

*Oklahoma State Department of Education
2500 North Lincoln Boulevard
Oklahoma City, Oklahoma*

**Office of Student Support
Title I, IIA, VI and X**

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**Oklahoma State Department of Education
Charter School Policy**

FY2011-2012

The United States Department of Education's *No Child Left Behind Act (NCLB) of 2001*, created stringent accountability requirements through the Title I program when addressing Charter Schools. The manner in which each state implements those requirements is unique to Charter Schools, and varies according to each state's Charter School Law.

In particular, the accountability factors imposed upon Charter Schools through *NCLB's* Title I program were historically challenging, not only for the Charter Schools, but for those entities responsible for ensuring that Charter Schools comply with not only the law, but also the components included within each Charter. (*Charter is actually defined in this writing as the contract containing the obligations and responsibilities of each charter school.*)

The Oklahoma State Department of Education (OSDE) is no stranger to the challenges that local educational agencies have experienced for ensuring that all Charter Schools have met all required and stringent compliance standards contained in the No Child Left Behind Act. The Title I, IIA, VI and X, Child Nutrition, and Special Education offices at *OSDE* have provided professionally sound technical assistance to both Charter Schools and their responsible 'oversight' agencies, such as; local educational agencies or agencies of higher learning. This technical assistance addressed matters pertaining to state and federal requirements. OSDE has ensured that Charter Schools understand that where federal funds are concerned, all matters pertaining to reaching and maintaining compliance standards for the use of these funds will be thoroughly monitored.

For the FY2010-2011 school year, the OSDE implemented new requirements as established through recent legislation regarding Charter Schools. A new Senate Bill was enacted by the people of the State of Oklahoma and signed by the governor on May 4, 2010. This new legislation was to be enacted as of August 27, 2010. The bill included amendments as found on page number 2.

Senate Bill No. 2212:

An Act relating to schools; amending 70 O.S. 2001, Section 3-142, as last amended by Section 4, Chapter 257, O.S. L. 2007 (70 O.S. Supp.2009, Section 3-142), which relates to funding of Charter Schools; establishing certain Charter Schools as local education agencies for certain purposes.

Section 1. Amended to read as follows:

Section 3-142. A. For purposes of funding, a Charter School sponsored by a board of education of a school district shall be considered a site within the school district in which the Charter School is located. (See complete Senate Bill No. 2212 as attached.)

Charter Schools may now be considered as their own local educational agency (LEA) for federal funding purposes, and may receive federal grant funding allocations in the same manner as any local educational agency in this state. It is the responsibility of the OSDE to ensure that the Charter Schools receive appropriate federal funding allocations for the programs in which they are eligible to participate, and to accompany those allocations with all necessary information that will provide the Charters with a clear understanding of federal program requirements. This, of course, is for the purpose of ensuring that Charter Schools not only meet compliance standards for the use of federal funds, but also maintain compliance.

The State of Oklahoma, for the FY2011-2012 school year, includes a total of twenty Charter Schools. The Charter Schools receiving federal funds through Title I, Part A, Title I, Part A, ARRA, Special Education and Child Nutrition programs are considered their own LEA.

County/District	Charter School
1. 11T001	Tsunadeloquasdi Cherokee Immersion
2. 54E001	Epic One on One Virtual
3. 55E011	Santa Fe South Middle School
4. 55E007	Santa Fe South High School
5. 55G001	Santa Fe South Elementary
6. 55E004	ASTEC Middle School
7. 55E004	ASTEC High School
8. 55E002	Justice A. W. Seeworth Academy
9. 55E010	Harding Fine Arts Academy
10. 55E009	Marcus Garvey Leadership Charter School
11. 55E012	KIPP Reach College Preparatory School
12. 55E008	Harding Charter Preparatory High School
13. 55E013	Dove Science Academy Elementary School
14. 55E001	Independence Charter Middle School
15. 55E005	Dove Science Academy
16. 55E003	Stanley Hupfeld Academy at Western Village
17. 55E014	Oklahoma Virtual Academy
18. 72E004	Tulsa School of the Arts
19. 72G003	Discovery Schools of Tulsa
20. 72G001	Deborah Brown Community School

The participating Charter Schools are now required, due to the newly established Charter legislation, to report ‘*directly*’ to the OSDE in all matters regarding receiving and expending federal funds. The OSDE collaborates with Charter Schools by assisting each school in all required processes and procedures that accompany receiving and expending federal funds.

