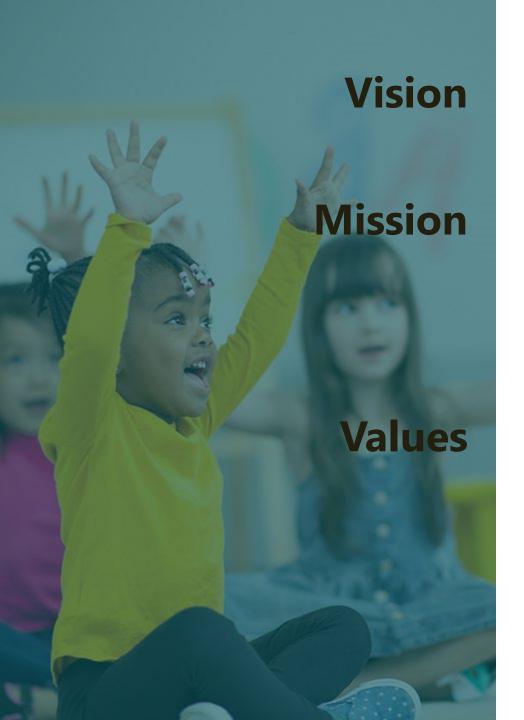
# Program Review & Support (PRS)

August 29, 2023 | 9-11 AM



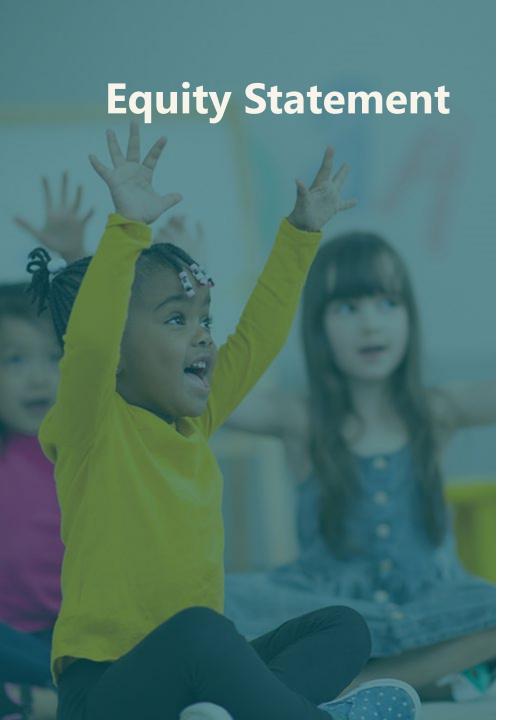


All students prepared for post-secondary pathways, careers, and civic engagement.

Transform K–12 education to a system that is centered on closing opportunity gaps and is characterized by high expectations for all students and educators. We achieve this by developing equity-based policies and supports that empower educators, families, and communities.

- Ensuring Equity
- Collaboration and Service
- Achieving Excellence through Continuous Improvement
- Focus on the Whole Child





Each student, family, and community possesses strengths and cultural knowledge that benefits their peers, educators, and schools.

Ensuring educational equity:

- Goes beyond equality; it requires education leaders to examine the ways current policies and practices result in disparate outcomes for our students of color, students living in poverty, students receiving special education and English Learner services, students who identify as LGBTQ+, and highly mobile student populations.
- Requires education leaders to develop an understanding of historical contexts; engage students, families, and community representatives as partners in decision-making; and actively dismantle systemic barriers, replacing them with policies and practices that ensure all students have access to the instruction and support they need to succeed in our schools.

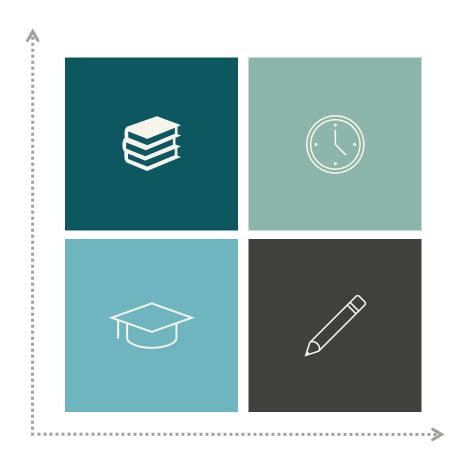


#### Tribal Land Acknowledgement

I would like to acknowledge the Indigenous people who have stewarded this land since time immemorial and who still inhabit the area today, the Steh-Chass Band of Indigenous people of the Squaxin Island Tribe.



# Agenda



- Welcome, Introduction and Land Acknowledgement
- Program Review and Support
- Program Review
- Timeline
- Checklist and Determinations
- Title III/TBIP
- Fiscal
- Civil Rights
- Education Grant Management System (EGMS)
- Program Review and Support Resources
- Q&A



#### **OSPI Presenter Contacts**

- Jason Miller, EELFP Executive Director
- Dr. Yesenia Rodriguez, Federal Program Assistant Director
- Deifi Stolz, Methods of Administration Program Supervisor
- