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**New York: Race to the Top  
Subrecipient Monitoring Plan**

**AUGUST 2012**

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**THE UNIVERSITY OF THE STATE OF NEW YORK**  
**THE STATE EDUCATION DEPARTMENT**

**New York State Education Department**  
**Race to the Top | Subrecipient Monitoring Plan**

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## NYSED's Approach to Monitoring

The New York State Education Department (NYSED) is implementing a subrecipient monitoring plan for the Race to the Top (RTTT) Program as specified in Grant Condition O in the RTTT Grant Award Notification and the April 15, 2011 letter from the United States Department of Education (USDE). The State Education Department's oversight and monitoring activities address three priorities:

- Assess compliance with appropriate laws, regulations, and the provisions of contracts and grant agreements;
- Document the implementation of programs to advance the Regents Reform Agenda and meet program performance targets at both the State and Local Education Agency (LEA) levels; and
- Ensure that the recipients of RTTT funds have the internal controls necessary to prevent fraud, waste and abuse, identify potential or existing problem areas, and identify areas where additional technical assistance is warranted.

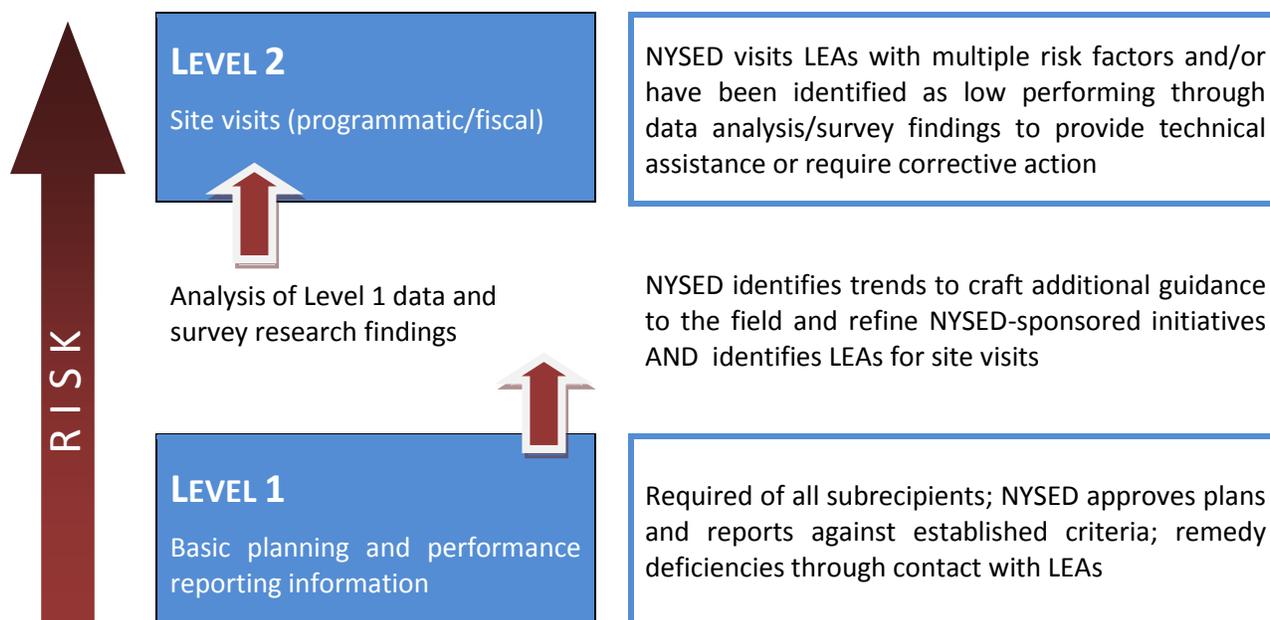
This Subrecipient Monitoring Plan describes NYSED's process for overseeing and monitoring grant activities funded by the local 50% share allocated to participating LEAs as well as the intra-state grant programs and statewide procurements funded from the 50% of the grant retained by the State Education Department. Our monitoring activities focus on both program implementation and fiscal management. Below is a chart that summarizes New York's framework for monitoring and the tools and protocols used. Some of these tools are designed and being implemented; others are still under development. Each element of our framework will be described in more detail in subsequent sections of this plan.

