**Rhode Island 21st Century Community Learning Centers (21st CCLC)**

**Program Monitoring Procedures**

**December 2024**

**Rationale**

The Rhode Island Department of Elementary and Secondary Education (RIDE) is required by federal statute and regulation to conduct regular, systematic reviews of subgrantees of the 21st Century Community Learning Center grant to monitor for compliance with federal statutes and regulations and applicable State rules and policies [*Education Department General Administrative Regulations* *(EDGAR)* §76.770, *Uniform Guidance (UG)* §200.332(d), *Every Student Succeeds Act (ESSA)* §4202(c)(3)(A) andother sections]. In addition, RIDE is required to conduct a subgrantee risk review to inform its monitoring strategies [*UG* §200.332(c)].

**Background**

The Rhode Island Department of Education (RIDE) has conducted regular, systematic monitoring of 21st CCLC subgrantees, for both programmatic and fiscal elements of the grant for as long as the grant has been administered by RIDE. RIDE has separate processes for fiscal monitoring of all federal subgrantees, across funding streams. This document focuses primarily on the monitoring of programmatic aspects of the grant. Consistent procedures are needed for managing ongoing desktop monitoring, administering the risk assessment, conducting periodic on-site monitoring, and responding to higher-priority risks.

The goals of RIDE’s 21st CCLC program monitoring are as follows:

1. To ensure compliance with federal and state requirements and minimize the risk of waste, fraud, or abuse
2. To ensure that proposed programs are implemented in accordance with state and federal program expectations
3. To ensure consistent implementation of high-quality programs for children, youth, and families
4. To identify and begin to address the technical assistance, professional development, and quality improvement needs of subgrantees.

Throughout the monitoring cycle, RIDE’s emphasis is on promoting a culture of support.

**Procedures**

**Desktop Monitoring**

1. RIDE 21st CCLC program staff conduct desktop monitoring of all subgrantees on an ongoing, cyclical basis. Desktop monitoring includes, but is not limited to the following:
	1. Reviews of Budget Amendments (if any, all year as received, particularly December-February)
	2. Reviews of Programmatic Amendments to annual plans (if any, all year as received)
	3. Reviews of Rhode Island Program Quality Assessment (RIPQA) reports (if any, all year as received, particularly June-August)
	4. Tracking timeliness of submissions of Financial Status Reports (FSRs) and periodic reviews of FSRs themselves (all year as received, at least quarterly)
	5. Reviews of Annual Progress Reports (August-September)
	6. Reviews of 21APR federal report data submissions (August-September)
	7. Reviews of 21APR federal report data pulled from RIDE’s Data Warehouse (October-March)
	8. Tracking participation in monthly grantee meetings (September-June)
	9. Reviews of Annual Plans and Budgets, including documentation of private school consultation (March-July)
	10. Reviews of other documents as appropriate or as requested by other RIDE offices (all year as requested).
2. RIDE desktop monitoring is informed by email, phone, and in-person communication with subgrantee staff, program partners, and other stakeholders of the grant.
3. Accomplishments, areas of strength, areas of improvement, barriers addressed, innovations, etc. are acknowledged and celebrated and occasionally shared publicly.
4. Where there are risks, challenges, barriers, delays, negative changes, etc. RIDE staff offer support, suggestions, and technical assistance. If appropriate, relevant information may be shared with other RIDE offices, contracted Quality Advisors, the Rhode Island Afterschool Network (RIAN), or other partners who may be able to provide additional technical support.
5. Issues that are common to multiple subgrantees are identified as future technical assistance and professional development needs, which may be shared with the Rhode Island Afterschool Network or other partners who may be able to address those needs.
6. Higher-priority risks (see list below) that are identified through desktop monitoring may trigger a targeted or comprehensive on-site monitoring visit, as well as other steps in the Risk Response Protocol (see below).

**Risk Assessment**

1. Each year, typically in late summer or early fall, RIDE 21st CCLC program staff conduct an assessment of each subgrantee’s level of risk of noncompliance with federal and state requirements and expectations, in accordance with the original intent of the grant.
2. The risk assessment includes, but is not limited to, the following factors, to the extent that information is available:
* Size of grant(s) (i.e., total funding amount, total number of sites)
* Number of recent changes in staffing, particularly in leadership roles
* Any new or substantial changes to administrative systems, grant structure, schools served, or program design
* Level of experience with the 21st CCLC or similar grants
* Timeliness of submission of data, reports, plans, and other documents
* Completeness and quality of data, reports, plans, and other documents
* Presence of any higher-priority risks and concerns identified through desktop monitoring
* Performance or improvement on annual program objectives and/or statewide evaluation indicators and measures
* Length of time since previous on-site monitoring
1. Each risk factor is assigned a numeric value and a total score is calculated for each subgrantee. Subgrantees are then ranked according to their level of risk based on the total score, to help determine which will be selected for on-site monitoring.