The following OSDE office areas providing information and technical assistance to Charter Schools regarding federally funded programs are included below:

Title I, IIA, VI and X

Title I, IIA, VI and X: This office will provide technical assistance information necessary to effectively submit federal programs applications and expenditure reports. The first Charter School training provided by this office was held on Tuesday, June 8, 2010. The training covered such topics as; requirements of the new Charter School legislation, Schoolwide and Targeted Assistance program planning, federal programs budgets and applications, and information addressing future training opportunities. Charter Schools may contact the following OSDE staff members when making federal programs inquiries:

Ramona Coats, Executive Director of Title I, IIA, VI and X may be contacted for all inquiries regarding Title I, Part A or Title IIA federal programs issues regarding schoolwide plans and consolidated district monitoring at (405) 522-2017.

Gloria Bayouth, Director of Title I, IIA, VI and X may be contacted for issues addressing Charter School claims, MSP Grants, and Private Schools at (405) 522-3249.

This office of Title I, IIA, VI and X will provide information to the Charter Schools regarding important timelines and established due dates.

Federal Programs Application Due Dates and Established Timelines:

Each district receiving federal funds must complete a consolidated application workbook. This is located on the School District Reporting Site. The workbook requires that districts conduct a needs assessment with its schools to determine how funds should best be used to increase student performance in reading and/or math. Once the needs assessment is complete, the district will summarize the results and document how funding will be used to address the five goals of No Child Left Behind. After the workbook is uploaded and certified by the superintendent, a program specialist will review the application for approval. Once approved, the district can download, complete, and submit budget applications for Titles I, IIA, and VI. After the applications are reviewed and approved, the district can begin claiming expenditures.

The following outline demonstrates the yearly application timeline:

- The superintendent agrees to the assurances prior to completing the Consolidated Application Workbook.
- The Consolidated Application Workbook must be completed, uploaded, and certified by the superintendent by June 30.
- Following approval of the Consolidated Application Workbook, the applications for Titles I, IIA, and VI may be downloaded, completed, uploaded, and certified. This may be done up to September 30.
- Once a project application is approved, expenditures from that project may be submitted for reimbursement.

Claims and Expenditure Reporting:

Claims submitted by charter schools are processed in the same manner as claims submitted by non-charter schools. Claims are processed in the chronological order in which they are received. The processing period for claims starts at the beginning of the fiscal year, July 1 once the revised allocation letters are sent to districts. Claims received for districts can only be paid once the

district has a preapproved application for the Title project. Claims received at the beginning of the fiscal year are paid on a sliding scale. If a project is at least in preapproval status, the district can be paid ten percent beginning July 1 through September 30. This increases in ten percent increments through the month of February. Once an application has final approval, the full amount of the allocation may be claimed. Beginning March 1, an application must have final approval to have any claims paid.

The deadline to submit claims to be guaranteed payment within the fiscal year is always set within the first week of the month of June. Claims must be received in the claims office by the end of the business day on this date and be in approval format to be guaranteed payment. Payable format includes: documentation attached, correct coding and adequate funds within claimed function and object codes. The final disbursement for the fiscal year is generally in the last week of the month of June. The final date to submit claims for the fiscal year is generally within the first week of August. Any claims received after this deadline must be submitted to the State Board of Education for approval of payment. Late claims also require a letter from the Superintendent of the district detailing the cause of the delay and any circumstances which are to be considered in the determination of payment. **We do not guarantee payment of late claims.**

ARRA/Consolidated District Monitoring Review Requirements:

EDGAR, Section 80.40, requires OSDE grantees to monitor their subgrantees to ensure compliance with applicable federal requirements, and that performance goals are achieved. Grantees are ultimately responsible for managing the day-to-day operations of all federally funded activities. All LEAs must ensure that all expenditures and activities are indeed allowable, and all areas needing corrective action are addressed and applied. The provision of federal grant monitoring enables state educational agencies to work in close collaboration with LEAs by providing them with high quality technical assistance for fiscal and programmatic planning and implementation of all services provided for students, teachers, and principals, in behalf of their various federally funded programs. Ultimately, it is the primary grantee's responsibility to ensure that federal funds are spent according to the prescribed federal program requirements.

Monitoring is the examination of a district's administration and implementation of a federal education grant to: 1) assure compliance with applicable federal requirements; and 2) that district performance goals are being achieved as stated in Education Department General Administrative Regulations. (*EDGAR Section 80.40.*)

Monitoring supports the alignment of state and local efforts with the principles of NCLB. Monitoring provides the data necessary to make educational improvements and holds districts accountable for ensuring that all students reach proficiency or above in reading and math by 2014. OSDE's monitoring efforts are designed to focus districts' efforts when implementing the critical requirements of NCLB.

OSDE's monitoring process consists of two major components that assist districts in their efforts in building capacity for improved student achievement and ensure program compliance. The Office of Standards and Curriculum Title I, IIA, VI, and X performs the following

- Desk monitoring, and
- On-site monitoring.

OSDE program specialist(s) collect data during the desk and on-site monitoring to determine *compliance* with the monitoring indicators listed in the monitoring notification letter and the monitoring checklist. Monitoring outside of the scheduled cycle may be required if a district has serious or chronic compliance problems or has unresolved issues identified during the monitoring process.

Process Number One: The Desk Monitoring

Each district identified for desk monitoring receives the following items:

- Initial monitoring notification letter
- Monitoring checklist of required forms of documentation
- Monitoring timeline

Each district is assigned to a program specialist who is the district contact, and is primarily responsible for providing technical assistance concerning all monitoring processes. One of the most important functions of the program specialist is organizing the desk monitoring process and performing the appropriate follow-through for each assigned district. Desk monitoring includes an examination of specific program information. In conducting the desk monitoring, the district must complete the following and submit to the appropriate program specialist:

- The local school district should collect and organize all required forms of documentation. They may observe that as they perform this process that all required documents are in place. District personnel should perform a review and analysis of those documents to determine the degree of quality and clarity demonstrated for reaching compliance standards before submitting to OSDE.
- When the district determines the required documents are found to meet compliance standards, they are then prepared to submit the documentation to OSDE.
- In some cases, local school districts may find one or more documents are missing or incomplete; therefore, they should determine how to effectively create or revise the document in a timely manner. At this point, they should determine the process for revision and correction before documents are submitted to OSDE.

Performing the Monitoring of District Information:

OSDE performs the monitoring of district information in the following manner:

- OSDE staff reviews all forms of the required district documentation submitted for the desk monitoring.
- OSDE's review aligns with indicators included within United States Department of Education's Student Achievement and School Accountability (SASA) documents for specific federal program review requirements. This document highly influences the results of the monitoring, and is the model for accountability and transparency.
- OSDE's reviews are detailed, addressing each critical area of the law as required.
- As the review is performed, OSDE staff look for a demonstration of appropriate NCLB processes included within each document submitted; for example, every schoolwide plan should contain **all** of the specific components of a schoolwide plan before the plan can be considered to meet compliance standards.
- Each document reviewed either meets standards, needing no revision, or does not meet standards, and requires some form of corrective action; for example, a school district may distribute the NCLB Report Card to parents by utilizing one method; however, as required by NCLB, they failed to address **multiple** ways of distributing this information.
- OSDE staff provides information about changes in policies and guidance in the form of technical assistance, and identifies potential or existing problem areas.
- OSDE staff performs follow-up after the desk monitoring has been completed.