### SUMMARY OF NEW YORK STATE'S RTTT OVERSIGHT AND MONITORING ACTIVITIES

Entity	Program Oversight and Monitoring	Fiscal Oversight and Monitoring
<b>Participating LEAs</b> (50% Local Share)	<ul style="list-style-type: none"> <li>• Scope of Work Approval</li> <li>• Annual Performance Report Review/Analysis</li> <li>• Implementation Surveys</li> <li>• Network Team Performance Metrics</li> <li>• Network Team Institutes Evaluations</li> <li>• Risk-based Site Visits</li> <li>• External Evaluation of Common Core Implementation</li> </ul>	<ul style="list-style-type: none"> <li>• Annual Budget Approval</li> <li>• Budget Amendment Approval</li> <li>• Annual Final Expenditure Report Approval/Analysis</li> <li>• OSA Risk-based Audits</li> <li>• ARRA 1512 Quarterly Reports</li> </ul>
<b>Vendors/Grantees</b> (50% State Share)	<ul style="list-style-type: none"> <li>• Progress Reports</li> <li>• Contract Compliance Protocols</li> <li>• Grantee Site Visits</li> <li>• Grantee Convenings/CoP</li> </ul>	<ul style="list-style-type: none"> <li>• Payment Approval Process</li> <li>• Final Expenditure Report Approval/Analysis</li> <li>• ARRA 1512 Quarterly Reports</li> </ul>

Overlaid on this framework is the concept of managing risk. Given that there are 690 participating LEAs with four-year allocations ranging from \$1,400 to more than \$256 million as well as 20 statewide procurements and a dozen grant programs with multiple grantees, the State must allocate its monitoring resources in a manner that focuses on subrecipients that may have the greatest challenges and/or least capacity to manage their RTTT funds and program initiatives.

The graphic below illustrates how NYSED has incorporated “risk” into our monitoring of participating school districts and charter schools.



NYSED’s approach to monitoring subrecipients of funds from the 50% State share begins with the Request for Proposals (RFPs). Regardless of whether NYSED is providing a grant opportunity or soliciting a procurement, the RFP establishes clear statements of desired program outcomes (for grants) or the specifications for the products and services the Department seeks to purchase (for procurements). When soliciting proposals under its RFPs, the Department always adheres to the New York State Procurement Lobbying Law, the Office of the State Comptroller policies, and our own internal controls that collectively are designed to ensure objective, unbiased and fair reviews of all proposals received.

NYSED’s RFPs also establish explicit reporting requirements and delineate payment processes for both grants and procurements. In the case of procurement RFPs, payments are most often tied to the completion of specific deliverables on a schedule and in accordance with acceptance standards determined by the State Education Department. Contracts that result from successful proposals always contain clauses that allow NYSED to terminate a vendor’s work for cause and with due notice.

### LEVEL 1

During the first quarter of Year 1, under the leadership of the RTTT Performance Management Office (PMO), the State Education Department developed the templates and guidance documents for completing the four-year Scope of Work plans and budgets (Attachments A-E). NYSED provided extensive support to participating LEAs as they completed their Scope of Work documents. The Department communicated the Regents reform priorities and RTTT policies and procedures through a series of webcasts, regional presentations, field memos, frequently asked questions and other information posted at the Department's RTTT website <http://usny.nysed.gov/rttt/>.

Participating LEAs were required to submit their Scope of Work plans and budgets through an expanded online portal used for other ARRA reporting purposes. This electronic submission process allowed the Department to build in automatic edit checks and other internal controls to help ensure compliance with NYSED policies (e.g., 15% Year 1 budget cap, 25% apportionment for Teacher/Leader activities, etc.) and to promote accuracy and completeness in documents LEAs were submitting. NYSED staff reviewed submitted Scope of Work plans and budgets according to established protocols (Attachments F-G). Once approved by NYSED staff, the Scope of Work documents became the baseline data set against which subsequent reporting and expenditures would be analyzed to assess compliance with grant requirements and Department policies as well as to gauge progress toward State and local performance goals.

