

21ST CCLC MONITORING REVIEW: DISTRICT OF COLUMBIA



21st Century Community Learning Centers Monitoring Report

State: **District of Columbia**

Date of Monitoring Review: **May 14-15, 2018**

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21ST CCLC MONITORING REVIEW: DISTRICT OF COLUMBIA**Monitoring Review Participants****U.S. Department of Education**

- Keely Weber, Program Officer

U.S. Department of Education Contractor Staff

- Elizabeth Starr, Monitoring Assistance Team
- Paul Coleman, Monitoring Assistance Team

Key State Personnel Interviewed

- Sheryl Hamilton, Director of Community Learning and School Support (CLASS), OSSE Division of K-12 Systems and Supports (K12SS)
- Dr. Valrie Brown, Program Analyst, CLASS
- Myles Cliff, Program Analyst, CLASS
- Matt Epstein, Financial Program Analyst, K12SS
- Jonathan Elkin, Special Assistant, K12SS
- Kieran Bowen, Administrative Management Officer, K12SS
- Paris Saunders, Agency Fiscal Officer, Office of the Chief Financial Officer (OCFO)
- Stephen Regis, Senior Budget Analyst, OCFO
- David Mobley, Accountant, OCFO

Subgrantees Interviewed

- Margot Berkey, Coordinator, Out of School Time Programs, District of Columbia Public Schools
- Cora Masters Barry, CEO and Founder, Recreation Wish List Committee, 21st CCLC Project Manager
- Dr. Nakita McNeil-West, Site/Program Coordinator
- Constance Berry Newman, Advisor
- Pilla Parker, Consultant

21ST CCLC MONITORING REVIEW: DISTRICT OF COLUMBIA**Site Demographics**

	Total Allocation	Remaining Balance
FY15	\$5,643,198.00	0
FY16	\$5,716,698.00	\$213,998.81
FY17	\$5,839,198.00	\$5,717,676.65

(Source: G5, completed by PO)

Number of Currently Active Subgrantees: 28**Number of Currently Active Centers: 112****Office of the State Superintendent of Education 21st CCLC Webpage:**<https://osse.dc.gov/service/title-iv-part-b-21st-century-community-learning-centers-cclc>

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Overview

The purpose of the review with the Office of the State Superintendent of Education (OSSE) was to conduct a targeted monitoring review to ensure that the OSSE's 21st Century Community Learning Centers (CCLC) program office is allocating and using funds for allowable activities, implementing the program according to the approved plan, conducting a statewide evaluation, and using evaluation results to appropriately improve programs [ESEA Title IV, Part B, Sections 4202, 4203, 4204]. In addition, the U.S. Department of Education's (ED) goal in conducting these reviews is to gather information about State and local needs and use that information to design technical assistance (TA) initiatives and national leadership activities.

During the one-and-a-half-day, virtual review, the ED program officer, Keely Weber, and contractor staff conducted interviews with OSSE officials, including 21st CCLC program staff and federal grants personnel. The focus of the interviews was on how OSSE conducts award competitions, monitors subgrantees, uses evaluation results for program improvements, and accounts for state activity funds under the 21st CCLC program. Specifically, the monitoring team focused on Critical Element I (Elements 2, 3, 6, 10, 12, and 22), Critical Element II (Elements 2, 7, 11-14, and 18-21), and Critical Element III (Elements 1-3). To further examine how OSSE communicates with subgrantees, the contractor's staff and ED program officer interviewed administrative staff and site directors from two SEA-selected 21st CCLC subgrantees.

ED's monitoring team extends its sincere appreciation to the staff of OSSE's 21st CCLC program for their prompt response to the monitoring team's request for materials throughout the review process. The OSSE 21st CCLC program staff prepared and provided documentation ahead of the review to support the Critical Elements targeted during this review. ED would also like to thank OSSE staff for meeting with the ED monitoring team and coordinating interviews with subgrantees.