**On-Site Monitoring**

1. **Comprehensive vs. Targeted visits.** Most programmatic on-site monitoring visits are *comprehensive*, assessing the following six major components of the grant:
	1. Safety and Environment
	2. Fiscal Management
	3. Governance
	4. Program
	5. School Linkages
	6. Family, Youth, and Community Engagement

Depending on the RIDE fiscal monitoring cycle, in order to avoid duplication and burden, some comprehensive programmatic monitoring site visits only assess limited elements of Fiscal Management.

In some instances, *targeted* on-site monitoring visits are conducted. A *targeted visit* assesses only one or two of the major components – or a subset thereof.

1. **Cycle and subgrantee selection.** RIDE program staff conduct between four and six on-site programmatic monitoring visits each fiscal year. Subgrantees are selected as follows:
	1. A minimum of three visits are with subgrantees whose scores on the Risk Assessment are among the six highest. These are comprehensive visits.
	2. Other visits are at the discretion of RIDE program staff, based on on-site monitoring history, results of desktop monitoring, and other developing needs.
	3. All grantees will undergo on-site monitoring at least once every five years, regardless of risk assessment scores during that period.
2. **Monitoring Tool.** RIDE has a monitoring tool that addresses all six major components of the grant, each of which includes between three and 20 elements to be assessed. For each element, the tool includes:
	1. **Grant Expectation** – a statement of what is expected or required
	2. **Suggested Evidence** – a list of possible types of documents to be kept on file and which may be submitted for monitoring
	3. **Federal or State Statutory Citation** – legal citation(s) if this element is required by law
	4. **Guidance/Resources** – any guidance documents, emails from RIDE, slides from trainings or technical assistance sessions, sample tools, etc. that support subgrantees with implementation of this element.
3. **Pre-visit review of documentation.** Subgrantees are asked to submit documentation to RIDE for review prior to the on-site visit. RIDE also reviews other documents and data already on file. In some instances, RIDE may ask for specific additional documentation, depending on the nature of the visit.
4. **On-site Visit.** The monitoring visit typically takes between one to two full days, depending on whether it is comprehensive or targeted, the size of the subgrant(s), and the number of program sites being included. The visit can be split into smaller time periods, if scheduling requires. Visits consist of:
	1. **On-site meeting(s) with program leaders.** This is the central component of the monitoring visit, where RIDE and program staff go through the major components of the monitoring tool together, discussing specific elements, one at a time. Some elements can be skipped if the documentation provided is sufficiently clear. Subgrantees may be asked clarifying questions about documentation that was submitted pre-visit or asked if additional documentation is available. They may be asked simply to describe how they do things under each element.
	Typically, the meetings are with the program director(s) but they may include other staff with knowledge of the program, such as agency executive staff, grant managers, site coordinators, data staff, etc. It is at the subgrantee’s discretion who attends. The meeting can be split into shorter meetings with different staff, if preferred.
	2. **On-site meeting fiscal staff, if Fiscal Management components are being assessed.** This is similar to the previous item, but also includes RIDE fiscal staff along with program staff.
	3. **Meeting with the principal of the target school.** This is typically short and provides the principal with an opportunity to discuss the afterschool and summer program and how it fits with their goals for the school. This may be scheduled for a separate date, if necessary. The principal may also ask RIDE to meet with their designee.
	4. **Informal program observation.** RIDE staff observe the program from the end of the school day to program dismissal at a single site. The purpose is to see the program in action, confirm that the program is implemented as described in the grant proposal and annual plans, and confirm some elements from the monitoring tool. This program observation is not intended to replace or be the same as a program observation conducted as part of the Rhode Island Program Quality Assessment cycle (a.k.a. “Form A observation”). For some grantees serving multiple age groups or different sites, RIDE may arrange to observe more than one site. All program spaces should be made accessible to RIDE staff, as much as possible, during the visit.
	The program director and/or site coordinator may choose to accompany RIDE staff for part or all of the observation, but it is not required, as long as they make themselves available periodically for questions. RIDE staff seek to minimize disruption during observations but will occasionally ask questions of instructors and program participants. RIDE staff may also ask to see physical evidence of certain monitoring elements (e.g., first aid kits, evacuation routes, labeling of equipment, etc.) during the visit.
	5. **Other elements (optional).** Program leaders are free to add other elements to the visit to showcase their program, such as meeting with the program governance group, meeting with the youth advisory council, attending a program event, etc.
	6. **Debrief.** At the end of the visit – or shortly after the visit – RIDE staff meet with program leaders to debrief the visit and offer general impressions. As part of this, RIDE may ask for additional documentation to be submitted. RIDE staff generally note areas of strength of the program, as well as preview any likely findings of noncompliance, with the caveat that these may change as RIDE finalizes the monitoring report.
5. **Post-visit submission.** Subgrantees may submit additional documentation to RIDE up to two weeks after the site visit.
6. **Monitoring Report.** Following the visit, the sub-grantee will receive a written report outlining the visit results. The site visit monitoring report is sent to the program director, with copies typically sent to the superintendent, principal, and director of the lead community partner agency(ies). In the report, each element reviewed will have one of four results:
	1. **Commendation** indicates an area of demonstrable success.
	2. **Met Requirements** indicates that all required elements are in place.
	3. **Recommendation** indicates an area where the program is in compliance with statutes and regulations, but where there is an issue that could be improved, in the judgment of RIDE staff, based on national and local best practices. Recommendations do not come with required actions, but they do represent areas that should be prioritized for improvement.
	4. **Finding** indicates noncompliance with a specific element of statute or regulations. Each finding will be accompanied by one or more **Required Action(s)** that indicate(s) how the finding must be corrected.
7. **Written response by the subgrantee, if there were any findings in the monitoring report.** The subgrantee must submit a written response within 30 business days from the date that they received the report to address any findings. For each finding, the response should either:
	1. **Rebut the finding.** If the subgrantee does not agree with the finding, they should provide a brief narrative explanation for why they feel RIDE was in error. They may include additional documentation to support this.
	2. **Correct the finding**. If the subgrantee is able to address a finding within the initial 30-business day window, they should provide a brief description of how they did so and provide supporting documentation.
	3. **Note how the finding will be corrected.** If any finding will take longer to correct, the subgrantee should outline their plan, including any action steps and a timeline to be followed.

