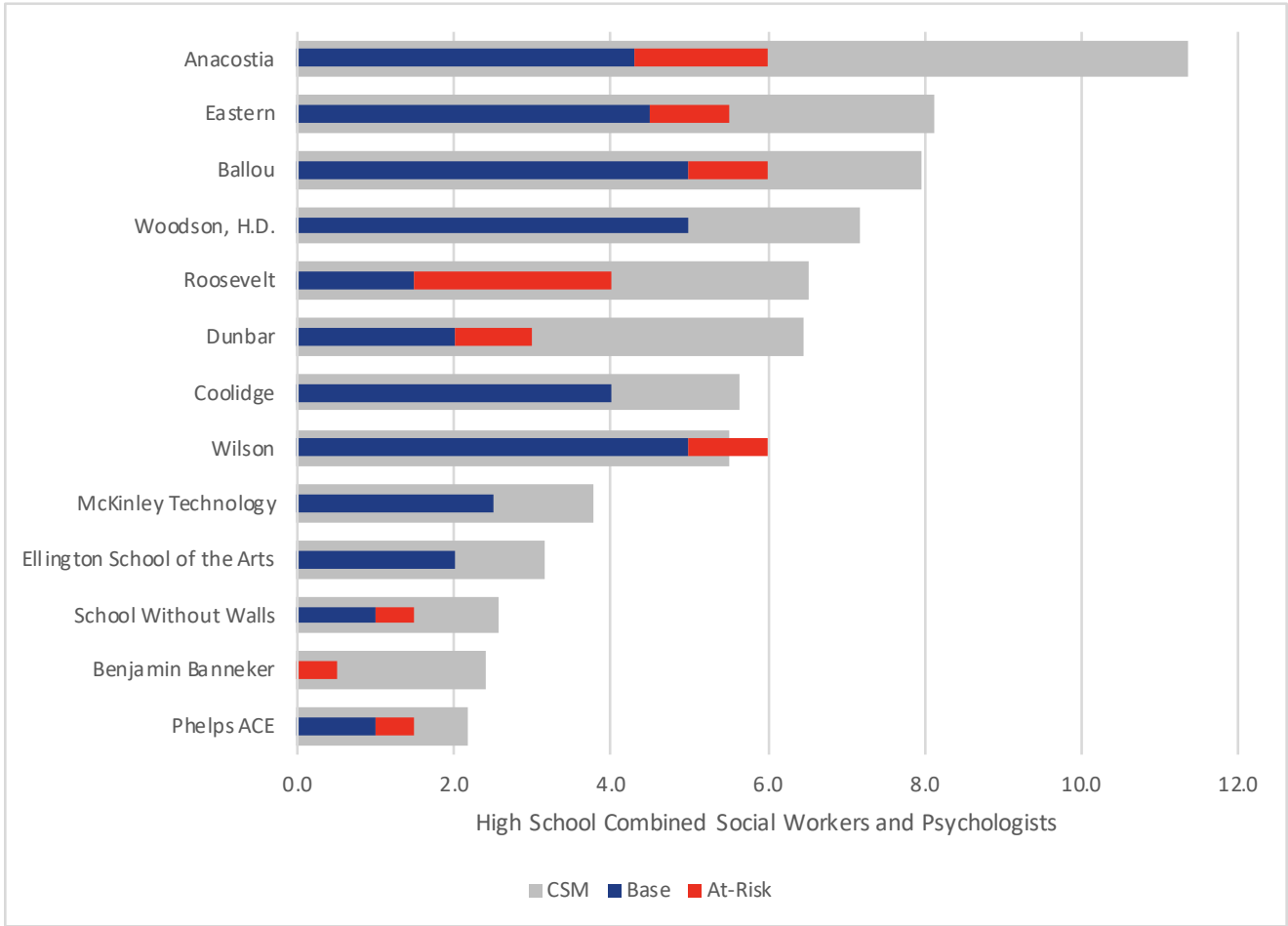
Source: FY 2018 DCPS school-level submitted budgets

Appendix E:
Base and At-Risk Funding for Social Workers & Psychologists as Compared to
Comprehensive Staffing Model Formula by Gradeband, FY 2018









Appendix F:
DCPS Extended-Year Schools
(School-Years 2016-17 to 2018-19)⁸³

School	Ward	% At-Risk (3-year Average)	Extended Year Funding, FY18	Total At-Risk Funding, FY18	% on Extended- Year, FY18
Garfield ES	Ward 8	85%	\$ 419,240.47	\$ 488,124.47	86%
H.D. Cooke ES	Ward 1	57%	\$ 388,176.69	\$ 480,376.19	81%
Hart MS	Ward 8	88%	\$ 429,399.33	\$ 567,540.71	76%
Hendley ES	Ward 8	92%	\$ 492,523.60	\$ 784,485.04	63%
Johnson MS	Ward 8	89%	\$ 321,761.05	\$ 422,266.05	76%
Kelly Miller MS	Ward 7	71%	\$ 486,394.25	\$ 594,659.19	82%
King, M.L. ES	Ward 8	89%	\$ 444,167.64	\$ 674,075.64	66%
Randle Highlands ES	Ward 7	63%	\$ 340,210.51	\$ 414,518.01	82%
Raymond EC	Ward 4	60%	\$ 614,675.84	\$ 726,374.84	85%
Thomas ES	Ward 7	73%	\$ 546,254.20	\$ 610,155.20	90%
Turner ES	Ward 8	87%	\$ 563,809.44	\$ 865,839.44	65%
			\$ 5,046,613.03	\$ 6,628,414.79	76%

Source: DCPS Submitted Budgets, Fiscal Year 2018

83 Luke C. Moore High School and Roosevelt STAY High School became extended-year schools in school-year 2018-19. Neither school used at-risk funding to support this program, therefore are not included in this analysis.

Appendix G:
DCPS At-Risk Funding Categories, FY2016 to FY2020

Fiscal Year 2016: 18 At-Risk Funded Items Totaling \$44,916,041

Classroom Instruction	Extended Learning Time	Leadership & School Operations	Non-Personal Services	Related Arts Teachers	Schoolwide Instructional Support Positions	Social-Emotional Positions	Special Education Positions
Classroom Instructional Support	Evening Credit Recovery (ECR)	Admin	At-risk Technology Investment	Related Arts Teachers	School-wide Instructional Support	Social-Emotional Support	Special Education
Continued Middle School Investments	Extended Day		Literacy Supports				
English Language Learners (ELL)			Non-Personnel Services (NPS)				
General Education Teacher			PWP - Student Satisfaction				
High Schools Priority			Related Arts, Science, & Custodial Supply Investments				
			Specialty				

Fiscal Year 2017: 41 At-Risk Funded Items Totaling \$47,296,883

Classroom Instruction	Extended Learning Time	Leadership & School Operations	Non-Personal Services	Related Arts Teachers	Schoolwide Instructional Support Positions	Social-Emotional Positions	Special Education Positions
DC Teacher Resident (DCTR)	Afterschool	Assistant Principal	Contractual Partnerships	Related Arts Teacher	Athletics & Activities Coordinator	Attendance Counselor	Special Education Coordinator (SEC)
Dual Language Program Teacher	Evening Credit Recovery (ECR)	Dean of Students	Educational Supplies		Instructional Coach	Behavior Technician	

Classroom Instruction	Extended Learning Time	Leadership & School Operations	Non-Personal Services	Related Arts Teachers	Schoolwide Instructional Support Positions	Social-Emotional Positions	Special Education Positions
General Education Teacher	Extended Day	Strategy & Logistics Director (DSL)	Field Trips		NAF Coordinator	Bilingual Guidance Counselor	
High School Investment (HSI) Teacher	Extended Year		High School Investment (HSI) Extended Hours for Computer Lab		NAF Director	Guidance Counselor	
Inclusion/Resource Teacher			Middle Grade Investment (MGI) Clubs & Activities		Pathways Coordinator	In-School Suspension (ISS) Coordinator	
Instructional Aide			Middle Grade Investment (MGI) Exposure & Excursion		Reading Specialist or Teacher	Psychologist	
Middle Grade Investment (MGI) Teacher			Middle Grade Investment (MGI) Social-Emotional Support Funds		Technology Instructional Coach	Social Worker	
Resource Teacher			Specialty Funds				
TLI Teacher Leader			Technology				

Fiscal Year 2018: 27 At-Risk Funded Items \$48,479,230

Classroom Instruction	Extended Learning Time	Leadership & School Operations	Non-Personal Services	Related Arts Teachers	Schoolwide Instructional Support Positions	Social-Emotional Positions	Special Education Positions
High School Teachers Investment	After school	Assistant Principal for Intervention	City Year/Partnerships	Related Arts Teacher	Athletic & Activities Coordinators	Middle Grades Social-Emotional	
Inclusion/Resource Teachers	Evening Credit Recovery (ECR)		Educational Supplies		Manager Coordinator	Psychologist	

Classroom Instruction	Extended Learning Time	Leadership & School Operations	Non-Personal Services	Related Arts Teachers	Schoolwide Instructional Support Positions	Social-Emotional Positions	Special Education Positions
Middle Grades Teacher Investment	Extended Day		High School Extended Hours for Computer Lab		NAF Coordinator	Social Worker	
Relay Teacher Resident	Extended Year		Middle Grades Clubs & Activities		NAF Director		
			Middle Grades Exposure & Excursion		Pathways Coordinator		
			Specialty Funds		Reading Specialist or Teacher		
			Technology		Technology Instructional Coach		

Fiscal Year 2019: 47 At-Risk Funded Items Totaling \$52,572,807

Classroom Instruction	Extended Learning Time	Leadership & School Operations	Non-Personal Services	Related Arts Teachers	Schoolwide Instructional Support Positions	Social-Emotional Positions	Special Education Positions
High School Teachers Investment	Afterschool Program	Aide - Administrative	City Year/ Partnerships	Related Arts	Aide - Computer Lab	Attendance Counselors	Director of Special Education
Instructional Aide	Evening Credit Recovery (ECR)	Assistant Principal for Intervention	Clothing and Uniforms		Athletics & Activities Coordinator	Behavior Tech	Manager of Special Education
Middle Grades Teacher Investment	Extended Day	Assistant Principal for Literacy/Math	Conference Fees (Out of City)		Instructional Coaches (Tech, Math, ELA)	Guidance Counselor	Special Education Coordinator
Resource Teacher/ Coordinator	Extended Year	Clerk	Contractual Services		International Baccalaureate Coordinator	In-School Suspension Coordinator	
Urban Teacher Residents	High School Extended Hours for Computer Lab	Custodian (RW-5)	Custodial Overtime		NAF Coordinator	Psychologists	
		Dean of Students	Literacy Partners		NAF Director	Social Workers	
			Local and Out-of-City Travel		Pathways Coordinator		
			Middle Grades Clubs & Activities		Reading Specialist/ Teacher		
			Middle Grades Exposure & Excursion				
			Professional Development				
			Supplies (Educational, General, Office)				
			Technology				
			Textbooks				