Upon NYSED approval of their submitted budgets, LEAs may expend funds as needed and are required to file their requests for reimbursement of RTTT expenditures separately from the ARRA Reporting System using an FS-25 paper reimbursement form to the Department's Grants Management Office. NYSED requires LEAs to submit their actual expenditures in relation to their original approved budgets. Once submitted, Grants Management staff then review the requests, compare the request to the LEA's budget and, if expenditures are appropriately documented, authorizes payment to the LEA.

Additionally, the State Comptroller has issued guidance directing school districts to adapt their current financial accounting system, if necessary, to be able to separately identify RTTT funds, similar to current federal funds accounting requirements. A new revenue account code has been created - F4289 - to report the ARRA revenues on the annual financial reporting document ST-3. ARRA funds received from RTTT must be recorded in the Special Aid Fund as revenue account code F4289 for all ARRA spending provisions under RTTT. For additional information relative to account codes for ARRA, please refer to <http://usny.nysed.gov/arra/>

At the end of Year 1, the State Education Department designed and built additional functionality into the online portal to include electronic submission of an Annual Performance

Report (APR) and an Final Expenditure Report (FER). The template for the APR (Attachment H) mirrors the template of the Scope of Work plan so that the Department can efficiently compare planned vs. actual activities. The FER mirrors the budget template (Attachment I) so that the Department can compare budget vs. expenditures. These two analyses allow the Department to document statewide trends in progress and fiscal management practices and identify variances from those trends. The fiscal modules of the online system have additional embedded controls. The system does not allow a participating LEA to make changes to its approved annual budget without first getting approval for a budget amendment. Also, LEAs cannot submit a budget for an upcoming year without first closing out the prior year to ensure for timely reporting and filing of reimbursement claims. FER reports are approved by RTTT PMO staff following established protocols (Attachment J).

All participating LEAs must also submit “1512 Quarterly Reports” through the online portal to comply with ARRA reporting requirements regarding expenditures, use of contractors and jobs created or saved (Attachment K). These reports are reviewed and approved by staff in the RTTT PMO following established protocols (Attachment L).

Early in Year 2, NYSED’s desk review and analysis capability of the basic planning and reporting information being submitted by all participating LEAs was significantly expanded with the appointment of a full-time project assistant dedicated to subrecipient monitoring and support. Maintaining this “single point of contact” for all LEAs has proven exceptionally helpful in ensuring that LEAs have a clear understanding of how to comply with NYSED reporting requirements, thus helping to minimize reporting errors and improving the timeliness and accuracy of submissions from the field. This additional staff has also strengthened the Department’s oversight by augmenting the PMO’s capacity to generate and analyze summary reports of subrecipient reporting and activities.

## **LEVEL 2**

The State Education Department plans to begin conducting site visits to select RTTT participating LEAs during the 2012-13 school year. Some of these site visits will be fiscal and internal controls audits conducted by the Department’s Office of Audit Services; others will be programmatic in nature and conducted by the Office of P-12 Education’s new Network Team Implementation Team.

The site visits begin in Year 3 of the grant for two reasons. First, the Department focused its Year 1 and Year 2 efforts on building its staffing capacity to do this work and on the planning and reporting system previously described. The information contained in this system was a prerequisite for assessing the risk profile for each LEA needed to identify which of our 690 participating LEAs to visit. Second, the Department, again using a risk management framework, determined that there was minimum fiscal risk associated with the Race to the Top subrecipient grants in Years 1 and 2. There were fewer subrecipient funds budgeted and expended during Year 1 (the ten month period between late September 24, 2010 and June 30, 2011), since LEA activity focused on the development of their Scope of Work documents and formation of their

Network Teams. During Year 2, many LEAs spent their annual budgets to support their Network Team's participation in the intensive professional development sessions (monthly Network Team Institutes) sponsored by the State Education Department.