A written response to any recommendations is welcome but not required.

1. **Amended monitoring report, if any findings are successfully rebutted.** If the subgrantee rebutted any findings and RIDE accepts their reasoning, RIDE will issue an amended monitoring report with that finding changed to Met Requirements or Recommendation. If RIDE does not accept the reasoning, the subgrantee will be notified via email, and the original report will remain.
2. **Clearing monitoring findings, if any remain.** As the subgrantee corrects monitoring findings, they should notify RIDE via email and submit supporting documentation. RIDE then assesses the evidence and notifies the subgrantee via email whether the finding has been cleared or whether additional steps are necessary. Depending on the nature of the finding, RIDE may ask for quarterly check-in meetings to assess progress.
3. **Technical assistance, if desired.** At any point throughout the monitoring process, the subgrantee may request technical assistance and support from RIDE, to help with clearing findings or implementing recommendations.
4. **Final closeout letter.** Once RIDE has received and accepted the subgrantee’s evidence that all findings from the monitoring report have been corrected, RIDE sends a letter formally stating that all findings have been cleared and the monitoring process is closed out. This letter is sent to the same parties that received the monitoring report. If there were no findings in the monitoring report, the cover letter to that report serves as the final closeout letter.

**Risk Response Protocol**

Desktop monitoring, the risk assessment, or on-site monitoring may surface issues which pose a higher level of risk – to the grant and/or to youth, families, or other stakeholders – and which warrant further response from RIDE. This includes issues that are of a more serious nature, multiple co-occurring issues, and issues that the subgrantee has not adequately addressed over time. The intent of the risk response protocol is to provide structure and accountability, with scaffolded support, to mitigate risks.