Fiscal Year 2020: 92 At-Risk Funded Items Totaling \$55,380,877

Classroom Instruction	Extended Learning Time	Leadership & School Operations	Non-Personal Services	Related Arts Teachers	Schoolwide Instructional Support Positions	Social-Emotional Positions	Special Education Positions
Aide - Instructional - (10mo)	Afterschool Administrative Aide	Administrative Officer	Administrative Premium (General)	Teacher - Art	Aide - Computer Lab	Attendance Counselor	Coordinator - Special Education (CSE)
Aide - Instructional - Year Round (80 hr)	Afterschool Aide	Assistant - Strategy & Logistics (ASL)	Clothing and Uniforms	Teacher - Health/ Physical Education	Aide - Library/ Technology	Behavior Technician	Director - Specialized Instruction (DSI)
Teacher - Inclusion/ Resource Services	Afterschool Coordinator	Assistant Principal - English Language Arts (ELA)	Conference Fees (Out of City)	Teacher - Performing Arts/Drama	Coordinator - Computer Lab/ Technology	Coordinator - In-School Suspension (ISS)	Manager - Specialized Instruction (MSI)
Teacher - Reading	Afterschool Teacher	Assistant Principal - Intervention (API)	Contractual Services	Teacher - World Language	Coordinator - Global Studies	Coordinator - Student Resource	TLI Teacher Leader - Special Education
Teacher - Resource	Evening Credit Recovery (ECR)	Assistant Principal - Math	Custodial Overtime	Teacher, Physical Education Aquatics	Coordinator - Intl Baccalaureate	Guidance Counselor - 10mo	
Teacher - Schoolwide Enrichment Model (SEM)	Extended Day Funds	Assistant Principal - Other	Custodial Services		Coordinator - Program	Guidance Counselor - 10mo (Bilingual)	
Teacher - STEM		Clerk	Educational Supplies		Instructional Coach - English Language Arts (ELA)	Guidance Counselor - 11mo	
TLI Teacher Leader - Culture		Coordinator - Parent	Electronic Learning		Instructional Coach - Math	Social Worker	
TLI Teacher Leader - Early Childhood Education		Coordinator - Strategy & Logistics (CSL)	Equipment and Machinery (over \$5,000)		Intervention Coach		
TLI Teacher Leader - English Language Arts (ELA)		Custodian (RW-5)	Equipment and Machinery (under \$5,000)		Specialist - Library/Media		
TLI Teacher Leader - Math		Dean of Students	Food and Provisions (Including Catering)		Specialist - Reading		

Classroom Instruction	Extended Learning Time	Leadership & School Operations	Non-Personal Services	Related Arts Teachers	Schoolwide Instructional Support Positions	Social-Emotional Positions	Special Education Positions
Urban Teacher Residency		Director - Strategy & Logistics (DSL)	General Supplies		Specialist - Transition		
		Manager - Strategy & Logistics (MSL)	IT Equipment/ Hardware		Teacher - Computer		
		Registrar	IT supplies (consumables)		Technology Instructional Coach (TIC)		
			Literacy Materials				
			Literacy Partners				
			Local Travel (STAFF - Including Field Trips)				
			Local Travel (Students - Including Field Trips)				
			Middle Grades Enrichment & Activities				
			Middle Grades Exposures & Excursions				
			Office Supplies				
			Out of City Travel (Staff - Including International)				
			Out of City Travel (Students - Including International)				
			Printing				
			Professional Development				

Classroom Instruction	Extended Learning Time	Leadership & School Operations	Non-Personal Services	Related Arts Teachers	Schoolwide Instructional Support Positions	Social-Emotional Positions	Special Education Positions
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Professional Services

Recreational Materials

Stipends

Textbooks

Appendix H:
DCPS Comprehensive Staffing Model Formula for
Allocating Social Workers and Psychologists, FY 2018

Social Workers: # FTEs required = Total hours required/month divided by the total work hours/month



Meetings = $(X*3.5+Y*2+Z*3.5)/9$

Documenting = $BD*(AD/60)$

Assessments = $IF(M+O>Z*(1+AL),((M*N)+(O*P))/9,(Z*(1+AN)*MIN(N,P)/9))$

Other services = $((F*AI*AJ*AO)+(F*AK*AL*AO)+(1*AM)+(V*W*AO)+K)$

Prescribed hours/month = J

Cell	Significance
F	Total school enrollment
J	Total prescribed Behavior Support Services (BSS) IEP
K	Blank
M	Total Functional Behavior Assessments (FBA)
N	Estimated number of hours to complete a Functional Behavior Assessment
O	Total Social History Assessments
P	Estimated number of hours to complete a Social History Assessment
V	RTI Max
W	RTI Time
X	Social Worker Initial IEP meeting
Y	Social Worker IEP meeting
Z	Social Worker Triennial Eligibility meeting
AA	Psychologist Initial IEP meeting
AB	Psychologist Annual IEP meeting
AC	Psychologist Triennial Eligibility meeting
AD	Service documentation time, 10 minutes of documentation per every hour of service
AI	Tier I services %
AJ	Tier I service time, the estimated time a provider spends providing tier I services per month
AK	Tier II services %
AL	Tier II services (time)
AM	Number of manifestation determination meetings held during the previous school year
AN	Percentage of meetings requested by parents
AO	Economically Disadvantaged %

Psychologists: # FTEs required = Total hours required/month divided by the total work hours per month



Meetings = $(AA*4.5+AB*2+AC*3)/9$

Assessments = $IF(Q>(AC*(1+AN)),(Q*R)/AW,(AC*19*(1+AN))/9)$

Other services = $(V*0.5)+(AM*1)+(AI*0.25*F*AO)+(AK*AJ*F*AO)$

Prescribed hours/month = 0

Cell	Significance
F	Total school enrollment
J	Total prescribed Behavior Support Services (BSS) IEP
K	Blank
M	Total Functional Behavior Assessments (FBA)
N	Estimated number of hours to complete a Functional Behavior Assessment
O	Total Social History Assessments
P	Estimated number of hours to complete a Social History Assessment
V	RTI Max
W	RTI Time
X	Social Worker Initial IEP meeting
Y	Social Worker IEP meeting
Z	Social Worker Triennial Eligibility meeting
AA	Psychologist Initial IEP meeting
AB	Psychologist Annual IEP meeting
AC	Psychologist Triennial Eligibility meeting
AD	Service documentation time, 10 minutes of documentation per every hour of service
AI	Tier I services %
AJ	Tier I service time, the estimated time a provider spends providing tier I services per month
AK	Tier II services %
AL	Tier II services (time)
AM	Number of manifestation determination meetings held during the previous school year
AN	Percentage of meetings requested by parents
AO	Economically Disadvantaged %
AW	Months per year available for assessments and meetings

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DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL

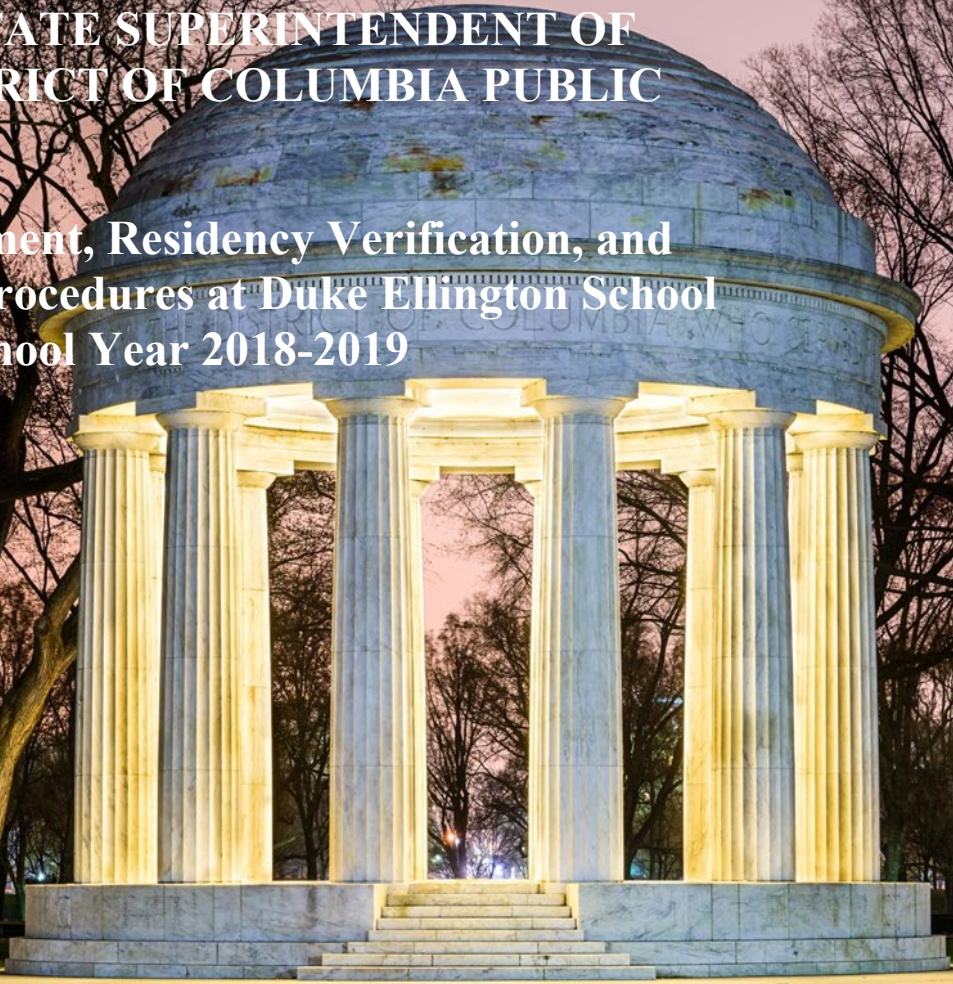
OIG Project No. 19-I-06GD

September 2019



OFFICE OF THE STATE SUPERINTENDENT OF EDUCATION, DISTRICT OF COLUMBIA PUBLIC SCHOOLS:

Evaluation of Enrollment, Residency Verification, and
Tuition Agreement Procedures at Duke Ellington School
of the Arts for the School Year 2018-2019



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*Workforce Engagement * Stakeholders Engagement * Process-oriented * Innovation
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GOVERNMENT OF THE DISTRICT OF COLUMBIA

Office of the Inspector General



Inspector General

September 30, 2019

Hanseul Kang
State Superintendent of Education
Office of the State Superintendent of Education
1050 First Street, N.E.
Washington, D.C. 20002

Lewis D. Ferebee
Chancellor
District of Columbia Public Schools
1200 First Street, N.E.
Washington, D.C. 20002

Dear State Superintendent Kang and Chancellor Ferebee:

Enclosed is our final report entitled: *Evaluation of Enrollment, Residency Verification, and Tuition Agreement Procedures at Duke Ellington School of the Arts for the School Year 2018-2019* (OIG Project No. 19-I-06GD). The objectives of this evaluation were to assess: (1) the residency verification process to determine if there are sufficient internal controls to prevent incorrect student residency classification; and (2) the tuition agreement and payment process for non-residency students. The scope of this evaluation was limited to the Duke Ellington School of the Arts (Duke Ellington) and covered School Year (SY) 2018-2019. OIG evaluations are conducted under the Quality Standards for Inspection and Evaluation promulgated by the Council of the Inspectors General on Integrity and Efficiency.

