



NATIONAL
CHARTER SCHOOL
RESOURCE CENTER

Checklist for Subgrantee Monitoring

*A Resource for CSP State Entity
Grantees*

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The National Charter School Resource Center (NCSRC) provides technical assistance to federal grantees and resources supporting charter sector stakeholders working across the charter school life cycle. NCSRC is funded by the U.S. Department of Education and managed by Manhattan Strategy Group in partnership with WestEd.

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About This Resource

As part of the Charter School Programs (CSP) grant requirements for state entities (SEs), grantees must allocate at least 90% of their funds to subgrantees. SE grantees are expected to regularly perform subgrantee monitoring to ensure proper implementation of subgrant projects and subgrantee use of funds. This checklist is intended as a guide to help SE grantees facilitate the subgrantee monitoring process. This checklist is not intended to replace SE-generated subgrantee monitoring tools and procedures, but rather is a tool for SEs to use to ensure their monitoring process covers the necessary areas. This is not a comprehensive list and SEs may monitor and review subgrantees on additional factors beyond this checklist.

Subgrantee Monitoring Checklist

Verifications Needed During the Application Process

	The applicant applied to an authorized public chartering authority to operate a charter school.
	The applicant provided adequate and timely notice to that authority regarding the CSP application.
	The applicant has nonprofit status.
	The applicant is an organization with articles of incorporation.
	The applicant has not received a previous award under the grant, directly from ED or an SE, for the same purpose.
	For Replication or Expansion applicants: that the charter school is high quality, and <ol style="list-style-type: none">shows evidence of strong academic results, which may include strong student academic growth, as determined by a Statehas no significant issues in the areas of student safety, financial and operational management, or statutory or regulatory compliancehas demonstrated success in significantly increasing student academic achievement, including graduation rates where applicable, for all students served by the charter school (except when a student group is too small to yield statistically reliable information or would reveal personally identifiable information about an individual student)
	The proposed school is exempt from significant State or local rules that inhibit the flexible operation and management of public schools.

	The proposed school is created by a developer as a public school, or adapted from an existing public school, and is operated under public supervision and direction.
	The proposed school operates in pursuit of a specific set of educational objectives determined by the developer and agreed to by the authorized public chartering agency.
	The proposed school provides a program of elementary and/or secondary education.
	The proposed school is nonsectarian in its programs, admissions policies, employment practices, and all other operations, and is not affiliated with a sectarian school or religious institution.
	The proposed school will not charge tuition.
	The applicant complies with the Age Discrimination Act of 1975, Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), Section 444 of the General Education Provisions Act (20 U.S.C. 1232g) (commonly referred to as the “Family Educational Rights and Privacy Act of 1974”), and Part B of the Individuals with Disabilities Education Act.
	The applicant has a written performance contract with the authorized public chartering agency that includes a description of how student performance will be measured pursuant to required State assessments and other mutually agreed to assessments.
	The proposed school has a high degree of autonomy over budget and operations, including autonomy over personnel decisions.

School Operations Compliance Monitoring (should be ongoing)

	Before opening, the school has a facility occupancy permit/certification.
	Parents choose to send their children to the school.
	The school admits students based on a lottery if more students apply than can be accommodated.
	The school operates in accordance with State law.
	The school is nonsectarian in its programs, admissions policies, employment practices, and operations, and is not affiliated with a sectarian school or religious institution.
	The school does not charge tuition.