In preparation for the fiscal and internal controls site visits, the Office of Audit Services has conducted a comprehensive risk assessment of all participating school districts and charter schools (Attachment M). The methodology quantified and weighted risk based on certain factors related to subrecipient's fiscal condition, timeliness of reporting, results of external audits including OAS audits of ARRA funds, and results of A-133 single audits of federal funds. The specific risk factors included in the OAS assessment included:

- Total ARRA Race to the Top Funding
- Unreserved, Undesignated Fund Balance (09-10)/Unassigned Fund Balance (10-11)
- Total ARRA RTTT Funding as % of 10-11 Budget
- Fund Balance Subject to Real Property Tax Limit as % of Following Year's Adopted Budget 10-11
- Opinion on Financial Statements as "Qualified"
- Report on Internal Controls
- Financial Statements Received After 30 Day Grace Period
- A-133 Received Late
- A-133 Corrective Action Plans and Corrective Action Plans for other audits received late
- Number of Findings for All Audit Reports by OSC, OAS, Federal Government, and Other State Governments
- Single Audit ARRA Findings
- Reporting Not Timely, 1512 Reports Inaccurate, Separate Account Codes, and Cash and Interest Income
- RTTT Activity Type from Online Budget (Funds budgeted for School Turnaround)

The risk assessment identified 27 subrecipients with potential higher fiscal risk in administering RTTT funds. Of those 27 LEAs, 19 have been awarded a four-year grant of more than \$250,000. The specific LEAs to be visited and the schedule of those visits will be included in OAS's Annual Audit Plan which is projected to be reviewed by the Board of Regents Committee on Audits/Budget and Finance and approved by the Department's Executive Deputy Commissioner in October 2012. These fiscal site visits will concentrate primarily on allowable uses of funds to ensure that grant subrecipients are in compliance with the federal cost principles defined by OMB Circular 87.

The OAS fiscal and internal controls audits of RTTT subrecipients will result in one or more of several possible outcomes:

- The audit will not identify any material findings;

- The audit will identify some material findings of a minor nature resulting in a report that contains recommendations for LEA management to modify existing internal control or expenditure processes; and/or
- The audit will identify substantial findings of material fact resulting in a report and possible NYSED response of withholding future RTTT funds if satisfactory corrective action is not taken in a timely manner.

For each outcome a report will be issued to the LEA's Board and Management. The LEA is required by New York State Education Law to submit a corrective action plan to the Commissioner of Education within 90 days of the issuance of the final audit report. The Corrective Action Plans will be reviewed by OAS as well as program staff to ensure findings are addressed.

OAS's RTTT subrecipient audits will be a factor in enhancing overall LEA accountability for the use of the RTTT funds going forward. All final reports will be posted on the State Education Department's website for public inspection. Findings will be used by NYSED to enforce corrective actions as needed to ensure full compliance with federal ARRA grant requirements.

During Year 3, NYSED will also undertake a limited number of program focused site visits. The purpose of these on-site monitoring visits is several-fold:

- Assess the LEA's fidelity in implementing the Regents Reform Agenda; specifically the Common Core instructional shifts, Data-Driven Instruction, and the Teacher/Principal Evaluation system;
- Compare the LEA's activities to date to its work plan contained in its Scope of Work and provide technical assistance to help the LEA address variances;
- Evaluate the role of local Network Team's involvement and impact in supporting the LEA with implementation of the Regents Reform Agenda;
- Identify implementation challenges at the LEA level in order to improve the ongoing training, support, and technical assistance provided by the Department to the field; and
- Recognize promising practices for sharing statewide through various communications means including Network Team Institutes and posting on EngageNY.org.

LEAs selected for site visits will be informed that they will be visited and provided with the monitoring protocols the Department will use. The visit will include interviews with LEA administrators and teachers, classroom observations and walkthroughs. The site visits will also include a review of relevant records and materials to primarily determine the LEA's compliance with appropriate laws, regulations, and the provisions of contracts and grant agreements. Following the monitoring visit, Department staff will share with the LEAs the results of monitoring findings allowing 30 days for school districts to provide a response. NYSED staff will incorporate district comments in a final report to be mailed to the school superintendent/charter school CEO, posted on the Department's ARRA website and retained in NYSED's files.

LEAs will be selected for on-site monitoring visits based on a combination of programmatic risk factors that may include, but not be limited to: number and complexity of activities in an LEA's Scope of Work, results submitted in an LEA's RTTT Annual Performance Report, trends in the LEA's student assessment results, progress reports from the LEA's Network Team, and results from surveys administered by NYSED. A number of the risk factors for selecting LEAs to be visited will be derived from the Department's Level 1 monitoring efforts. Other risk factor data will come from surveys administered in Year 2 and going forward.

## **SURVEY RESEARCH**

The first survey undertaken was conducted in conjunction with the Department's School Year 2011-12 Intermediate Level Monitoring for Title I Schools (Attachment N). The protocols for these monitoring site visits included a survey asking LEA administrators to: a) rate the progress of their Network Team against the three expected deliverables of these teams for 2011-12; and b) describe the actions the LEA has taken as early implementation of the Regents Reform Agenda (Attachment O).

A more comprehensive survey research plan was initiated in late spring 2012 with the objective of assessing the effectiveness of the professional development provided by the Network Teams and the impact this training has had in the field. The focus on Network Team effectiveness was warranted since NYSED designed these teams to be the major "delivery system" for the professional development needed to implement the ambitious Regents Reform Agenda. Year 1 of the RTTT grant was devoted to establishing approximately 200 Network Teams and Year 2 focused on providing essential training to Network Team members so they could be positioned to turnkey the training locally. Now that the Network Teams have some experience in delivering services directly to schools, it was important to begin to build a systemic approach to monitoring and oversight that is both statewide in scope and would gather data on experiences at the local level from a variety of perspectives.

The State Education Department administered two separate, but related, online statewide surveys (Attachments P-Q) were designed and administered at end of the 2011-12 school year. Both surveys, although differentiated by role (e.g., school building principals and Network Team members), asked similar questions about:

- The quality and fidelity of the initiatives in the field;
- The breadth and scope of the training in the field in three areas (Common Core Standards in ELA and Math, Data-Driven Instruction, and Teacher/Principal Evaluation; and
- The level of effectiveness of the turnkey training to the field.

Specific questions ask school building principals to assess their level of personal familiarity with the three areas and to evaluate the quality and relevance of any professional development they have received. They were also asked to identify "artifacts" they could provide to NYSED on a site visit as evidence of their districts' implementation efforts. Network Team members were

asked to provide details on the training they are providing locally, identify obstacles that put their efforts at risk, assess whether they are on track to meet the milestone for deliverables<sup>1</sup>, and what additional resources they have found helpful. Findings from these surveys will be used by NYSED to identify trends to craft additional guidance to the field, refine NYSED-sponsored initiatives, and identify LEAs for site visits.

## Network Teams

In our application, New York State committed to establish a robust system of “Network Teams” to support schools across the state to implement the Regents Reform Agenda. Network Teams would assist schools, through turnkey training and coaching, as they:

- Implement the Common Core standards and align instruction to the new standards;
- Implement the State’s comprehensive assessment program and adapt to more rigorous performance-based assessments;
- Establish school-based inquiry teams to analyze student performance data and make adjustments to instructional practices; and
- Implement the new teacher/leader evaluation system, especially in regards to evidence-based observation.

Now that NYSED has provided a year of professional development to Network Teams members and they have begun turn-keying this training directly to schools, it is essential that NYSED transition its focus. This shift is from largely providing professional development to one that balances on-going professional development with implementation technical assistance and accountability. NYSED has begun the work to strengthen its accountability initiatives in two key aspects. First, the responsibilities of the NYSED’s Network Team staff are expanding to include monitoring and assessing implementation. Second, the Department will enhance its survey research methodology begun in Year 2.

### **NETWORK TEAM IMPLEMENTATION TEAM**

With approval of an amendment to our State Scope of Work by the U.S. Department of Education, NYSED is establishing an expanded Network Team unit, which will be renamed the Network Team Implementation Team to recognize a shift in focus described above. This team will have three main responsibilities:

1. Planning and implementation of all Network Team Institutes (continuation of current responsibilities);
2. Providing technical assistance and support to Network Teams in the delivery of turnkey training and other services to school districts (a natural maturation of Year 1 and 2 activities); and

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<sup>1</sup> As described in the NYSED publication, *Network Teams: Deliverables, Metrics, and Evidence for SY 2011-12*.

3. Assessing the effectiveness of Network Team efforts and gathering data on LEA implementation of Common Core Standards, Data-Driven Instruction, and the Teacher/Principal evaluation system (new responsibility).