The OIG sent a draft report for comment on September 12, 2019. DCPS' and OSSE's responses, dated September 27, 2019, and September 30, 2019, respectively, are quoted in the final report and presented in their entirety in Appendix E. If you have questions about this report, please contact me or Edward Farley, Assistant Inspector General for Inspections and Evaluations, at (202) 727-2540. The OIG will follow up on the implementation status of each recommendation next fiscal year.

Sincerely,



Daniel W. Lucas
Inspector General

DWL/ef

cc: See Distribution List

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Why the OIG Did This Evaluation

This was an emergent project initiated at the request of OSSE; therefore, the project was not identified in the OIG's *Fiscal Year 2019 Audit and Inspection Plan*.

The objectives of the evaluation were to assess: (1) the residency verification process to determine if there were sufficient internal controls to prevent incorrect student residency classification; and (2) the tuition agreement and payment process for non-resident students. The scope of this evaluation was limited to Duke Ellington School of the Arts (Duke Ellington) and covered School Year (SY) 2018-2019.

What the OIG Recommends

This report presents five recommendations to OSSE, DCPS, and Duke Ellington to address issues identified through our evaluation. These recommendations are intended to improve compliance with District laws and regulations related to the prioritization of District resident students over non-resident students for the purposes of admission to a District public school, and with U.S. Government Accountability Office (GAO) standards for an effective internal control system.

OFFICE OF THE STATE SUPERINTENDENT OF EDUCATION, DISTRICT OF COLUMBIA PUBLIC SCHOOLS:

Evaluation of Enrollment, Residency Verification, and Tuition Agreement Procedures at Duke Ellington School of the Arts for the School Year 2018-2019

What the OIG Found

The Office of the Inspector General (OIG) Inspections & Evaluations Unit (I&E) evaluated the student residency verification and tuition agreement and payment processes at Duke Ellington School of the Arts (Duke Ellington) during School Year (SY) 2018-2019. This evaluation involved two District agencies: the Office of the State Superintendent of Education (OSSE) and the District of Columbia Public Schools (DCPS). OSSE, DCPS, and Duke Ellington are all involved with verifying the sufficiency of residency documentation; OSSE is the only agency responsible for collecting tuition.

During fieldwork, the OIG noted significant changes and improvements to the student residency verification and tuition agreement and payment processes during SY 2018-2019, as compared to prior SYs. These changes and improvements included: 1) execution of a new Memorandum of Agreement (MOA) between DCPS and Duke Ellington's managing body, the Duke Ellington School of the Arts Project (DESAP); 2) a commitment from DCPS and Duke Ellington to have an independent auditor conduct an in-depth review of Duke Ellington, DESAP, and its Board of Directors (BOD); and 3) OSSE's development of a new online tuition management system.

The OIG also identified several areas for improvement in the student residency verification and tuition agreement and payment processes, which include: 1) Duke Ellington's lack of clear admissions policies and/or procedures implementing 5A District of Columbia Municipal Regulations (DCMR) § 5001.2, which requires prioritizing District resident students over non-residents seeking admission to a District public school; and 2) enrollment of non-resident students with incomplete and/or unapproved Tuition Agreements.

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BACKGROUND

A student is entitled to attend a District public school for free if documentation is provided proving his or her parent,¹ custodian,² guardian,³ or other primary caregiver⁴ is a District resident.⁵ D.C. Code sets forth the types of documentation accepted to support District residency claims,⁶ and the Office of the State Superintendent of Education (OSSE) establishes the “rules and procedures to carry out residency verification as it deems appropriate and as are consistent with [the D.C. Code].”⁷ Students of non-residents are also eligible to attend District public schools, but only if they pay non-resident tuition to support the school’s expenses related to their matriculation.⁸

The District of Columbia Public Schools (DCPS) is a Local Education Agency (LEA)⁹ and serves as a liaison between OSSE and individual public schools in the District. Funding for District public schools is regulated on a per-District-resident-student basis;¹⁰ therefore, D.C. Code § 38-1804.02 requires an Annual Enrollment Audit to verify the number of resident and non-resident students enrolled in District public schools. OSSE procures an independent audit firm to conduct the Annual Enrollment Audit.

Duke Ellington School of the Arts (Duke Ellington) is a District public high school, under the authority of DCPS, and is also one of eight *selective* high schools and programs in the city.¹¹ Named in honor of a District native, Duke Ellington aims to nurture students “who might not otherwise have an opportunity to develop their artistic skills.”¹² Duke Ellington has a unique

¹ The term “parent” is defined as “a natural parent, stepparent, or parent by adoption who has custody or control of a student, including joint custody.” D.C. Code § 38-301(11).

² The term “custodian” is defined as “a person to whom physical custody has been granted by a court of competent jurisdiction.” *Id.* § 38-301(6).

³ The term “guardian” is defined as “a person who has been appointed legal guardian of a student by a court of competent jurisdiction.” *Id.* § 38-301(8).

⁴ The term “other primary caregiver” is defined as “a person other than a parent or court appointed custodian or guardian who is the primary provider of care and support to a child who resides with him or her, and whose parent, custodian, or guardian is unable to supply such care and support and who submits evidence, pursuant to § 38-310 and procedures established pursuant to § 38-311, that he or she is the primary caregiver of the student.” *Id.* § 38-301(10).

⁵ *See id.* §§ 38-306 – 307.

⁶ *See id.* §§ 38-309 – 310.

⁷ *Id.* § 38-308; *see also id.* § 38-2602(b)(3).

⁸ *See id.* §§ 38-302(a)-(b).

⁹ LEA is “an educational institution at the local level that exists primarily to operate a publicly funded school or schools in the District of Columbia, including the District of Columbia Public Schools and a District of Columbia public charter school.” *Id.* § 38-2601.02(3).

¹⁰ Funding is based on enrollment numbers to ensure that every District public school is funded at a fair and structured level as determined by the Uniform Per Student Funding Formula. These funds are allocated from the District’s General Fund. *See id.* § 38-2901(8); *see also id.* § 38-1804.01.

¹¹ As explained on the My School DC website, “DCPS selective high schools and programs are citywide options with no boundaries [...] that admit students based on specific admissions requirements and selection criteria.” <https://www.myschooldc.org/how-apply/applying-high-school> (last visited May 22, 2019).

¹² *See* Duke Ellington School of the Arts website, available at <http://www.ellingtonschool.org/about/history-mission/> (last visited May 21, 2019).

structure in that it is funded by both the District government and the Ellington Fund.¹³ Multiple entities provide oversight: DCPS; OSSE; Duke Ellington’s Board of Directors (BOD); and the Duke Ellington School of the Arts Project (DESAP). DCPS and DESAP executed a Memorandum of Agreement (MOA) governing Duke Ellington’s relationship with the District in September 2000, and recently entered into a new agreement in January 2019, which is discussed later in this report.

OSSE’s Annual Enrollment Audit for School Year (SY) 2017-2018 initially uncovered student records at Duke Ellington that did not contain documentation required to support District residency.¹⁴ In response to potential recordkeeping and residency verification non-compliance, OSSE investigated the enrollment files for all 570 students who were enrolled at Duke Ellington. At the conclusion of the investigation, OSSE published its findings entitled, *Report on Residency Investigation at Duke Ellington School of the Arts*, in May 2018. The report stated a high number of student records lacked sufficient documentation to prove residency.¹⁵ It also noted OSSE would issue DCPS a Corrective Action Plan to improve compliance with residency requirements.¹⁶

On May 11, 2018, OSSE requested the OIG’s assistance with evaluating residency compliance at Duke Ellington. In response, the OIG conducted this evaluation and assessed the sufficiency of internal controls within the residency verification process and the tuition agreement and payment process.

Overview of Student Residency Verification Process for SY 2018-2019

The steps OSSE, DCPS, and Duke Ellington took to verify the sufficiency of residency documentation are outlined in Figure 1 on the following page.

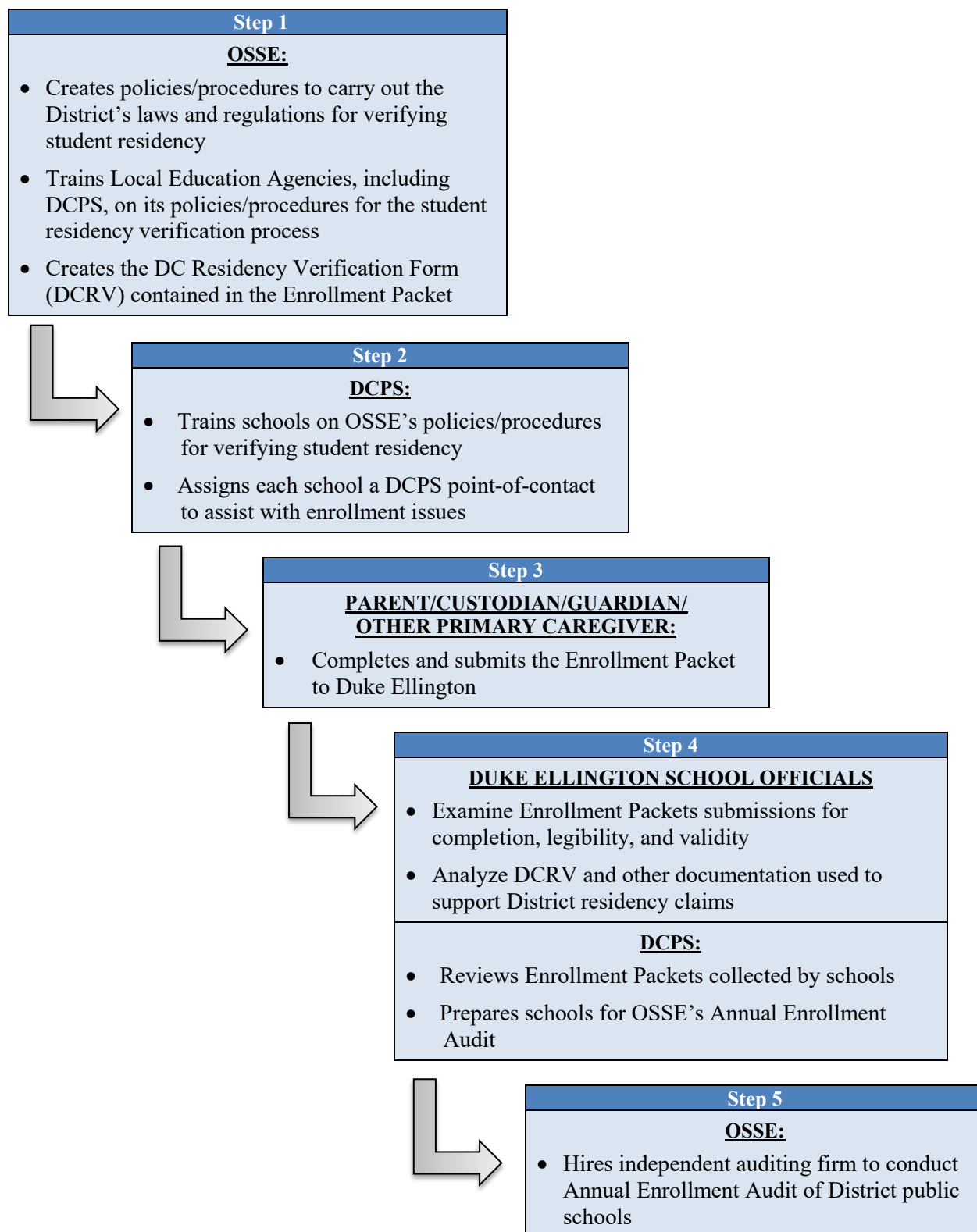
¹³ The Ellington Fund is a “501(c)(3) organization established in 1979 to serve as the charitable arm of [Duke Ellington]” by supporting “several programs and activities at [Duke Ellington] that are not funded by [DCPS]” and acquiring “funding from individual donors, organizations, and corporations to provide the finances necessary to bridge the funding gap to support its diverse arts programs.” <http://www.ellingtonschool.org/profiles/the-ellington-fund-2/> (last visited May 7, 2019).