After the desk monitoring has been performed, the program specialists may offer technical assistance via fax, e-mail, and phone conversations to assist the district in achieving compliance status.

Process Number Two: The On-Site Monitoring

Each district identified for an on-site monitoring receives the following items:

- Initial monitoring notification letter with date of site visit
- Monitoring checklist for required forms of documentation to be monitored
- Monitoring timeline

When conducting the on-site monitoring, the districts need to complete the following processes and have the items prepared and organized for the monitoring:

- Gather and organize all program specific documentation requested in the monitoring notification letter.
- Ensure that the district superintendent or authorized representative be available during the monitoring visit.

During the on-site visit, OSDE program specialists monitor all appropriate documentation including information requested in the monitoring notification letter, and interview district staff, principals, teachers, parents, and other stakeholders, both individually and in groups, as appropriate. This multilevel interview strategy allows the program specialist(s) to gather information from a variety of perspectives and better evaluate the impact of the administration and the implementation of the federal programs at the district and school level.

At the conclusion of the site monitoring the OSDE staff reviews preliminary results. After the on-site visit, the program specialists offer technical assistance via fax, e-mail, and phone conversations to assist the district in achieving compliance status. Program specialists provide a formal monitoring report to the district in a timely manner and provide appropriate follow-up for all corrective action requirements.

District Response to Monitoring Recommendations:

Upon receipt of the monitoring report, the district should respond to any *findings* (items not meeting requirements) by the established timeline. Districts are held accountable for submitting all corrective action responses by the assigned due date. Corrective action responses are then carefully reviewed by OSDE staff to ensure that all compliance issues identified in the monitoring report have been thoroughly addressed.

OSDE's Response to Corrective Action Requirements:

When necessary, the team leader schedules a follow-up visit or communicates with the district for the purpose of discussing the corrective action requirement for the purpose of verifying the implementation of required corrective actions and to provide technical assistance as necessary.

OSDE has consistently developed and performed subrecipient monitoring requirements as set forth by the USDE. OSDE administers the monitoring process on an annual basis according to a specific 5-year monitoring schedule. OSDE has worked hard in its efforts to provide effective and efficient monitoring processes that demonstrate accountability and transparency for the purpose of maintaining integrity for all federally funded programs.

Title I, Part A, ARRA, Neglected ARRA, Delinquent ARRA, Homeless ARRA

This office will provide technical assistance and support necessary to assist districts/charters in effectively submitting federal programs expenditure reports through the ARRA online expenditure reporting system. Districts and charter schools were asked to attend the training when the new online system was implemented. Multiple training opportunities through videoconferences, conferences, and Webinars were designed to assist those districts and charters in submitting expenditure reports on the ARRA online expenditure system. A Webinar and instructions were available on the OSDE Website for those not able to attend the training or videoconferences. Charter Schools may contact the following OSDE staff members when making federal programs inquiries:

Mary Colvin, Executive Director, Title I, School Support/ARRA
Mary_Colvin@sde.state.ok.us
(405) 522-3253

Amanda Drew, Grants Consultant, School Improvement
Amanda_Drew@sde.state.ok.us
(405) 522-3713

Uploading a Summary Expenditure Report for FY12

Step 1: The ARRA Expenditure Reporting system is accessed through the School District Reporting Site (SDRS). Please logon as usual.

Step 2: After the logon is completed, click the link titled “ARRA Expenditure Reporting.”

Step 3: After the page refreshes, click the link of the appropriate program (example ARRA - NCLB Title I-A).

Step 4: After the program link has been clicked, the user will be directed to the Application Select screen. The user will see the 2011 application, 2010 application, and the 2009 application. The Application Select page determines which fiscal year the user would like to operate in. The system is configured to only accept new Summary Expenditure Reports for FY12 (2011-2012). Please do not attempt to enter any new Summary Expenditure Reports for FY2011 (2010-2011) or for FY10 (2009-2010) or FY09 (2008-2009).