This report serves as the official notification to OSSE of ED's findings relative to the topics addressed during the monitoring review. OSSE shall respond to any findings within the stated timeframes. Recommendations do not require OSSE to take any corrective action, but are provided to give feedback on best practices and areas for program improvement. OSSE may make technical revisions to this report (e.g., correcting titles and misspelled names) within 10 business days of receipt; revisions can be provided to Keely Weber, ED program officer at keely.weber@ed.gov or (202-401-1498).

21ST CCLC MONITORING REVIEW: DISTRICT OF COLUMBIA**Summary of Monitoring Indicators****State:** District of Columbia**Date of Monitoring Review:** May 14-15, 2018**Monitoring Team:** Program Officer: Keely Weber; Monitoring Assistance Team: Elizabeth Starr and Paul Coleman**Post-Review Compliance Designations:**

- Met Requirement
- Sufficient Progress with Recommendation
- Noncompliance with Finding

Critical Element I: SEA Complies with the Legislative Requirements to Award Subgrants to Eligible Entities on a Competitive Basis
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Requirement	Citation	FY 2018 Status
I.1 Has the state reserved not less than 93% of the state's allotment for each fiscal year for awards to eligible subgrantees?	§4202(c)(1)	Not monitored during this targeted review
I.2 Does the SEA develop its RFP/award application in consultation with the governor and other state agencies responsible for administering youth development programs and adult learning activities?	§4202(c)(2)(B)	Met Requirement
I.3 Does the SEA clearly identify all of the required information to the subrecipient on the subaward notice?	UGG §200.331(a)	Met Requirement
I.4 Are the subgrants of sufficient size and scope to support high-quality, effective programs that are consistent with legislative purpose and made in amounts of at least \$50,000 per year?	§4203(a)(5)(A)-(B) §4204(h)	Not monitored during this targeted review

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I.5 What is the SEA's annual continuation award process and how does it verify that subgrantees are implementing the program as planned?	NRG F-29	Not monitored during this targeted review
I.6 Does the SEA maintain a policy regarding subgrant renewability and ensure that subgrant renewals are based on the eligible entity's performance during the preceding subgrant period?	§4204(j)	Met Requirement
I.7 Does the SEA require that applicants show how they will provide a safe and easily accessible facility?	§4204(b)(2)(A)(i) §4204(c)	Not monitored during this targeted review
I.8 Does the SEA require that applicants show how they will properly address the transportation needs of students?	§4203(a)(10) §4204(b)(2)(A)(i)	Not monitored during this targeted review
I.9 Does the SEA require that applicants describe how they will disseminate information about the center to the community?	§4204(b)(2)(A)(iii)	Not monitored during this targeted review
I.10 Does the SEA require that funds will supplement and not supplant other federal, state, and local public funds to provide allowable programs and activities?	§4203(a)(9) §4204(b)(2)(G)	Not monitored during this targeted review
I.11 Does the SEA make awards for not less than three-years and not more than five years?	§4203(a)(8)(A)	Not monitored during this targeted review
I.12 Does the SEA require applicants to describe how the community-learning center will continue after 21st CCLC funding ends?	§4203(a)(8)(B) §4204(b)(2)(K)	Sufficient Progress with Recommendation
I.13 Does the SEA require applicants to describe their partnerships between local educational agencies, community-based organizations, and other public or private entities, if appropriate?	§4204(b)(2)(H) §4204(i)(1)(B)-(2)	Not monitored during this targeted review
I.14 Does the SEA require applicants to evaluate the community needs and available resources for the community learning center and describe how the program will address those needs (including the needs of working families)?	§4204(b)(2)(I) §4205(b)(1)(A)	Not monitored during this targeted review
I.15 Does the SEA require applicants to demonstrate their experience or promise of success in providing educational and related activities that will complement and enhance the academic performance, achievement, and positive youth development of the students?	§4204(b)(2)(J)	Not monitored during this targeted review
I.16 Does the SEA require applicants to provide assurance that the community has been notified of its intent to apply and that the application and any waiver request is available for public review after submission of the application?	§4204(b)(2)(L)	Not monitored during this targeted review
I.17 Does the SEA require applicants to describe how they plan to address the needs of participants' families?	§4201(a)(3) §4204(b)(2)(F)	Not monitored during this targeted review