**Higher-Priority Risks**

The following are considered higher-priority risks:

1. Health or safety risks for students or staff
2. Risk of – or evidence of – waste, fraud or abuse of funds
3. Ongoing conflict between grant partners and/or with stakeholders
4. Evidence of possible criminal activity
5. Organizational instability, inability to meet fiscal obligations, or risk of insolvency
6. Multiple, co-occurring risks or concerns, even if individually they are of a less serious nature
7. Persistent or repeatedly occurring issues
8. Repeated delays or failure to respond to RIDE requests for reports, data, plans, or other information
9. Delayed, inadequate, or lack of response to monitoring findings
10. Failure to meet Grant Award Conditions
11. Continued failure to meet – or make improvement in meeting – grant objectives
12. Failure to implement the grant in accordance with the 5-year proposal and signed Assurances.

**Risk Response Steps**

The following is a non-exhaustive list of steps that may be taken by RIDE – either separate from, or in conjunction with, the monitoring processes outline above – to address higher-priority risks. Although the steps outlined are generally progressive, they are not linear. Steps may occur simultaneously, be skipped, or be repeated as necessary until the situation is adequately resolved. Regular, on-going, respectful, two-way communication is critical throughout these steps.

1. **Targeted Technical Assistance (TA).** Many issues can be resolved with relatively limited involvement from RIDE staff. Targeted TA may include individualized information, feedback, suggestions, resources, trainings, etc. Other RIDE offices, contracted Quality Advisors, RIAN, or other partners who are able to provide additional technical support may be brought in.
2. **Meeting with Program Leaders.** Wherethe issues are enduring, complex, opaque, or involve conflict, an in-person meeting to discuss the situation may be scheduled. Depending on the situation, this may just be with program leaders, it may include executive staff from the fiscal agent, or it may include representatives from the various grant partners. More than one meeting may be needed, either initially or over a period of time. The goal is to clarify the issues, set clear expectations, and plan out steps to be taken and timelines to be followed to resolve the issue(s). A follow-up email is typically sent to summarize the meeting(s).
3. **Follow-up Letter with Timeline of Deliverables.** If no clear consensus was reached in meetings with program leaders, if agreed upon steps are not taken, or if progress is not made according to the agreed upon timeline, RIDE may send a formal follow-up letter to the subgrantee – and possibly other partners. This letter will include a timeline for expected actions and deliverables. Ideally, these have been already agreed upon jointly, but they may be imposed by RIDE staff.
4. **Targeted or Comprehensive Site Visit.** If additional information is needed to assess the nature or scope of the issues, the needs of the program, or barriers to resolution of risks, RIDE may conduct a site visit. This may either be a targeted visit focusing on the specific issues at hand or a comprehensive visit to assess the program as a whole.
5. **Intensive Technical Assistance.** Some situations may require more in-depth or ongoing technical assistance with program leaders. The types of assistance provided are similar to the targeted TA, but the intensity and duration are increased. Additional grant partners may also be included. If funds allow, additional resources could be directed to support the provision of contracted technical assistance.
6. **Corrective Action Plan.** If progress is slow in addressing risks and concerns, additional concerns or risks are identified, or communication with RIDE is limited, RIDE may institute a formal Corrective Action Plan. This document includes a list of required actions, specific milestones and deliverables, and timelines for expected actions. It may also include requirements around periodic reporting, follow-up meetings, and/or timely notification to RIDE about certain actions, milestones, or unanticipated events. It may also include a requirement that the subgrantee repay funds to RIDE for inadmissible expenses.
7. **Grant Award Conditions.** Whenrisks and concerns persist, RIDE may amend the subgrant award to include additional requirements, sometimes called “Special Grant Award Conditions” or “Subaward-Specific Terms and Conditions.” These are similar to the types of items required in a Corrective Action Plan. Grant award conditions may also be implemented together with a Corrective Action Plan.
8. **Delay or Withholding of Funds.** If Grant Award Conditions are not met, this will result in a delay in reimbursements or in the withholding of funds.
9. **Call for Return of Funds.** Ininstances where RIDE disallows expenses that had previously been reimbursed by RIDE, RIDE will call for the return of those funds.
10. **Suspension, Reduction, or Termination of Grant.** If required actions and timelines continue to be unmet or if the situation is critical enough to warrant it, RIDE reserves the right to suspend the grant, reduce the grant award amount, or terminate the grant.

**Ongoing Communication, Monitoring and Follow-up**

Throughout the Risk Response Protocol, RIDE staff will continue to communicate with program leaders on a regular basis and offer feedback, clarification, suggestions, support, and technical assistance. The further along in the progression of steps a situation goes without resolution, the more frequent and more formal communication becomes, and the more other parties are included. Once the situation is adequately resolved, RIDE will continue to track the issues raised via regular monitoring efforts to help ensure that problems do not resurface.