To enter new requests, select the 2011-2012 year. Once selected, the Payments button will “enable”. You should then click the Payments button. You will not be able to click the Payments button prior to selecting an application.

Step 5: Now the user is observing the Payment Summary Screen. The section titled FY11 unexpended balance shows the Current Year Allocation. This balance makes up the “Total Funds to be Budgeted at Beginning of FY2012.” The numbers in this section do not change. When a budget has been entered or has been rolled over from FY11, the budgeted amount appears in the “Approved Budget” section.

The “**Pending Expenditure Reports**” include the following:

1. Any summary expenditure reports that have been approved but not sent to Treasury for payment.
2. Only expenditure reports that will generate a reimbursement payment go into this category.

The “**Completed Expenditure Reports**” section shows all FY12 expenditure reports that have been approved and paid. Once a report in “Pending” has been paid from the Treasury Department, then it will be moved to “Completed.”

The “**Remaining Balance of Expenditure Reports or Claims**” section shows how much of the “Approved Budget” amount is still available to be spent. This amount is reached by taking the total funds that were budgeted for FY12 and subtracting the total of “Pending Expenditure Reports” as well as subtracting the total of “Completed Expenditure Reports.”

To view a list of the summary expenditure reports that have been submitted to the Oklahoma State Department of Education (including their status) and to create a new summary expenditure report, click on the “View Summary Expenditure Reports” button.

Step 6: This screen is the Program Selection screen. Open the Drop Down List. For Title I-A, only Title I-A will appear. For IDEA, there will be 3 options: Flow-through, Pre-school, and Early Intervening.

Step 7: This screen shows the Summary Expenditure Report Menu. This screen is where the user can see all previously submitted expenditure reports. To open an existing request, click the Open Request button after selecting the appropriate radio button.

Please refer to the Review Summary button. If the status of a Summary Expenditure Report is “Returned for Changes”, click the Review Summary button. This will load the Review Checklist completed by the Oklahoma State Department of Education, and

should contain comments regarding the items that must be changed or corrected before the Summary Expenditure Report can be resubmitted.

Step 8: Click the Create New Request button to begin a New Summary Expenditure Report. This screen is where you will enter data from your “hardcopy” Summary Expenditure Report. The top part of the screen shows the existing budget that was entered by the OSDE. This is a reminder that you can only submit the Expenditure Reports for the function and object codes that have been budgeted. Here are the steps for completing your online expenditure report.

- Have the hard copy Summary Expenditure Report, printed from the district’s software, available. The online expenditure report will be a duplicate of the Summary Expenditure Report.
- Begin by selecting the function and object code in the drop box. (Select the Function Code, then Object Code, enter a description, and an amount. Perform this for as many rows as are needed. All expenditures require a description, such as tutoring, Reading Teacher, or Interactive Whiteboards.
- Look at the Indirect Cost section. The Indirect Cost will be entered here. The system is programmed to calculate the maximum IDC your district can receive as long as the district has budgeted for this.
- If a mistake has been made, you may delete a row by checking the corresponding delete row box. If you require additional lines, click “create additional entries.”
- Your next step is to click “calculate totals.” Please verify that the total matches your hard copy expenditure report.
- The next step is to enter the dates. The dates should range from the first day of each month to the last day of each month, such as October 1 through October 31. This date should correspond to the dates on the hard copy expenditure report.
- Then, upload the supporting documentation to the ARRA Expenditure Reporting site. Supporting documentation will include Summary Expenditure Reports (including the detailed expenditure pages), invoices, agendas, POs, travel claims, and receipts. Uploaded documents must be in a PDF format. Please ensure that all expenditure reports are signed.
All supporting documentation may be uploaded into the system, which will allow for quicker processing. Documentation may also continue to be faxed or mailed as usual.
- The next step is to save the page. Errors that show at the top of the screen after saving must be corrected prior to certifying and/or submitting the report.
- Once all errors are corrected and page has been saved, the superintendent must click the certified/submitted button. This step will automatically send the Expenditure Reports to the OSDE for processing.