¹⁴ For the purposes of establishing student residency, a bona fide resident of the District must: 1) establish a physical presence in the District; and 2) submit valid and proper documentation in accordance with 5A DCMR §§ 5004.2 or 5004.3. See 5A DCMR § 5001.5. See also D.C. Code § 38-308(a), stating residency must be established by “October 5, or within 10 days of the time of initial enrollment, whichever occurs later, within the school year for which the student is being enrolled.”

¹⁵ See REPORT ON RESIDENCY INVESTIGATION AT DUKE ELLINGTON SCHOOL OF THE ARTS (May 2018). OSSE later published an update on its investigation into Duke Ellington in November 2018. This updated report indicated that of the 220 student cases that warranted further action, 175 cases were now closed, 44 remained opened; and 1 was removed from the total count (and the school) because the student was determined to be a non-resident before the investigation began. See INTERIM UPDATE ON DUKE ELLINGTON INVESTIGATION (Nov. 2018).

¹⁶ On June 15, 2018, DCPS submitted to OSSE its Corrective Action Plan listing four steps it planned to take to increase oversight and monitoring of enrollment practices at Duke Ellington.

Figure 1: Student Residency Verification Process for SY 2018-2019¹⁷



¹⁷ Source: OIG analysis of agency policies and procedures, official forms, and interviews with relevant OSSE, DCPS, and Duke Ellington employees, 2019.

The student residency verification process requires the collaborative efforts of DCPS and school officials. School officials bear the initial and primary responsibility for collecting, analyzing, and verifying the sufficiency of student residency documentation. This can be a complex, time-consuming process as there are various living arrangements and residency scenarios that may require more in-depth analysis. For example, District residency may be more challenging to prove or understand when a student primarily lives with relatives outside the District, although the student's divorced biological parents are residents of the District. School officials rely on DCPS to assist with analyzing and verifying the sufficiency of student residency documentation.

OSSE maintains a largely oversight role throughout the student residency verification process. OSSE provides training to DCPS on new or updated policies and procedures related to student residency. DCPS supports school officials by passing along information it receives from OSSE's trainings and working directly with school officials to resolve residency verification issues.

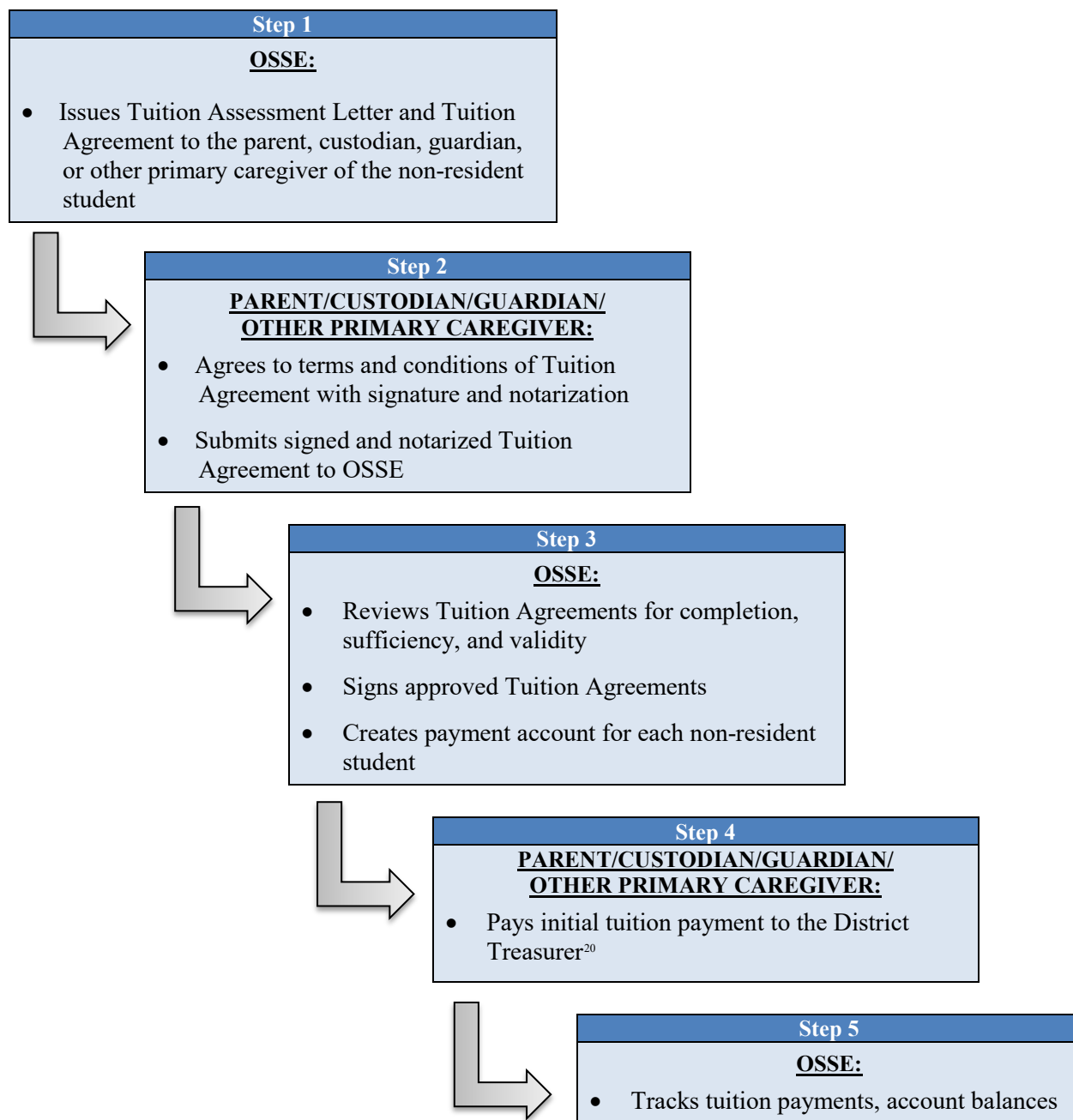
The student residency verification process concludes with OSSE contracting with an independent firm to audit student residency documentation and verify the number of resident and non-resident students at all District public schools, including Duke Ellington. The number of students verified as residents at a school determines how much funding the school receives for the following school year, and OSSE collects tuition from the non-resident student families.

Overview of the Tuition Agreement and Payment Process for SY 2018-2019

Unlike the student residency verification process, only OSSE manages the tuition collection process.¹⁸ Students who self-identify as non-residents of the District are directed to contact OSSE to execute Tuition Agreements and make tuition payments. Figure 2 on the following page outlines the steps for paying tuition once OSSE is notified that a Duke Ellington student is a non-resident:

¹⁸ Although DCPS and school officials are not involved in this process, OSSE may refer potential non-resident cases to the District of Columbia Office of the Attorney General (OAG) to independently investigate and determine whether there is residency and/or tuition fraud. If fraud is found, the OAG may decide to file a lawsuit under the False Claims Act or other legal theories. See <https://oag.dc.gov/blog/understanding-non-resident-tuition-enforcement> (last visited May 14, 2019).

Figure 2: Tuition Agreement and Payment Process for SY 2018-2019¹⁹



Non-residents were eligible to enroll in District public schools under four conditions during SY 2018-2019: 1) the non-resident student received an offer of admission from the school; 2) the school’s waitlist did not contain any District residents; 3) the non-resident’s parent, custodian, guardian, or other primary caregiver submitted a signed, notarized Tuition Agreement; and 4) the

¹⁹ Source: OIG analysis of agency policies and procedures, official forms, and interviews with relevant OSSE and DCPS employees, 2019.

²⁰ Non-resident tuition payments accrue to OSSE’s Residency Verification Fund, which “shall be used solely to fund enforcement activities concerning student residency and primary caregiver status verification.” D.C. Code § 38-312.02

endorser of the Tuition Agreement paid non-resident tuition at the rate set by the Uniform Per Student Funding Formula (UPSFF).²¹

By signing the Tuition Agreement, the endorser acknowledges the student referenced in the agreement resides outside the District and accepts responsibility for paying the required tuition. The endorser also acknowledges that a delinquent account (90 days or more) may subject the referenced student to exclusion from attending a District public school in the current and/or subsequent school years.²²

OSSE reviewed the submitted Tuition Agreements for completion, sufficiency, and validity. To approve an agreement, an OSSE official was required to print and sign his/her name and date it. Lastly, OSSE must receive an initial payment toward tuition before the non-resident student is allowed to enroll in the District public school.²³

FINDINGS

For SY 2018-2019, OSSE, DCPS, and Duke Ellington collectively improved administration of the student residency verification and tuition agreement and payment processes compared to the issues raised in OSSE's Duke Ellington Report related to the SY 2017-2018. Despite these improvements, the OIG identified other areas where actions are needed to further strengthen processes. This report acknowledges the changes and improvements made by OSSE, DCPS, and Duke Ellington; discusses other areas of concern related to compliance with District laws and internal control standards; and provides five corresponding recommendations.