	The school complies with the Age Discrimination Act of 1975, Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), Section 444 of the General Education Provisions Act (20 U.S.C. 1232g) (commonly referred to as the “Family Educational Rights and Privacy Act of 1974”), and Part B of the Individuals with Disabilities Education Act.
	The school meets all applicable Federal, State, and local health and safety requirements.
	The school conducts an annual, timely, and independent audit of financial statements that are publicly reported.
	Recruitment and retention policies are in place that promote inclusion of all students, including eliminating barriers to enrollment for educationally disadvantaged students and retention of all students.
	The educational program/grant activities observed matches the grant application description.
	The charter school has made publicly available, including on the school’s website, the following information: <ul style="list-style-type: none"> • The educational program • Student support services • Parent contract requirements (as applicable) including any financial obligations or fees, • Enrollment criteria • Annual performance and enrollment data for each subgroup of students (except in cases where disaggregation would reveal personally identifiable information about an individual student or the number of students within a subgroup is too small to yield statistically reliable information)
	The school has policies regarding depreciation aligned with 2 CFR 200.436.
	The school has procurement policies aligned with 2 CFR 200.317.
	The school has conflict of interest policies aligned with 34 CFR 75.525.
	The school has policies regarding disposition of assets aligned with 2 CFR 200.313.
	The school has policies in place in the event of a closure that include the transfer of school records.
	School board meetings and meeting notes are open to the public.
	The school has record retention policies.
	The school has internal controls that ensure Federal funds are used for reasonable, allocable, and allowable expenses.

	The school has considered and planned for student transportation needs.
	The school met all grant special/specific conditions and assurances.

Risk Mitigation for Subgrants that Contract with or are Operated by a Management Organization

	The management contract ensures the governing board retains control over funds and operations.
	The governing board has operational authority over the school.
	The governing board has fiscal authority over school operations.
	There are signed conflict of interest forms on file for the governing board members.
	There is a segregation of duties to mitigate the risk of waste, fraud, and abuse.
	There are related-party policies to mitigate the risk of waste, fraud, and abuse.

Project Status Monitoring (should be monitored annually)

	Grades served versus those proposed
	Number of available seats versus those proposed
	Number of students enrolled versus those proposed
	Number of faculty/staff versus those proposed
	Student demographics versus those proposed
	Student academic results
	Percent of special education students compared to local schools
	Percent of EL students compared to local schools
	The school is meeting the education needs of all students including students with disabilities and ELs.

	Components within subgrant application are being followed/adhered
	Milestones/benchmarks are being met

Fiscal Controls and Use of Funds Monitoring (should be monitored annually or more often)

	Review subgrantee approved budget (and any modifications or amendments)
	Review subgrantee expenditures
	Ensure all expenditures meet the definition of allowable, allocable, and reasonable
	Review invoices/accounting documentation
	Review inventory list of items purchased with grant funds
	Ensure inventory items are appropriately tagged
	Review any subcontractor/consultant invoices and role
	Review how the school follows internal control policies
	Review how the school manages and oversees the subgrant budget
	Review financial statements (e.g., profit/loss, budget vs. actual)

Other Things to Consider (should be monitored annually)

	Relationship with the authorizer (e.g., regular communications, compliance, reporting)
	How the school engages/gathers input from families/community
	The school has no significant issues in the areas of student safety, financial and operational management, or statutory or regulatory compliance.

Other Documents to Review (should be monitored annually)

	Charter or performance contract
	Communications with authorizer
	Authorizer reports or corrective action notes
	Most recent audit
	Recent board meeting agendas and minutes
	Evidence of student academic achievement results
	School calendar/schedule
	CMO/Operator contract
	Evaluation plan/report
	Multiyear sustainability plan
	Project/program logic model
	School website

Protocols and Processes

All SE grantees are responsible for monitoring subgrantee project implementation and compliance, although when and how this is accomplished is at the discretion of the SE. In thinking through your subgrantee monitoring policies and procedures, consider the following.

Subgrantee Monitoring Protocol

	The onsite monitoring is based on risk assessment or all subgrants are visited.
	The monitoring protocol is documented.
	There is documented monitoring training on the use of the protocol.
	The monitoring policy includes standards for selection and qualifications of monitors.
	The monitoring policy includes a process for corrective actions post-monitoring.
	Corrective actions are documented.

People You May Wish to Interview as Part of the Monitoring Process

	Governance board members
	Authorizer representative
	School administrator
	Teachers
	Administration staff
	Community focus group
	Financial manager
	Parents of students