Child Nutrition Services

Child Nutrition:

This office will provide technical assistance information necessary to effectively submit Child Nutrition applications/reports. Child Nutrition has been involved in several Charter School training sessions. Topics included the following:

- Application/Agreement
- Free/Reduced Price Application Approval/Benefit Issuance
- Self operating versus Contract Meals
- Meal Counting and Claiming (Edit Checks)
- Claim for Reimbursement
- Food Safety Inspection Report
- Low Income Report

- Verification Report
- Year-End Expenditure Report
- Wellness Policy
- Minimum Meal Pattern Requirements
- Hazard Analysis Critical Control Point (HACCP) Plan
- Procurement Plan
- Civil Rights Compliance Checklist
- Direct Certification

Charter Schools may contact the following OSDE staff Members when making Child Nutrition Programs inquiries:

Joanie Hildenbrand, Executive Director at (405) 521-3327
 Donna Mattox, Coordinator at (405) 521-3327

Special Education Services

IDEA, Part B

On December 3, 2004, the IDEA Amendments of 2004 were enacted into law as P.L. 108-446. Funds are awarded to the OSDE by the United States Department of Education (USDE), Office of Special Education Programs (OSEP), to "flow-through" to the LEA contingent upon an LEA's application for Part B funds. Flow-through funds will be awarded on a formula based on the number of children with disabilities aged three through 21 served on December 1, 1999, as well as the total enrollment in the LEA (in both public and private schools located in the LEA) and the poverty level of the LEA (defined as the free and reduced lunch count within the LEA). Section 619, or Preschool, (P.L. 94-112 as amended by P.L. 99-457, 102-119, 105-17, and 108-446) funds are earmarked for children with disabilities aged three through five, and are awarded on a formula based on the number of children with disabilities aged three, four, and five served on December 1, 1999, as well as the total enrollment in the LEA (in both public and private schools located in the LEA) and the poverty level of the LEA (defined as the free and reduced lunch count within the LEA)."

Allocations to LEA's

In accordance with IDEA Part B (34 CFR § 300.705), LEAs must first be provided a base amount equal to the amount the LEAs would have received in school year 1999-2000 had the OSDE-SES flowed 75 percent of the state grant award to LEAs. Effective July 1, 2009, each State must distribute funds to eligible LEAs, including public charter schools that operate as LEAs. However, because of the addition of a new LEA in 2009, each LEA's base allocation is based on its October 1, 2008, child count. Of any additional funds distributed to LEAs, 85 percent is distributed on a pro rata basis according to public and private elementary and secondary school enrollment, and 15 percent on a pro rata basis according to the number of children living in poverty (defined as the free and reduced lunch count within the LEA).

Timelines for Submission of Applications

Assurances must be submitted online no later than Friday, July 1, 2011 (34 CFR § 300.200). The LEA's application for funds must be submitted by Friday, September 23, 2011. Funds must be obligated during the period of the project, which is Friday, July 1, 2011, through Saturday, June 30, 2012. Final letters of entitlement based on current-year funds will be mailed upon application review and approval by the OSDE, Special Education Services (SES). A revised letter of entitlement will be mailed to LEAs eligible to receive carryover from prior-year

allocations upon closure of FY2011 funds. Note: expenditure reports (i.e., claims) will not be reimbursed prior to the approval of the LEA's Application for Federal Special Education Funds.