To fulfill this new third responsibility, the Network Team Implementation Team will conduct several specific activities including, but not limited to:

- Design and administer a comprehensive statewide survey research plan; analyze results;
- Conduct site visits as described in the previous section;
- Design, create and implement reporting structures, monitoring rubrics for both Network Teams and participating LEAs;
- Evaluate the quality and relevance of Network Team Institutes to inform planning for subsequent Institutes;
- Examine student assessment results data for evidence of measurable improvements that could be attributed to implementation of Common Core Standards, Data-Driven Instruction, and Teacher/Principal evaluations; and
- Use results from monitoring activities to inform the development of statewide systems to sustain best practices beyond the RTTT grant period.

## **ENHANCED SURVEY RESEARCH**

The State Education Department developed a set of expected deliverables and performance metrics for the initial year of Network Team operations, School Year 2011-12 (Attachment R), which was the basis for the implementation surveys administered in the spring of 2012. NYSED has since updated and expanded this document for school year 2012-13 (Attachment S). The new version includes implementation metrics related specifically to Common Core State Standards (CCSS) implementation, alignment of CCSS and Annual Professional Performance Review (APPR), APPR implementation, and implementation of Data-Driven Instruction (DDI). The metrics are also calibrated for different roles: LEA Superintendents, Network Teams, and District Superintendents (BOCES). The Vision and Metrics document forms the basis for several new survey and implementation assessment tools:

- *Overview of District Implementation Efforts Survey* (Attachment T): A survey being administered this summer by Network Teams to directors of professional development or curriculum for their component LEAs.
- *Superintendent Worksheet for Completing the District Implementation Readiness Rubric* (Attachment U) and the *District Implementation Readiness Rubric* (Attachment V): A district-level tool to assist LEA superintendents in assessing their districts' readiness to implement the CCSS instructional shifts and their progress in doing so along each of the focus areas of the performance metrics mentioned above.
- *District Superintendent (BOCES) Regional Implementation Analysis* (Attachment W): Based on the LEA Superintendents' assessment results, BOCES District Superintendents will prepare and submit to NYSED a regional assessment summary reflecting the implementation status of all their component districts.

Additional surveys and assessment tools will be developed by the Network Teams Implementation Team as warranted. The Implementation Team will also be responsible for incorporating the findings of these new survey and assessment tools into all the other analysis of implementation progress and student results that the team will be undertaking.

### **COMMON CORE IMPLEMENTATION**

In addition to on-site reviews, NYSED will contract with a vendor to conduct a third-party evaluation of LEA implementation of key components of the State's Common Core-driven agenda; specifically, the degree to which teachers have successfully incorporated Common Core State Standards and instruction in the classroom, the extent to which LEAs have accommodated these changes organizationally and, finally, student performance on Common Core aligned standardized summative assessments. Institution-specific results from this evaluation will be used to validate and substantiate findings from on-site visits and audits and to identify performance trends that will alert NYSED Network Team Implementation Team members to share important findings with the field and provide targeted technical assistance to address outstanding performance issues.

### **STATEWIDE EVALUATION OF NYS INTERVENTIONS INTO LOW PERFORMING SCHOOLS**

In September 2011, NYSED selected a vendor to evaluate the statewide implementation of:

- School intervention models and the impact on student achievement from implementation of improvement approaches in identified Persistently Lowest Achieving (PLA)/Schools Under Registration Review (SURR) schools.
- Interventions in Differentiated Accountability (DA) Improvement, Corrective Action and Restructuring phases and categories of the State accountability system and the impact on student achievement and implementation of improvement approaches in identified schools.

Specifically, the contractor is addressing several interrelated but distinct evaluation components and assessments including:

1. The implementation of school intervention models, the effectiveness of interventions and improvement approaches, and the impact on student achievement in PLA/SURR schools;
2. The implementation of DA phase and category requirements, the effectiveness of interventions and improvement approaches and the impact on student achievement in identified schools in New York State;
3. Annual formative and summative assessments of implementation in these schools and districts; and
4. A three-year trend analysis for all outcome measures.