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I.18 Does the SEA conduct outreach efforts to inform eligible entities about the award competition, including local educational agencies, community-based organizations, faith-based organizations, nonprofit agencies, city or county government agencies, institutions of higher education, and for-profit corporations about the grant competition?	§4201(b)(3) §9501(c) NRG F-1	Not monitored during this targeted review
I.19 Does the SEA provide training or technical assistance for potential applicants, such as a bidders' conference?	§4202(c)(3)(D)	Not monitored during this targeted review
I.20 Does the SEA require that applicants consult with private schools about grant opportunities and availability of services for private school students?	§9501(c) NRG F-16 NRG F-20	Not monitored during this targeted review
I.21 To the extent practical, does the SEA distribute funds equitably among geographic areas within the state, including urban and rural communities?	§4204(f)	Not monitored during this targeted review
I.22 Are the criteria and procedures for reviewing applications and awarding funds on a competitive basis to eligible entities clearly described, including procedures and criteria that take into consideration the likelihood that a proposed community learning center will help participating students meet local content and student academic achievement standards?	§4203(a)(4) §4204(b)(1) §4204(b)(2)(N) §4201(b)(3) §9501	Met Requirement
I.23a Does the SEA establish criteria through the award competition process for targeting funds to serve students who primarily attend schools eligible for Title I school-wide programs or from low-performing schools or schools that serve a high percentage of students from low-income families and the families of the students described as being served? I.23b Did the SEA establish State priorities or special criteria for the competition? If so, what were they?	§4201(a)(1) §4203(a)(3)(A) (i)-(ii) §4203(a)(3)(B) §4203(a)(3)(F) §4204(b)(2)(F) §4204(i)(1)(A)	Not monitored during this targeted review
I.24 Has the SEA established and implemented a peer review process for awarding grants on a competitive basis?	§4202(c)(2)(B) §4204(b) §4204(e)	Not monitored during this targeted review

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**Critical Element II: SEA uses Standards, Assessments, Monitoring
and Evaluation to Hold Subgrantees Accountable**

Requirement	Citation	FY 2018 Status
II.1 Does the SEA conduct a subgrantee risk review to inform monitoring strategies?	4202(C)(3)(A) UGG §200.328(a) UGG §200.331(b)(d)	Not monitored during this targeted review
II.2 Does the SEA conduct regular, systematic reviews of subgrantees to monitor for compliance with federal statutes and regulations, applicable state rules and policies?	4202(C)(3)(A) EDGAR §76.770 UGG §200.328(a) UGG §200.331(b)(d)	Met Requirement
II.3 Does the SEA monitor that the subgrantees provide a broad array of activities that improve student academic achievement?	§4204(b)(2)(B) §4205(a) §4205(b)(1)(C)	Not monitored during this targeted review
II.4 Does the SEA monitor that the subgrantees' students travel safely to and from centers?	§4204(b)(2)(A)(ii)	Not monitored during this targeted review
II.5 Does the SEA monitor that the subgrantees house activities in a safe and accessible facility?	§4204(b)(2)(A)(i)	Not monitored during this targeted review
II.6 Does the SEA monitor that the subgrantees disseminate information about the center's operations to community members?	§4204(b)(2)(A)(iii)	Not monitored during this targeted review
II.7 Does the SEA monitor that the subgrantees plan for sustainability?	§4204(b)(2)(K)	Met Requirement
II.8 Does the SEA monitor that the subgrantees follow Principles of Effectiveness:	§4204(B)(2)(C) §4205(b)(1)(A)-(C)	Not monitored during this targeted review
II.9 Does the SEA monitor that subgrantees are in active collaboration with the schools the students attend?	§4204(b)(2)(D)	Not monitored during this targeted review
II.10 Does the SEA notify subgrantees of recommendations and findings. Does the SEA follow-through with the implementation of corrective actions?	Uniform Guidance §200.331(d)(2)	Not monitored during this targeted review
II.11 Does the state conduct a comprehensive evaluation (directly, or through a grant or contract) to monitor the effectiveness of 21 st CCLC programs, and progress towards the performance indicators and performance measures used to evaluate subgrantees?	§4202(C) (3)(A) §4203(a)(6) §4203(a)(13) §4205(b)(2)(A) NRG H-5	Noncompliance with Finding

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II.12 Does the state have clearly defined and appropriate performance indicators and performance measures used to evaluate programs? If so, what are they? Does the state measure GPRA indicators?	§4203(a)(13)(A) §4205(b)(1)(B) NRG H-5	Met Requirement
II.13 Does the SEA notify and make program evaluations available to the public upon request?	§4203(a)(13)(B) §4205(b)(2)(B)(ii)	Noncompliance with Finding
II.14 Does the SEA use the results of its statewide evaluations to refine, improve, and strengthen the program and to refine state performance measures?	§4203(a)(6) §4205(b)(2)(B)(i)	Noncompliance with Finding
II.15 Does the state require that subgrantees undergo a periodic evaluation to assess progress toward achieving the goal of providing high quality opportunities for academic enrichment based on Principles of Effectiveness?	§4202© (3)(A) §4203(a)(6) §4203(a)(13) §4205(b)(2)(A) NRG H-5, H-6	Not monitored during this targeted review
II.16 Does the SEA monitor that subgrantees use the results of evaluations to refine, improve, and strengthen the program and to refine subgrantees performance measures?	§4203(a)(6) §4205(b)(2)(B)(i)	Not monitored during this targeted review
II.17 Does the SEA monitor subgrantees to ensure that APR data are submitted accurately and on time?	EDGAR §76.770 UGG §200.331(d)(1) UGG §200.328(a) UGG §200.328(b)	Not monitored during this targeted review
II.18 Does the SEA provide subgrantees with trainings that support the professional development of program administrators and staff?	§4202(c)(3)(B) §4202(c)(3)(D) §4203(a)(6) UGG §200.331(e)	Met Requirement
II.19 Does the SEA provide subgrantees with technical assistance that increases programs' organizational capacity?	§4202(c)(3)(B) §4202(c)(3)(D) §4203(a)(6) UGG §200.331(e)	Met Requirement
II.20 Does the SEA disseminate promising practices to promote continuous improvement among subgrantees?	§4202(c)(3)(B) §4202(c)(3)(D) §4203(a)(6) UGG §200.331(e)	Met Requirement
II.21 Does the SEA have processes for developing and disseminating a list of prescreened external organizations to provide assistance in carrying out program requirements to subgrantees?	§4203(a)(11)	Met Requirement

21ST CCLC MONITORING REVIEW: DISTRICT OF COLUMBIA**Critical Element III: SEA Complies with the Allocation Requirements for State Administration and Technical Assistance**

Requirement	Citation	FY 2018 Status
III.1 Does the SEA budget and track expenditures that qualify under the 93% minimum for awards to eligible subgrantees?	§4202(c)(1)	Met Requirement
III.2 State Activities: Does the SEA budget and track expenditures that qualify under the 5% maximum to cover the following allowable costs? a. Monitoring and evaluation of programs and activities part of the state's 21 st CCLC program b. Providing capacity building, training, and technical assistance c. Comprehensive evaluation (directly or through a grant or contract) of the effectiveness of programs and activities d. Providing training and technical assistance to eligible entities who are applicants for or recipients of awards	§4202(C) (3)(A)-(D) UGG §200.302 UGG §200.331(e)	Met Requirement
III.3 State Administration: Does the SEA budget and track expenditures that qualify under the 2% maximum to cover the following allowable costs? a. Administering state's 21 st CCLC program b. Establishing and maintaining a peer review process for grant applications c. Supervising the awarding of funds to eligible entities	§4202(C) (2)(A)-(B) UGG §200.302	Met Requirement
III.4 If the SEA consolidates its 21 st CCLC program with other federal programs, does it separately track 21 st CCLC funds?	NRG E-2	Not monitored during this targeted review
III.5 What procedures are in place for tracking the time and effort of all full-time and part-time SEA positions that are supported by 21 st CCLC funds?	§4202(c)(2)(A-B) §4202(c)(3)(A-D) UGG §200.430 UGG §200.431	Not monitored during this targeted review
III.6 Does the SEA have a procedure to determine the amount of funds each subgrantee expended during the period of availability, such as monitoring drawdowns?	UGG §200.302 UGG §200.303	Not monitored during this targeted review
III.7 Does the SEA audit the 21 st CCLC program at both the state and subgrantees levels?	UGG §200.501 UGG §200.331(f) UGG §200.331(d)(3)	Not monitored during this targeted review