Expenditure Reports

- A. Computer program-generated expenditure reports will be required for reimbursement of expended funds. Specific instructions and forms for expenditure reports for each funding source may be found on pages 32-37 of the Oklahoma Cost Accounting System (OCAS) Manual under the Policies and Procedures section.
- B. ARRA expenditure reports are due as follows: Tuesday, August 23, 2011; Tuesday, September 20, 2011; final claim due Friday, October 28, 2011. It is critical that districts submit these reports for the purpose of demonstrating accountability and transparency required by ARRA and Cash Management Act.
- C. P.L. 101-453, the Cash Management Improvement Act, requires the State Treasurer to utilize automated clearinghouse procedures. In addition, it requires agencies such as the OSDE to present these transactions to the Office of State Finance in a summary format.
- D. Payment of all funds from the OSDE-SES will be processed upon receipt of a computer program-generated expenditure report. This report must be for reimbursement of expended funds, preferably at the end of each quarter. Payment will be made electronically utilizing the Catalog of Federal Domestic Assistance (CFDA) numbers of a federal program.
- E. CFDA numbers are:
 - Project Code 621 – Flow-Through - CFDA #84.027 (Source Code 4310)
 - Project Code 622 – ARRA, IDEA B, Flow-Through – CFDA #84.931 (Source Code 4320)
 - Project Code 623 – Early Intervening Services - CFDA #84.027 (Source Code 4310)
 - Project Code 624 – ARRA, Early Intervening Services – CFDA #84.931 (Source Code 4320)
 - Project Code 641 – Preschool (3-5) - CFDA #84.173 (Source Code 4340)
 - Project Code 643 – ARRA, Preschool, Part B – CFDA #84.392 (Source Code 4330)
- F. All claims for reimbursement must be postmarked on or before Wednesday, August 1, 2012. Unclaimed funds will become carryover funds into the new fiscal year (OAC Chapter 25, Section 210, Finance).

1512 Quarterly Reporting

The *American Recovery and Reinvestment Act of 2009 (ARRA)* provides approximately \$100 billion for education, creating a historic opportunity to save hundreds of thousands of jobs, support states and school districts, and advance reforms and improvements that will create long-lasting results for our students and our nation including early learning, K-12, and postsecondary education.

To meet the quarterly reporting requirements of ARRA, sub-recipient districts must supplement the data that the Oklahoma State Department of Education (OSDE) is providing. Information that resides on its data systems has enabled the OSDE to report most of the required ARRA data for sub-recipients.

The OSDE will be calculating the additional ARRA Jobs FTE from the ARRA-funded extra-duty, stipend and temporary duties reported on the OSDE's School Personnel Records System for certified and support personnel. **BE SURE THAT ALL ARRA-FUNDED ADDITIONAL DUTIES HAVE BEEN REPORTED ON THE SCHOOL PERSONNEL RECORDS SYSTEM BY THE END OF EACH QUARTER.**

ARRA Quarterly reporting (\$25K Vendor) can be accessed on the School District Reporting Site, using the **\$25K Vendors** tab, districts must provide specified information by each ARRA funding source, for every vendor that a school district has paid single payment(s) of \$25,000 or more in a designated quarter.

Annual Renewal of DUNS Registration in the CCR Database

It is required, per Section 1512 ARRA reporting that your DUNS number be registered with the Central Contractor Registration (CCR). Although sub-recipient CCR numbers are not currently part of the Federal Reporting.gov system, all Recovery Act recipients are required to register in CCR. This requirement is a condition attached to each Department of Education Recovery Act grant. CCR is required annually.

IDEA, Part B

Monitoring Procedures

Process Number One: The Desk Monitoring (ARRA)

As a recipient of IDEA, Part B ARRA State grant funds from the United States Department of Education (USDE), OSDE is required to conduct monitoring reviews during the award program to ensure that subgrants of IDEA, Part B ARRA funds to Charter schools are used in accordance with the purposes of the authorizing statute.

The LEA Self-Assessment Tool provides the opportunity to review the quality and effectiveness of efforts, performance, and programs under the IDEA. The process also allows the Charter school to evaluate key data to ensure compliance and transparency with requirements of the ARRA and develop a plan for improvement to ensure compliance and results for children and young adults with disabilities.

Objective

To assess the degree to which accounting systems and internal control requirements are being implemented and make recommendations when appropriate.