DCPS and Duke Ellington Improved Internal Controls Pertaining to Student Resident Verification Processes but there are Additional Opportunities for Improvement

The OIG identified that DCPS and Duke Ellington implemented improvements to previous practices regarding the student residency verification process. These improvements are discussed in greater detail below:

DCPS and DESAP executed an updated Memorandum of Agreement – For nearly two decades, Duke Ellington's public-private partnership with the District was governed by an MOA dated September 5, 2000 (MOA 2000). Most of the document focused on funding terms, but the MOA did describe the general responsibilities of DESAP and the District. For example, the MOA granted DESAP the sole authority to recruit, hire, and remove a Head of School, but reserved approval rights to the State Superintendent. The MOA 2000 did not address student residency or tuition collection processes. On January 17, 2019, during the OIG's evaluation, DESAP and

²¹ The UPSFF is the formula used to determine and allocate funds from the District's General Fund to support public (and charter) schools in the District. *See* D.C. § 38-2901(8); *see also* D.C. § 38-1804.01.

²² OSSE's Tuition Agreement also notes that failure to adhere to the terms and conditions may result in a referral of the case to the D.C. OAG.

²³ Tuition could be paid either in full or on a monthly or quarterly basis as determined by the endorser and selected on the Tuition Agreement.

DCPS executed a new MOA (MOA 2019), as part of an identified task on DCPS's Corrective Action Plan that was put in place prior to the start of this OIG evaluation. The MOA 2019 clarifies the relationship, roles, and responsibilities between DCPS and DESAP. It also includes new language focused on the student residency verification process. For example, Duke Ellington agreed to create an Enrollment Team of at least four individuals to verify residency. Ellington also agreed to participate in monthly mock audits to prepare for OSSE's Annual Enrollment Audit. In return, DCPS reserved the right to review and approve training materials distributed to Duke Ellington employees and agreed to train Duke Ellington employees on District laws, regulations, policies, and procedures for which the staff member has a role, responsibility, or obligation to implement or ensure compliance.

DCPS and DESAP agreed to an independent review of Duke Ellington's operations – The MOA 2019 also specifies that DCPS and DESAP agreed to an independent review of Duke Ellington's school operations and DESAP's managing body. In February 2019, Duke Ellington received a proposal from an independent accounting and consulting firm outlining a plan to “validate the School's adherence to operational policies, procedures, and compliance requirements.” More specifically, the proposal's scope of services addressed reviewing and assessing various operational areas, including but not limited to: organization management (e.g., articles of incorporation, bylaws, and Board adopted policies and resolutions); Duke Ellington's Employee Handbook; and its Student Handbook, “to gain an understanding of the policies in place, the operational and compliance requirements of each, and the documentation maintained by the School to support such policies.”²⁴ The proposal included an estimated date of completion, subject to approval, of June 30, 2019.

Duke Ellington improved its maintenance and organization of student records – OSSE policies require each school to organize residency verification forms alphabetically by last name into binders with supporting residency documentation immediately behind the DCRV. For SY 2018-2019, Duke Ellington stored a hard copy of each student's enrollment packet in a binder. Students who claimed District residency had an additional binder, which stored their DCRV and supporting documentation. All files were kept inside clear protection sheets, organized alphabetically by last name. As a result of these improved efforts to organize student records, Duke Ellington performed better than most other DCPS schools during OSSE's Annual Enrollment Audit for the SY 2018-2019, according to several interviewees at OSSE, DCPS, and Duke Ellington.

DCPS and Duke Ellington have improved the processes for verifying student residency and the system of internal control, including updating the nearly two-decade old agreement to better document responsibilities for verifying student residency, and agreeing to a management review

²⁴ With regard to its review of the Student Handbook, the firm stated “the existence of policies most notable to the engagement” would include processes for student selection and admission, and student residency verification. Other services addressed in the proposal included an assessment of Duke Ellington's fundraising practices and procurement process.

by an independent third-party. Duke Ellington’s improved performance during OSSE’s Annual Enrollment Audit for SY 2018-2019 is notable; however, the OIG has identified other weaknesses in its admissions and enrollment processes, which are discussed in detail below.

Duke Ellington’s admission policies/procedures did not implement the DCMR requirement that a resident student shall have priority over a non-resident student.

Title 5A DCMR § 5001.2 states a “resident student shall have priority over a non-resident student seeking admission to a District public school,” and as recognized by State Superintendent Hansuel Kang, “District of Columbia schools must be accessible first to District families.”²⁵ Therefore, under OSSE policies, a non-resident student can only enroll in a District public school if the waitlist for the desired school is first cleared of District residents.²⁶

For SY 2018-2019, Duke Ellington did not use a waitlist as part of its admission process.²⁷ As a selective high school, Duke Ellington offers admission to students based on specific requirements and selection criteria, including auditions and family interviews. Duke Ellington applicants are either offered admission or not – no applicants are waitlisted. Interviewees from Duke Ellington, DCPS, and OSSE noted that despite not using a waitlist, the number of non-resident students that Duke Ellington could accept was limited to a maximum of ten percent of its total student body. While such a restriction would cap the number of non-resident students at Duke Ellington (but not prioritize the admission of resident students over non-resident students), the OIG found nothing in writing to support interviewees’ statements about the ten-percent restriction. Interviewees indicated the ten-percent restriction was contained in the MOA 2000,²⁸ but the OIG verified neither the MOA 2000 nor the MOA 2019 contained any language regarding a ten-percent cap on the enrollment of non-residents. The ten-percent restriction remains unconfirmed. OSSE’s Enrollment Audit for SY 2018-2019 identified 545 students at Duke Ellington; 47 of the 545 students enrolled (8.6 percent) were tuition-paying non-resident students.

The OIG’s other concern, in addition to prioritizing admission of District resident students, relates to maximizing the use of District resources to benefit resident students. Consider a scenario: If Duke Ellington has 100 open seats and 120 students are offered admission, but only 90 students accept the admission offer, 10 seats would need to be filled for the school to operate at capacity. Because Duke Ellington does not maintain a waitlist of qualified students, the process for ensuring Duke Ellington enrolls as many District resident students as capacity allows is not clear.²⁹

²⁵ <https://dc.gov/release/osse-uncovers-suspected-residency-fraud-review-school-enrollment-records> (last visited May 21, 2019).

²⁶ DCPS’s Enrollment and Lottery Handbook for the SY 2018-2019 notes that “[w]aitlists reflect the order in which students would be enrolled at a school if seats become available.”

²⁷ Interviewees indicated Duke Ellington has not used a waitlist during its admission process for several school years; however, the OIG’s evaluation is limited to the SY 2018-2019.

²⁸ Article IV, Section 4.2.1 of the MOA 2000 states, “[n]onresident students may be admitted to DESA on a space-available basis and shall pay tuition to the DCPS to attend DESA at a rate established by the DCPS.”

²⁹ The OIG’s analysis is limited to residency considerations only and acknowledges that there are other factors that may cause Duke Ellington to operate under capacity (e.g., recruitment, student interest, general awareness).

Although Duke Ellington is a selective school that determines its own admissions requirements to uphold the quality of its arts program, the DCMR and OSSE policy require District public schools to prioritize District resident students over non-resident students for available seats. One possibility to ensure District resident students receive priority over non-resident students for available Duke Ellington seats is to afford District students preference points during Duke Ellington’s application process in a manner similar to the District government hiring process.

We recommend Duke Ellington; the Chancellor, DCPS; and the State Superintendent, OSSE:

1. Develop application and admissions policies for Duke Ellington that implement 5A DCMR § 5001.2 and aim to admit as many District resident students as capacity allows.

Agree _____ X³⁰ _____ Disagree _____

***OSSE’s September 2019 Response to Recommendation 1:**³¹ Application and admission policies are developed and administered by each LEA. OSSE will continue to provide guidance and technical assistance to all LEAs including DCPS in properly conducting residency verification processes as part of their enrollment procedure, which include application and admission.*

***DCPS’ September 2019 Response to Recommendation 1:** While regulations and application/admission policies are clear for schools that qualifying District residents should be prioritized first and foremost, there are opportunities for DCPS to be more explicit in its standard operating procedures and guidance documents to ensure that the expectation with the school and the public is clear. Currently, the school does not rank non-residents over qualifying District residents. DCPS is committed to working with the school to ensure transparency in how we determine eligibility for all applicants. DCPS commits to the following by March 2020:*

- *Development of detailed standard operating procedures for the admission process that include the creation and development of waitlists and ensure that qualifying District residents have priority over non-resident students.*
- *Development of public facing admissions rubrics on how eligibility decisions are made.*

Language on the District of Columbia Residency Verification Form (DCRV) could be clarified.

The DCRV is included in the Enrollment Packet that students receive upon being offered admission to a District public school. The student’s family must submit a completed DCRV. The DCRV requires the contact information, including physical District address, of the individual claiming to be the student’s parent, guardian, or other primary caregiver. The information provided on the DCRV, and the supporting documentation, form the basis for

³⁰ OSSE did not indicate “agree” or “disagree;” DCPS noted its agreement.

³¹ OSSE’s and DCPS’ complete responses to the draft report are in Appendix E.

claiming District residency. The OIG analyzed the DCRV used during SY 2018-2019, attached as Appendix C, for potential areas of improvements and noted the following:

The DCRV did not define key terms found in D.C. Code – For the purposes of determining student residency, D.C. Code § 38-301 defines the terms: (1) parent; (2) custodian; (3) guardian; and (4) other primary caregiver. The DCRV did not provide D.C. Code definitions for any of these terms.³²

The DCRV did not state documentation was required to establish status as an “other primary caregiver” – D.C. Code § 38-310(a) provides “[a] person seeking to enroll a student as an other primary caregiver shall provide documentation that establishes his or her status as an other primary caregiver in conjunction with documentation that establishes the caregiver’s residency status” The DCRV did not include this language.

The DCRV was not required for all students – only those claiming District residency – OSSE’s 2018-2019 Enrollment Audit and Child Count Handbook states, “all enrolling families and/or adult students are required to submit a DCRV Form 1 and the required supporting documentation.” However, students who self-identified as non-residents of the District were not required to submit DCRVs. Instead, it is *implied* that students whose records do not contain DCRVs are non-residents. The issue with this implication is that students who do not have DCRVs because they are non-residents cannot be distinguished without further inquiry (i.e., checking for active Tuition Agreements on record) from those who do not have DCRVs because they never submitted one. To maintain consistency within student records, the DCRV should be revised to include an option for students to indicate that they are self-identifying as “non-resident.”