Although this contract runs through the life of the RTTT grant, the contractor is providing NYSED's Office of Accountability with quarterly progress reports, annual reports and is providing other deliverables as required in the Request for Proposals.

In New York's *State Scope of Work*, the State Education Department committed to using the 50% share of the RTTT grant to launch several grant programs and fund a number of procurement contracts. In the shortened Year 1 period of the RTTT grant (September 2010 – June 2011), NYSED concentrated its efforts on developing and issuing Request for Proposals (RFPs) as required by the State's procurement rules and regulations. While NYSED issued several RFPs in Year 1, these did not result in any contracts or grant awards being made due to the timeframes of the required processes. In Year 2, NYSED awarded six procurement contracts and made awards under two grant programs.

There will be a significant increase in both contracts and grant awards during Year 3. In total, over the four-year period, more than \$170,000,000 of the State's share will be used to provide grants to school districts, charter schools and postsecondary institutions across several of the Assurance Areas. Almost another \$150,000,000 of the State's share will be used to purchase products and services (e.g., sample curriculum modules, professional development on the new State teacher/leader evaluation system, the Education Data Portal, etc.) that will have long-term benefits to schools and students beyond the life of the RTTT grant.

In anticipation of the increased numbers of contracts and grant awards, the State Education Department has expanded its online reporting system so that vendors and grantees can submit 1512 ARRA Quarterly Reports similar to what participating LEAs have been doing since the start of the RTTT grant.

### **COORDINATOR FOR CONTRACT PERFORMANCE MANAGEMENT**

NYSED has also hired a full-time, dedicated Coordinator for Contract Performance Management who works as part of the RTTT Performance Management Office (PMO). The Coordinator is assisting program office staff who work directly with contractors and grantees to ensure that all RTTT-funded state contracts and grant programs are overseen in a consistent manner, generate the anticipated deliverables or program outcomes consistent with contract-defined quality standards and that all ARRA/RTTT required reporting is completed accurately and in a timely fashion.

The Coordinator is working with other staff in the RTTT PMO to develop a comprehensive training manual for grant/vendor contract administration and monitoring. The manual will be used to educate internal program staff on how to monitor vendor performance through fiscal and progress reports; establish and maintain a continuous meeting schedule for updates, issues, or concerns; develop internal tracking system for reports and payments; and understand and apply federal and state guidelines (ARRA, OMB Circulars A-31 and A-33) in the administration of the contract. All training materials will be housed on the Department's intranet for future reference as a resource during the RTTT contract.

In addition to the staffing training initiatives, the Coordinator will participate in vendor meetings to ensure contract compliance and service delivery guidelines are met; address any budgetary and reimbursement inquiries, and develop reporting structures to complement service delivery schedules. The oversight of vendor service may occur via on-site monitoring of activities; however, due to State-mandated travel restrictions, oversight will primarily be implemented through conference calls, web-based meetings, and written reports (both progress and fiscal).

## **OVERSIGHT PROTOCOLS**

NYSED employs various strategies to provide oversight and conduct monitoring of vendor/grantee recipients of RTTT funding from the State 50% share. These strategies comply with federal and state regulations for the administration of federal funding. The process for awarding funds is similar for grants and procurements.

Initially, NYSED develops and issues a Request for Proposals (RFP) that becomes an executable contract with a vendor (for procurements) or an award notification (for grantees). All contracts include explicit language regarding the State Education Department's expectations for performance. All proposals received in response to RFPs are evaluated against objective criteria (typically related to the quality of proposed work plans, organizational capacity to deliver, and reasonableness of budget, among others). Once a vendor or grantee is selected, a contract is prepared. All contracts and grant awards must first be approved by the Office of the State Attorney General and the Office of the State Comptroller before projects can begin.

Contracts and grant awards provide explicit expectations for the delivery of products and services or grant activities as well as a calendar of activities or milestones for deliverables, payment schedule, and reporting requirements. Once contracts/grant awards are in place, the vendors/grantees are invited to an orientation to meet with NYSED program staff for a brief overview of the contract and fiscal and program delivery expectations. The vendors/grantees are introduced to the various reporting and payment requirements.

The vendor submits deliverables and invoices according to schedule and the NYSED program office contract manager reviews and accepts deliverables based on established quality standards. Invoices are then forwarded to NYSED's Grants Management Office for payment. Grantees submit requests for reimbursement of expenditures on a schedule specified in the RFP. The program office grant manager reviews the reimbursement claim compared to the previously approved work plan and budget. When approved by the program office, the reimbursement claim is submitted to the Grants Management Office for payment.

In addition to payment criteria, the vendors/grantees are responsible for reporting on services provided and activities performed in a progress report. Standard contract language for grants/procurements is a quarterly reporting schedule; however there may be instances where only an annual report may be required. In addition to the quarterly report, the vendor/grantee

is required to submit information in compliance with 1512 ARRA reporting requirements regarding expenditures and jobs created or saved. Vendors and grantees use the same online ARRA reporting system that LEAs use when submitting their 1512 reports.

Vendors and grantees are expected to submit an Annual Performance Report (APR) as required by the federal Race to the Top grant. The APR is due December 2014, which is 90 days from the grant closing date of September 2014. The vendors/grantees will be notified to complete their APR within the same delivery period, but with an appropriate amount of time for NYSED to submit its required grant closeout reports. The vendors/grantees billing cycle may end within 30 days from the grant closing date, thus allowing them to complete their APRs by October 2014.

If at any time during the contract/grant period, the Department determines that the vendor or grantee is out of compliance with contract terms, NYSED can, at its discretion, decide to terminate the contract/grant and stop payment. This is a standard clause attached to every RFP issued by NYSED and included in every contract approved by the State Attorney General and the Office of the State Comptroller (Attachment X).

## Conclusion

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This Subrecipient Monitoring Plan describes NYSED’s process for overseeing and monitoring grant activities funded by the local 50% share allocated to participating LEAs as well as the intra-state grant programs and statewide procurements funded from the 50% of the grant retained by the State Education Department. Our monitoring activities focus on both program (to assess progress related to CCSS, DDI and TLE implementation) and fiscal management (to evaluate compliance with federal cost principles defined by OMB Circular 87). Overlaid on this framework is the concept of managing risk. Given that there are 690 participating LEAs with four-year allocations ranging from \$1,400 to more than \$256 million as well as 20 statewide procurements and a dozen grant programs with multiple grantees, the State is allocating its monitoring resources in a manner that focuses on subrecipients that may have the greatest challenges and/or least capacity to manage their RTTT funds and program initiatives. Some of the tools to be used in this work are designed and being implemented; others are still under development.

## Attachments

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Attachment A	Guidance for Developing LEA Scope of Work
Attachment B	LEA Scope of Work Template
Attachment C	LEA Activity Level Annual Budget Template
Attachment D	Request to Certify a Network Team Equivalent
Attachment E	Teacher and Principal Evaluation System Implementation Certifications
Attachment F	LEA Scope of Work Reviewer Checklist
Attachment G	LEA Activity Level Annual Budget Reviewer Checklist
Attachment H	LEA Annual Performance Report Template
Attachment I	LEA Annual Final Expenditure Report Template
Attachment J	LEA Annual Final Expenditure Report Reviewer Checklist
Attachment K	ARRA 1512 Quarterly Report template for Race to the Top
Attachment L	ARRA 1512 Quarterly Reporting Approval Process Checklist
Attachment M	NYSED Office of Audit Services Fiscal Risk Assessment: Summary
Attachment N	Title I Districts Subject to Intermediate Level Monitoring
Attachment O	SY 2011-12 Site Visit RTTT Survey (done as part of the site visits to Selected Title I Districts – see Attachment N)
Attachment P	SY 2011-12 Implementation Surveys: School Building Principals
Attachment Q	SY 2011-12 Implementation Surveys: Network Team Members
Attachment R	Network Teams: Deliverables, Metrics, and Evidence for SY 2011-12
Attachment S	Draft Vision and Metrics for Implementing CCSS, APPR and DDI for SY 2012-13
Attachment T	Overview of District Implementation Efforts Survey
Attachment U	Superintendent Worksheet for Completing the District Implementation Readiness Rubric
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Attachment X	RTTT Requests for Proposals – Sample Language Regarding Reporting and Payment Requirements