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III.8 Does the SEA <i>monitor</i> to ensure that subgrantees coordinate federal funds with other programs as appropriate? (Title I, USDA, HHS, DOJ, SES).	§4203(a)(7)	Not monitored during this targeted review
III.9 Does the SEA maintain financial records for at least three-years from the end of the 21 st CCLC grant?	UGG §200.333	Not monitored during this targeted review
III.10 Does the SEA have a written policy on allowable carryover funds that is consistent with statute? <ul style="list-style-type: none"> a. Allows subgrantees to carry over unobligated 21st CCLC funds or b. Collects carryover funds at the end of the initial grant period and redistributes them to other participating subgrantees, provided that each sub-grantee receives at least \$50,000 annually for a minimum of three years if subgrantee is making substantial progress in implementing its 21st CCLC program; c. If subgrantee is not making substantial progress, SEA may choose not to award an additional year(s) of the grant continuation and may redistribute any unobligated funds, even if doing so would reduce the funds available to the subgrantee below \$50,000. 	UGG G-12	Not monitored during this targeted review
III.11 If the SEA requires a local match, does it administer this requirement in compliance with statute: <ul style="list-style-type: none"> a. match does not exceed amount of grant award; b. match is not derived from other federal or state funds; c. match established on sliding scale that takes into account relative poverty of the target population and ability of entity to obtain matching funds; d. state permits any or all of match in the form of in-kind contributions; e. state does not consider ability to match funds when selecting subgrantees; f. match is not the sole responsibility of any one collaborating partner. 	§4204(d) Nonregulatory Guidance F-8	Not monitored during this targeted review

21ST CCLC MONITORING REVIEW: DISTRICT OF COLUMBIA**Summary of Recommendations and Findings****Critical Element I: SEA Complies with the Legislative Requirements to Award Subgrants to Eligible Entities on a Competitive Basis**

Critical Element I.12: *Does the SEA require applicants to describe how the community-learning center will continue after 21st CCLC funding ends?*

Current Status: Sufficient Progress with Recommendation

Observation: During the 2018 monitoring review, the monitoring team noted that OSSE’s RFA requires applicants to submit a sustainability plan. Further, OSSE described how their team follows-up on the sustainability plans during monitoring to ensure subgrantees are making progress, offering technical assistance (suggestions, support, or training, e.g.) when warranted.

At least one subgrantee is interested in using program fees. The OSSE RFA clearly describes their policy on program fees, strongly discouraging subgrantees from using the option and reiterating the intention of the 21st CCLC program (“to establish programs that offer academic assistance and enrichment to low-income students and their families.”), but outlining the requirements if they do (“Programs proposing fees must offer a sliding scale of fees and scholarships for those who cannot afford to participate. All program fees must be approved by OSSE and determined reasonable and encouraging the spirit of the law. All program fees must be reported to OSSE and use of the funds are strictly for the 21st CCLC program. Use of fees will be reviewed during on-site monitoring visits.”)

Given the recent interest in exploring program fees both in OSSE’s 21st CCLC program and in other states, the monitoring assistance team discussed the requirements in more detail. The team advised that program fees are considered additional funds; therefore, the federal 21st CCLC grant would need to be reduced by that amount of income, unless there is prior approval to use those additional funds. The SEA would need to apply for approval. Note that ED is awaiting guidance on this issue.

Recommendation: The monitoring team recommends that OSSE expand the language in their RFA to require subgrantees to submit a Program Income Plan, describing the purpose of charging fees and how the income will be re-invested in the program. If a program does charge fees, the subgrantee could include this income in their quarterly report to OSSE with an explanation of how they are using the funds.

21ST CCLC MONITORING REVIEW: DISTRICT OF COLUMBIA**Critical Element II: SEA uses Standards, Assessments, Monitoring and Evaluation to Hold Subgrantees Accountable**

Critical Element II.11: *Does the state conduct a comprehensive evaluation (directly, or through a grant or contract) to monitor the effectiveness of 21st CCLC programs, and progress towards the performance indicators and performance measures used to evaluate subgrantees?*

Current Status: Noncompliance with Finding

Observation: During the 2012 monitoring review, the team observed OSSE had not conducted a comprehensive evaluation since 2006. OSSE had released a request for proposals (RFP) for an evaluator, but had not received any appropriate responses. They re-released the RFP in Fall 2012, and were successful in hiring an evaluator who completed a comprehensive evaluation in 2013.

At the time of the current monitoring, the team observed that OSSE's last comprehensive evaluation was conducted in 2013, analyzing data of subgrantees from 2007-2012 (the entire 5-year award period).

ED recognizes the work OSSE is currently doing to meet this requirement. Since last year, OSSE has been actively working to hire an external evaluator to conduct another comprehensive evaluation. In response to their first Scope of Work (SOW), they received proposals that were well above their internal procurement threshold. After conducting market research, OSSE went through procurement again. Currently, the SOW is in the procurement system, awaiting approval. Once approval is granted, it can go out for bid. OSSE expressed optimism that the SOW will be in place before the end of the fiscal year, so that an evaluator can be hired this summer and begin work at the start of the next school year. A report would be complete for fiscal year 2019.

In the meantime, OSSE prepared an internal interim report, analyzing progress on performance indicators for FY17 based on self-reported data to inform FY18 continuation grants.

Further Action Required: Within thirty calendar days from the date of this report, OSSE shall submit to ED their approved Scope of Work and a timeline for completing their comprehensive statewide evaluation.

Critical Element II.13: *Does the SEA notify and make program evaluations available to the public upon request?*

Current Status: Noncompliance with Finding

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Observation: The monitoring team observed that OSSE's 2013 comprehensive evaluation report is posted on their website. However, a report has not been conducted since that time. OSSE has not shared their internal interim report publicly (though they have discussed it with subgrantees) since the data is self-reported; they are committed to sharing objective data. OSSE does plan to post the evaluation report on their website when completed (anticipated FY19).

Further Action Required: Within 1 calendar year and upon completion of a comprehensive evaluation report, OSSE will post on their website or otherwise make the report available to the public.

Critical Element II.14: *Does the SEA use the results of the statewide evaluations to refine, improve, and strengthen the program and to refine state performance measures?*

Current Status: Noncompliance with Finding

Observation: OSSE had a finding in this critical element during the 2012 monitoring review. The current monitoring team observed that OSSE's 2013 comprehensive evaluation report and their internal interim report included recommendations for improvement. During the review, OSSE described how they have responded to the recommendations as well as to needs that surface in monitoring (for example, by focusing technical assistance on family and community engagement and increasing regular attendance).

OSSE is committed to continuous improvement. However, the lack of a recent comprehensive evaluation limits OSSE's ability to engage in a continuous improvement process that is based on current analysis of their performance measures.

Further Action Required: Within thirty day of completion of a comprehensive evaluation report, OSSE will submit to ED the recommendations outlined in the report, along with a plan to address any areas for growth.

Critical Element III: SEA Complies with the Allocation Requirements for State Administration and Technical Assistance

The Department of Education has no recommendations or findings related to Critical Element III.