The aforementioned items should be incorporated into the DCRV to increase the user’s general understanding of relevant District laws and regulations. The information provided on DCRV forms the basis for claiming District residency, false statements, misrepresentations, and/or omissions on these forms could subject the signor to serious penalties under D.C. Code § 38-312 for knowingly providing false information. Therefore, it is important the DCRV clearly cite definitions and other information from District laws and regulations related to residency to improve clarity of the DCRV’s terms, conditions, and potential penalties.

We recommend the State Superintendent, OSSE:

2. Revise the District of Columbia Residency Verification Form to include: 1) definitions for the terms “parent,” “guardian,” “custodian,” and “other primary caregiver,” as defined by D.C. Code § 38-301; 2) language requiring documentation to establish status as an “other primary caregiver,” as required by D.C. Code § 38-310(a); and 3) an option to indicate the student self-identifies as a non-resident.

Agree _____ X _____ Disagree _____

³² Furthermore, the DCRV does not use the term “custodian” at all.

OSSE’s September 2019 Response to Recommendation 2: *In fact, OSSE has already partially implemented this recommendation. The District of Columbia Residency Verification form (DCRV) is updated each year with new versions released in the month of March preceding the intended school year. Language requiring documentation to establish status as an other primary caregiver was one of many changes made to the 2019-20 school year DCRV (released in March 2019). OSSE engaged the The Lab @ DC to enhance the DCRV for better comprehension and user experience. Similarly, the other primary caregiver form also received extensive edits. Updates included additional guidance on the definition of another primary caregiver, a checklist for school officials to complete in order to confirm other primary caregiver status, and an enhanced layout for a better user experience. Both forms are attached in Appendix 1.*

The next DCRV form will be released in March of 2020 for the 2020-21 school year and will contain the two other recommended changes:

- 1. Definitions for parent, guardian, custodian, and other primary caregiver will be added to the DCRV form. The definitions used are those defined in 5-A DCMR § 5099; and*
- 2. An option to identify as a non-resident student.*

OSSE Developed an Online Application to help Manage the Tuition Payment Process; However, Other Internal Controls Could be Strengthened

OSSE’s Enrollment and Residency Department (OER) worked with its Data Assessment & Research Department (DAR) to develop an online tuition management application that would serve as the centralized database for storing student records, including Tuition Agreements, and standardize the process of managing tuition payments. OSSE launched this application in April 2019; however, OSSE informed the OIG in July 2019 that it was still implementing additional enhancements. OSSE did not provide the OIG with an anticipated completion date for finalizing the additional enhancements but anticipates using the application for SY 2019- 2020. Despite OSSE developing a new application, our evaluation identified several weaknesses within current internal controls.

OSSE did not have documented policies, procedures, or written directives for verifying Tuition Agreements and managing tuition payments.

According to Section OV4.08 of the U.S. Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government* (known as the Green Book),³³ “[d]ocumentation is required for the effective design, implementation, and operating effectiveness of an entity’s internal control system.” Principle 3.10 of the Green Book explains that documentation “provides a means to retain organizational knowledge and mitigate the risk of having that knowledge limited to a few personnel, as well as a means to communicate that knowledge as

³³ Per GAO: “The Green Book may be applied as a framework for an internal control system for state, local, and quasi-governmental entities, as well as for not-for-profit organizations.” U.S. GOV’T ACCOUNTABILITY OFFICE, GAO-14-704G, *supra* note 1, § OV4.10.

needed to external parties, such as external auditors.” Therefore, the Green Book requires management to develop and maintain documentation of responsibilities and internal controls of the organization that meets operational needs.³⁴

For SY 2018-2019, OSSE did not have written standard operating procedures (SOPs) for reviewing and verifying Tuition Agreements, or collecting and tracking tuition payments. Furthermore, one employee was solely responsible for these duties. In the absence of written SOPs, the OSSE employee relied on his/her professional judgement, work experience, and institutional knowledge to manage Tuition Agreements and the tuition payment process. For example, the OSSE employee decided an Excel Spreadsheet was the best platform to manage tuition payments in the SY 2018-2019 because he or she used Excel Spreadsheets in the prior school years. The OSSE employee also completed tasks such as reviewing bank statements; accounting for payments received; calculating outstanding balances; and entering payment updates into the Excel Spreadsheet.

In response to a separate OIG audit published in April 2018, OSSE anticipated it would finalize new policies and procedures for the tuition collection process by April 30, 2018, and a Handbook for the OER would be released at the beginning of the SY 2018-2019.³⁵ Neither task was completed by the anticipated date. OSSE employees explained that the OER experienced organizational changes and transitions, which halted progress with developing written SOPs. For example, roles and responsibilities changed within the OER when it received a new Director in November 2018 and added two new positions to the department. The development of the new online tuition application further complicated the task of documenting processes because the success of the application would substantially affect the current procedures.

On June 29, 2019, OSSE informed the OIG that the SOPs for its tuition collection process as well as the OER Handbook were awaiting review and approval by its General Counsel. OSSE did not provide an anticipated date of completion. Without documented SOPs, OSSE appears to be relying on staff members’ professional judgement to ensure tuition is collected accurately and timely.

We recommend the State Superintendent, OSSE:

3. Implement internal written policies and/or procedures for 1) managing tuition payments that reflect updated processes; and 2) reviewing and analyzing Tuition Agreements for sufficiency and completion prior to allowing non-resident students to enroll in District public schools.

Agree X Disagree

OSSE’s September 2019 Response to Recommendation 3: In fact, OSSE has already fully implemented this recommendation. OSSE has completed a tuition collection

³⁴ *Id.* Principles 3.09, 3.11, and 12.02.

³⁵ *District of Columbia Public Schools and Office of the State Superintendent of Education: The District Lacked Control Activities over Student Residency Verification and the Collection of Non-resident Tuition* (OIG Project No. 17-1-16GA).

standard operating procedure manual that details all policies and procedures for issuing tuition agreements and collecting tuition payments. Starting in the 2019-20 school year, OSSE utilized SeamlessDocs - a third party document collection platform – for distributing and collecting all non-resident tuition agreements. This platform allowed for electronic distribution and collection of the tuition agreements, removal of handwritten agreements, and an expedited process for completing the agreements by both non-resident families and OSSE. Errors in the agreements were spotted quickly by OSSE staff and could be referred back to non-resident families to be addressed.

The updated process and new platform require the Director of Enrollment and Residency to create the agreement and a final review of the completed agreement by both the Tuition Collection Analyst and the Director. There are now two points for the Director to review the eligibility of the non-resident family, as well as a secondary reviewer. In addition, OSSE worked closely with LEAs as early as March of 2019 to make sure that LEAs understood that a non-resident was not eligible to attend school until the LEA received notification from OSSE. LEAs were also instructed to notify OSSE when they intended to enroll a non-resident student as well as instruct the non-resident parent to contact OSSE. With two parties responsible for contacting OSSE, all non-residents could be identified and engaged earlier in the enrollment process. These two changes ensured that no non-residents started school in the 2019-20 school year without a signed agreement and initial tuition payment.

Lastly, while some non-resident students began the 2018-2019 school year without completed tuition agreements, all non-resident students were ultimately held accountable for completing the agreement and paying tuition in full or were excluded and notified as ineligible for the following school year.

OSSE allowed non-resident students with incomplete Tuition Agreements to enroll in Duke Ellington for SY 2018-2019.

OSSE policies require non-resident students to have a signed and notarized Tuition Agreement filed with OSSE prior to enrolling in a District public school.³⁶ In December 2018, OSSE provided the OIG with 53 Tuition Agreements from Duke Ellington for the SY 2018-2019.³⁷ OSSE's Tuition Agreement used during the SY 2018-2019 is attached as Appendix D. An analysis of these Tuition Agreements identified missing information. Specifically, the OIG identified the following deficiencies:

³⁶ See OSSE website, available at <https://osse.dc.gov/page/office-enrollment-residency#residency>. (last visited 08/02/2019).

³⁷ OSSE provided the OIG with 57 Tuition Agreements in total, but 4 were for non-resident students enrolled at other District schools outside of Duke Ellington. Additionally, the total number of Tuition Agreements OSSE provided the OIG differed from the total number of non-resident students at Duke Ellington indicated on OSSE's Enrollment Audit for the SY 2018-2019. When asked to reconcile the difference in the number of non-resident students, OSSE reasoned that the date it conducted its audit and the date it submitted the Tuition Agreements to the OIG were different. Therefore, the total number of non-resident students may differ depending on when the count is taken.

Forms lack required approval – An OSSE official is required to approve the Tuition Agreement and certify approval by printing and signing his or her name and dating the document. There were two Tuition Agreements that did not contain a date, printed name, or signed name of an OSSE official. There was also one Tuition Agreement with an OSSE official’s name printed without a signature or date.

Missing notary information – Section V of the Tuition Agreement required the parent, guardian, custodian, or other primary caregiver to have the Tuition Agreement notarized; however, five Tuition Agreements were not notarized. Three additional Tuition Agreements contained the notary’s signature, date, and location but did not contain a notary seal. Maryland and D.C. require the public notary to complete the notarial transaction by affixing the notary seal on the document.³⁸ Based on the geographical location provided on these three Tuition Agreements with missing notary seals, the notarial transactions were conducted in either D.C. or Maryland. Without a notary seal, the notarization on these three Tuition Agreements may not be valid.

Missing contact information for the primary responsible party – Section II of the Tuition Agreement requires contact information for the party primarily responsible for paying tuition. The requested information includes first and last name, contact telephone number, email address, and home address. There was one Tuition Agreement that did not provide any contact information for the primary responsible party.

Missing signatures for the “other responsible party” – Question 3 under Section II of OSSE’s Tuition Agreement for the SY 2018-2019 asked for the contact information for the “other responsible party.” On the last page of the Tuition Agreement and next to the signature of the primary parent, the person identified in question 3 as the “other responsible party” must also sign his or her name agreeing to the terms and conditions contained therein the Tuition Agreement. The OIG identified seven Tuition Agreements that provided the contact information for the other responsible party, but did not contain an accompanying signature. If the contact information is provided for the “other responsible party,” OSSE must ensure it obtains a signature from such party; otherwise, OSSE may subject the District to greater challenges when attempting to enforce the contract.

OSSE’s lack of documented SOPs for administering Tuition Agreements may have contributed to the acceptance and, in some cases, the verification of incomplete Tuition Agreements. OSSE delegated the task of reviewing and verifying Tuition Agreements to one employee who, in the absence of documented SOPs, applied his or own standards of sufficiency. In the event of non-payment, the District must rely on a Tuition Agreement as its primary basis for enforcing and

³⁸ See OFFICE OF THE SECRETARY OF THE DISTRICT OF COLUMBIA, NOTARY COMMISSIONS AND AUTHENTICATIONS, NOTARY PUBLIC HANDBOOK, § IV, at 10 (Rev. Aug. 2019), available at <https://os.dc.gov/publication/dc-notary-handbook> (last visited Aug. 2, 2019).