Instructions

1. The LEA IDEA, Part B program officer will participate in a monitoring conference call with the OSDE, SES.
2. A copy of the IDEA, Part B ARRA LEA Self-Assessment Tool will be sent to all districts including charters being monitored.
3. Areas reviewed for monitoring will include: (1) district financial management processes, (2) program funds, (3) records management, including time and effort and inventory processes and (4) ARRA reporting. Supportive documentation may be requested.
4. LEAs undergoing monitoring review may expend funds during the review process.
5. To minimize paperwork and travel time, resolution of monitoring issues will be accomplished in a variety of ways, including conference calls, electronic correspondence, and on-site visits when warranted. If the LEA is in noncompliance with ARRA requirements, a corrective action plan (CAP) must be completed and submitted to the OSDE.
6. LEAs will be notified if an on-site monitoring visit is warranted.

Process Number Two: On-Site Monitoring (Regular IDEA and ARRA)

Comprehensive compliance reviews consist of an on-site visit to the LEA which includes a review of all special education and related services provided by the local educational agency (LEA). This review may include, but is not limited to: a review of student records, a review of administrative records, staff interviews, parent interviews, and tracking of students. This type of monitoring also consists of a financial component which includes a review of the Charter school's Part II Finance Application and any expenditure reports (claims) submitted by the Charter school for appropriateness under Part B of Individuals with Disabilities Education Act (IDEA).

Corrective Action Plan

A few days after the monitoring report has been mailed, the lead coordinator will call the LEA to schedule the thirty/sixty day due dates. Use the Follow-Up Report form to document anytime you make contact with the LEA. E-mail these dates to Ms. Janet Felton. Mark these dates, along with the one week prior date, on your calendars.

The lead coordinator will call the LEA one week prior to the thirty day due date and ask if any assistance is needed. When the thirty day documentation has been received by the OSDE-SES, the lead coordinator will meet with a team and approve/disapprove the documentation within two weeks. Document this on the Corrective Action (CAP) Summary form. If the documentation is not approved, the lead coordinator will contact the LEA and request the needed information.

The lead coordinator will call the LEA one week prior to the sixty day due date and ask if any assistance is needed. When the sixty day documentation has been received by the OSDE-SES, the lead coordinator will meet with a team and approve/disapprove the documentation within two weeks. Document this on the Corrective Action (CAP) Summary form. When the CAP has been approved, Ms. Janet Felton will mail a letter to the LEA letting them know that the CAP has been closed.

Any extension approval needs to be pre-approved by the Monitoring Project Coordinator and documented on the follow-up report with a clear extension due date. E-mail the extension due date to Ms. Janet Felton.

CAPs that are over their sixty day due date, with no extension approved, should be brought to the Monitoring Project Coordinator's attention so that a letter can be sent to the Superintendent.

Procedures for Requesting a Hearing

The LEA is entitled to an opportunity for a hearing with respect to the identified areas of noncompliance. The OSDE shall provide an opportunity for a hearing before sanctions are imposed. The LEA may request a hearing if the LEA alleges that the OSDE has violated State or federal statute or regulation. Hearing procedures shall be in accordance with federal regulations for State Administered Programs (34 CFR §§ 76.401 and 34 CFR 76.783) and the General Education Provisions Act (34 CFR §§ 81.30-81.45).

Charter schools may contact the following OSDE-SES staff members when making federal special education program inquiries for applications, budget approval, and claim reimbursement.

Anita Eccard, Associate State Director, Special Education Services (405) 521-4865
Pam Kimery, Project Coordinator, Special Education Services (405) 522-3246
Karen Howard, Finance Coordinator, Special Education Services (405) 521-3587
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As Charter Schools ‘take-on’ the new responsibilities of performing as local educational agencies where federal funds are concerned, the OSDE, as the grantee and fiscal agent of those funds, will ensure that all Charter Schools involved, follow all fiscal and programmatic requirements. The same ‘general’ grants management principles and sound business practices will now be applied to all participating Charter Schools as they are for any local educational agency.

The OSDE is now considered as the entity responsible for ensuring compliance with the requirements of *No Child Left Behind (NCLB) Act*, and in the event that the Charter School does not, or cannot properly reach or maintain compliance, the ultimate oversight authority for Charter School compliance rests with OSDE.