See also OFFICE OF THE SECRETARY OF STATE, HANDBOOK FOR MARYLAND NOTARIES PUBLIC, ¶ 22, at 5 (Rev. Aug. 2019), available at <https://os.dc.gov/publication/dc-notary-handbook> (last visited Aug. 2, 2019).

collecting back-tuition payments. To minimize potential enforcement issues when recouping back-tuition payments, OSSE should develop and document a review process to ensure Tuition Agreements are complete, sufficient, and valid *prior* to allowing non-resident students to enroll and attend District public schools.

We recommend the State Superintendent, OSSE:

4. Update the OIG on OSSE's progress toward implementing the new tuition management application into its tuition collection processes by September 30, 2019.

Agree _____ Disagree _____

OSSE's September 2019 Response to Recommendation 4:³⁹ *The tuition management application, internally referred to as the Tuition Payment Application (TPA) was rolled out during the 2018-19 school year. The application was used to assess tuition amounts and store tuition agreements for that school year. During the first implementation of the TPA, a number of enhancements were identified and OSSE is working on those requirements and subsequent developments. OSSE has updated its standard operating procedure manual to reflect this change in process. This manual will be updated when the TPA is re-introduced after the enhancements are completed. For the 2019-20 school year, the SeamLessDocs platform referenced in response to Recommendation 3 is used to track and store agreements during the school year. These agreements are also saved in PDF format on OSSE agency drive for record retention. In addition, payments are tracked through the DirectBiller electronic payment portal as well as an internal accounting spreadsheet. Each month, payments are reconciled with the Office of the Chief Financial Officer.*

For the 2018-19 school year, the total amount of tuition assessed was \$687,849.43. As of July 31, 2019, OSSE collected \$659,159.15 resulting in an outstanding balance of \$28,690.28. As a point of comparison, under the old structure, as of June 1, 2017, OSSE only had collected \$23,423 out of the \$564,526 owed.

OIG Comment: Although OSSE did not agree or disagree with the OIG's recommendation, it appears that efforts planned and/or underway meet the intent of the recommendation.

OSSE's Tuition Agreement form for SY 2018-2019 did not document the student's enrollment date.

The UPSFF determines the total tuition costs for the SY, but the actual tuition amount owed is calculated based on the number of days the non-resident is enrolled in the school.⁴⁰ For

³⁹ OSSE did not indicate "agree" or "disagree."

⁴⁰ Section IV, question 8 on OSSE's Tuition Agreement Form used during the SY 2018-2019 stated "only the actual days of enrollment at the calculated daily rate as approved by OSSE will be charged." See also 5A DCMR § 5014.4, stating tuition rates "may be pro-rated to reflect the portion of the school year during which the non-resident student will be enrolled."

example, a student who transfers to Duke Ellington in the middle of the school year, while rare, would only owe half the total tuition fee. Conversely, if a student who transfers out of Duke Ellington before the end of the school year would only owe tuition up to the day he or she disenrolled.

An OSSE employee noted challenges with calculating pro-rated tuition rates for non-resident students entering a District public school in the middle of the school year because Tuition Agreements did not bear an enrollment start date. Without this information, it would be difficult for current (and future) OSSE employees, auditors, and/or oversight agencies to determine the amount of tuition fees owed to the District for the support of a non-resident student attending a District public school.

We recommend the State Superintendent, OSSE:

5. Revise the Tuition Agreement Form to include the student’s date of enrollment.

Agree _____ Disagree _____

OSSE’s September 2019 Response to Recommendation 5:⁴¹ *Tuition paying non-resident students are required to complete the tuition agreement and make an initial tuition payment before they are eligible to enroll in a District public school. Since this action occurs before the start of school, the enrollment date is not needed on the agreement. In cases where a student enrolls after the start of school, the dates used to calculate the prorated tuition amount are added to Appendix B of the tuition agreement. In cases where the student transitions from resident to non-resident, and is eligible to remain enrolled, the dates used to calculate the prorated tuition amount are added to Appendix B of the tuition agreement. In all cases, the agreement’s Appendix B can be updated to reflect changes in enrollment. This specific design change allows the agreement to be updated as needed, and not just when enrollment and residency status changes, but also if the educational services the student receives change (for example, receipt of special education or English language services). A copy of the new tuition agreement is attached in Appendix 2.*

OIG Comment: Although OSSE did not agree or disagree with the OIG’s recommendation, it appears that efforts planned and/or underway meet the intent of the recommendation.

CONCLUSION

OSSE, DCPS, and Duke Ellington’s corrective actions have strengthened the student residency verification and tuition collection processes, but other areas of improvement remain. Because of the complexity of verifying residency and the severity of the consequences on students for the non-compliance of residency requirements, we encourage OSSE, DCPS, and Duke Ellington to address these issues to further strengthen the internal controls within these processes with the

⁴¹ OSSE did not indicate “agree” or “disagree.”

overall goal of prioritizing District residents over non-residents and protecting District resources from potential waste.

APPENDIX A. OBJECTIVES, SCOPE, AND METHODOLOGY

The objective of this evaluation was to assess: (1) the residency verification process to determine if there are sufficient internal controls to prevent incorrect student residency classification; and (2) the tuition agreement and payment process for non-resident students. The scope of this evaluation was limited to Duke Ellington and covered SY 2018-2019.

During this evaluation, the OIG researched relevant regulations related to student residency and tuition requirements in the D.C. Code and D.C. Municipal Regulations (DCMR). The OIG also read publicly available information (e.g., news articles and agency websites), and reviewed documentation provided directly from OSSE, DCPS, and Duke Ellington including: 2 Memoranda of Agreement; 2 contracts between the District and audit firms; 53 tuition agreements for non-resident students at Duke Ellington for the SY 2018-2019; training material used by OSSE, DCPS, and Duke Ellington in preparation for the SY 2018-2019; and the Excel workbook used to track tuition payments for the SY 2018-2019. Lastly, the OIG interviewed, both in-person and over the phone, OSSE, DCPS, and Duke Ellington employees who were involved in enrollment to learn more details concerning the student residency verification and/or tuition agreement and payment processes. Most of our fieldwork was conducted between December 2018 and March 2019.

APPENDIX B. ACRONYMS AND ABBREVIATIONS

BOD	Board of Directors
DAR	Office of the State Superintendent of Education, Data Assessment & Research Department
D.C.	District of Columbia
DCMR	District of Columbia Municipal Regulations
DCPS	District of Columbia Public Schools
DCRV	District of Columbia Residency Verification Form
DESAP	Duke Ellington School of the Arts Project
FERPA	Family Educational Rights and Privacy Act of 1974
GAO	Government Accountability Office
LEA	Local Education Agency
MOA	Memorandum of Agreement
OAG	District of Columbia, Office of the Attorney General
OER	Office of the State Superintendent of Education, Office of Enrollment & Residency
OIG	Office of the Inspector General
OSSE	Office of the State Superintendent of Education
SOP	Standard Operating Procedures
SY	School Year
UPSFF	Uniform Per Student Funding Formula
USC	United States Code
CFR	Code of Federal Regulations

APPENDIX C. DISTRICT OF COLUMBIA RESIDENCY VERIFICATION FORM FOR SY 2018-2019

Page 1 of 2
SY 2018-19 | Updated 3/18

 Name of LEA/School

FORM 1 - DC RESIDENCY VERIFICATION FORM

Part A. Parent/Guardian/Caregiver or Adult Student Confirmation

I am the parent/guardian other primary caregiver adult student who is re-enrolling* is enrolling _____ in school.
 (Adult Student/Student Full Name)

I, the parent/guardian/caregiver or adult student, affirm that I reside at the following address:

_____ Street _____ City, State _____ Zip Code

**Re-Enrolling can only be selected if all four items in Part B are applicable.*

Part B. Statement of Consent (this section is for enrolling persons who verify District residency using an intra-agency agreement).

Enrolling person must initial all four statements and identify which intra-agency data sharing process is used for residency verification.

<input type="checkbox"/> I hereby affirm that the enrolling school/LEA verified my residency during the previous school year; <input type="checkbox"/> I hereby affirm that I continue to live in the District as I did in the previous school year; <input type="checkbox"/> I hereby consent to random verification of my residency status during this school year;	<input type="checkbox"/> I hereby appoint OSSE as the representative authorized to verify student's residency through an interagency data-sharing process with either: (select one below) <input type="checkbox"/> Department of Human Services to verify participation in any District of Columbia financial assistance or public benefits program; or <input type="checkbox"/> Office of Tax and Revenue (OTR) to verify taxpayer status.**
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***Enrolling person must log in to separate residency validation system through OTR. Enrolling school will provide guidance documents.*

Part C. Parent/Guardian/Caregiver or Adult Student Sworn Statement of DC Residency

I understand that enrollment of the above named student in District of Columbia public schools, public charter schools, or other schools providing educational services funded by the District of Columbia is based on my representation of bona fide DC residency, including this sworn statement of physical presence and my presentation of residency verification documentation. If this sworn statement is false, I understand that I am liable for payment of retroactive tuition for the student, and that the student may be withdrawn from school. Additionally, I understand that, under D.C. Code §38-312, any person who knowingly supplies false information to a public official in connection with student residency verification shall be subject to payment of a fine of not more than \$2,000 or imprisonment for not more than 90 days, but not both a fine and imprisonment. I hereby waive my rights to confidentiality of information relative to my residence and understand that the District of Columbia will use whatever legal means it has at its disposal to verify my residence. I also agree to notify the school of any change of residence for myself or the student within three (3) school days of such change.

 (Printed Name of Parent/Guardian/Caregiver or Adult Student) (Phone Number)

 (Signature of Parent/Guardian/Caregiver or Adult Student) (Date)

Part D. School Official Confirmation

The following item(s) selected below are used and/or presented as proof of District of Columbia residency. See reverse for detailed descriptions.

1. One of the following items: <input type="checkbox"/> Pay stub within 45 days. <input type="checkbox"/> Unexpired official documentation of DC Government financial assistance. <input type="checkbox"/> Certified copy of DC Tax Form-D40. <input type="checkbox"/> Military housing orders. <input type="checkbox"/> Embassy letter.	3. No supporting documentation required. A signature is required by enrolling person in Part C. <input type="checkbox"/> There is evidence that the student is homeless and the homeless liaison has provided homeless verification. <input type="checkbox"/> Child is/was a ward of the District of Columbia.
2. Two of the following items with matching names and addresses: <input type="checkbox"/> Unexpired DC motor vehicle registration. <input type="checkbox"/> Unexpired DC driver's license or non-driver ID. <input type="checkbox"/> Unexpired lease with separate proof of payment. <input type="checkbox"/> Utility bill with separate proof of payment.	4. Select if District residency was verified via intra-agency agreement. <input type="checkbox"/> Office of Tax and Revenue verification.** <input type="checkbox"/> DC financial assistance verification.
	5. Use only if none of the previous options apply. <input type="checkbox"/> The person enrolling the student or the adult student has consented to a home visit.

I certify, under the penalties of perjury, that I have personally reviewed all the documents presented and affirm that the information represented above is true to the best of my knowledge, information, and belief. I also affirm that all supporting documentation to this form will be retained by the school and made available to OSSE, external auditors, and other agencies including but not limited to the DC Office of the Inspector General, DC Office of the Attorney General, etc. upon request.

 School Official (Print) School Official (Signature) Date

APPENDIX C. DISTRICT OF COLUMBIA RESIDENCY VERIFICATION FORM FOR SY 2018-2019

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SY 2018-19 | Updated 3/18

Name of LEA/School

Acceptable Supporting Documentation Checklist

1. (One item is needed from this list to verify residency. The address and name on each of the items must be the same.)

- Pay stub:** A valid paystub issued within forty-five (45) days of providing proof of residency. Must contain the name of person enrolling the student or the name of the adult student showing his/her current DC home address, and withholding of only DC personal income tax for the current tax year.
- Unexpired official documentation of financial assistance from the Government of the District of Columbia:** Issued to the person enrolling the student or the adult student and current at the time presented to the school, including, but not limited to, Temporary Assistance for Needy Families (TANF), Medicaid, the State Child Health Insurance Program (CHIP), Supplemental Security Income, housing assistance or other programs.
- Certified copy of Form D40:** Certified by the DC Office of Tax and Revenue, with the name of person enrolling the student or the name of the adult student as evidence of payment of DC taxes for the current or most recent tax year.
- Current Military housing orders:** Showing the name of the person enrolling the student or the name of the adult student, and the residing District address, including but not limited to a DEERS statement or other official communication on military letterhead.
- Embassy letter:** Issued within the past twelve (12) months showing the name of the person enrolling the student or the name of the adult student, indicating that the caregiver and the dependent student or the adult student currently live on embassy property in the District of Columbia or will reside on DC property confirmed by the embassy during the relevant school year, and an official embassy seal.

2. (Two items are needed from this list to verify residency. The address and name on each of the items must be the same.)

- Valid and unexpired **DC motor vehicle registration** showing the name of the person enrolling the student or the name of the adult student and his/her current District home address.
- Valid and unexpired **lease or rental agreement with a separate proof of payment of rent**, in the name of the person enrolling the student or the name of the adult student, for a period within two (2) months immediately preceding the school's review of residency documentation, for the current DC address at which the student actually resides.
- Valid and unexpired **DC motor vehicle operator's permit or official government issued non-driver identification** in the name of the person enrolling the student or the name of the adult student showing his/her current DC home address.
- Utility bill (only gas, electric, and water bills are acceptable) with a separate paid receipt showing payment of the bill**, from a period within the two (2) months immediately preceding the school's review of residency documentation, listing the name of the person enrolling the student or the name of the adult student and his/her current DC home address.

3. (No supporting documentation required. A signature is required by enrolling person in Part C.)

- Homeless:** There is evidence that the student is homeless and the school's homeless liaison has provided the appropriate homeless information.
- Ward of the District of Columbia:** Proof that child is a ward of the District of Columbia, in the form of a court order or official documentation from DC Child and Family Services Agency.


4. (enrolling families/students consent to electronic verification of residency.)

- Office of Tax and Revenue:** Re-enrolling families/students agree to verify residency using OTR residency verification process. Enrolling person must login to a separate residency validation system. Guidance documentation provided by the enrolling school.
- DC Financial Assistance:** Participation in the identified District financial assistance or public benefits program in which information is fed directly to OSSE through an intra-agency data sharing agreement. These programs include Medicaid, Supplementation Nutrition Assistance Program (SNAP), or Temporary Assistance for Needy Families (TANF).

Penalty for False Information:

Any person, including any District of Columbia public school or public charter school official, who knowingly supplies false information to a public official in connection with student residency verification shall be subject to charges of tuition retroactively, and payment of a fine of not more than \$2,000 or imprisonment for not more than 90 days, but not both fine and imprisonment, pursuant to the District of Columbia Nonresident Tuition Act, approved September 8, 1960 and amended by the District of Columbia Public Schools and Public Charter School Student Residency Fraud Prevention Amendment Act of 2012 (D.C. Code §38-312). The case of any such person may be referred by the Office of the State Superintendent of Education to the Office of the Attorney General.

APPENDIX D. TUITION AGREEMENT FOR SY 2018-2019


SY 2018-2019 | Updated 8/18

NON-RESIDENT TUITION AGREEMENT FOR SCHOOL YEAR 2018-2019

This agreement outlines the requirements for payment of non-resident tuition to attend a District of Columbia public school pursuant to DC Official Code §38-302 and 5A DCMR §5000, et seq. Tuition is set by the Office of the State Superintendent of Education (OSSE) in accordance with the Uniform Per Pupil Funding Formula, the per pupil facilities allowance for public charter schools and other OSSE-approved allowances as further set forth below.

I. STUDENT INFORMATION:

1. I/We have been advised by the school listed below that tuition is required under DC Official Code §38-302 and 5A DCMR §5013, *et seq.*, for the enrollment and attendance of the following student:

First Name	Last Name	Date of Birth	Unique Student Identifier	
School			Enrollment Date	Grade

II. RESPONSIBLE PARTY CONTACT INFORMATION:

2. Primary Responsible Party

First Name	Last Name	Home Address
Primary Contact Number <input type="checkbox"/> Home <input type="checkbox"/> Work <input type="checkbox"/> Cell ()	Emergency Contact Number <input type="checkbox"/> Home <input type="checkbox"/> Work <input type="checkbox"/> Cell ()	Email Address

Relationship to Student:

Parent Guardian Other Primary Caregiver Adult Student

Other If Other, please explain: _____

3. Other Responsible Party:

First Name	Last Name	Home Address
Primary Contact Number <input type="checkbox"/> Home <input type="checkbox"/> Work <input type="checkbox"/> Cell ()	Emergency Contact Number <input type="checkbox"/> Home <input type="checkbox"/> Work <input type="checkbox"/> Cell ()	Email Address

Relationship to Student:

Parent Guardian Other Primary Caregiver Adult Student

Other If Other, please explain: _____

APPENDIX D. TUITION AGREEMENT FOR SY 2018-2019



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4. I/We acknowledge that the student referenced above resides outside of the District of Columbia at the address listed below:

Street Address:		
City	State	Zip Code

III. TUITION & PAYMENT DETAILS


5. I/We agree to accept the responsibility for the nonresident tuition fees as assessed below.

	Category	Amount
Grade		\$13,003
Special Education Level (if applicable)		
English Learner		
Facilities Fee (for Public Charter Schools only)		
Total Tuition Due for SY2018-19		\$13,003

6. I/We agree to pay the **total tuition** as assessed above based on the payment option chosen below. I understand that all payments are due on the first of each month, but no later than the fifth of each month that payment is due. I also understand that payments for quarterly plans are due on the first of the month of each quarter.

Option	Periodicity	# of Payments	Initial Payment	Other Due Dates	Final Payment
1	One-time	1	Within 10 days of execution	NA	Within 10 days of execution of agreement
2	Monthly	9	August 3, or within 5 days of execution of agreement	First of each month from September through April	April 1 st
3	Quarterly	4	August 3, or within 5 days of execution of agreement	First of November, February, and April	April 1 st

APPENDIX D. TUITION AGREEMENT FOR SY 2018-2019


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IV. ASSURANCES

7. I /We agree to pay the required tuition as specified by the payment option selected above. It is further my/our understanding that if I/we become delinquent by 90 days or more, OSSE may exclude my/our student from attending public school in the District based on non-payment. Additionally, if I /we fail to pay the required tuition as non-residents during the 2018-19 school year, the student referenced above will be excluded from attending public schools within District of Columbia for the subsequent school year.

8. Further, I/we acknowledge that if the student referenced above is withdrawn from the school, only the actual days of enrollment at the calculated daily rate as approved by OSSE will be charged.

X

Signature of Primary Parent/Guardian
Other Primary Caregiver, or Adult Student

X

Signature of Secondary Parent/Guardian
Other Primary Caregiver

Pursuant to 5A DCMR §5000, et seq., FAILURE TO ADHERE TO THE TERMS OF THIS AGREEMENT, shall result in withdrawal of the student from a District public school and, if appropriate, referral of this matter to the DC Office of the Attorney General for collection of all outstanding tuition owed.

V. NOTARY REQUIRED

Subscribed and sworn before me this _____ day of _____, 20____.

(Date) (Month) (Year)

at _____, _____

(City) (State)

(Notary Seal)

(Notary Signature)

Approved by:

OSSE Official Printed Name	OSSE Official Signature & Date
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3

APPENDIX E. OSSE's, DCPS' RESPONSES TO DRAFT REPORT



September 28, 2019

Daniel W. Lucas
Inspector General
717 17th St., NW
Washington, DC 20005

RE: OIG Project No. 12-I-06GD – Draft Report entitled “Office of State Superintendent of Education, District of Columbia Public Schools: Evaluation of Enrollment, Residency Verification, and Tuition Agreement Procedures at Duke Ellington School of the Arts for the School Year 2018-2019”

Dear Mr. Lucas,

This correspondence serves as the Office of the State Superintendent of Education’s (OSSE) response to the Office of the Inspector General (OIG) draft report, *Office of State Superintendent of Education, District of Columbia Public Schools: Evaluation of Enrollment, Residency Verification, and Tuition Agreement Procedures at Duke Ellington School of the Arts for the School Year 2018-2019*, dated September 12, 2019. Thank you for providing OSSE an opportunity to review the draft report and provide responses to the recommendations.

OSSE remains committed to ensuring District schools remain accessible first and foremost to Washington, DC residents. We will continue to take steps to improve our practice, and look forward to working with schools, families, and the community to further improve our residency efforts. Accordingly, OSSE is pleased to report that most of the recommendations below have already been fully implemented or implementation is underway. OSSE has spent the last year working closely with the LEA and Duke Ellington School of the Art’s families to improve the processes for both resident and non-resident students. While we continue to improve the process, enrollment for the 2019-20 school year has been the most efficient to date, resulting in all non-resident families completing agreements and initial payments before starting school and better guidance for the LEA on complex residency verification situations. OSSE has invested significant resources to improve the clarity and rigor of the residency verification, investigation, and tuition collection processes and will continue to do so in the coming years to ensure increased compliance with statutory and regulatory requirements.

OSSE’s Responses to Recommendations

Recommendation 1:

Develop application and admissions policies for Duke Ellington that implement Title 5-A DCMR § 5001.2 and aim to admit as many District resident students as capacity allows.

OSSE Response:

Application and admission policies are developed and administered by each LEA. OSSE will continue to provide guidance and technical assistance to all LEAs including DCPS in properly conducting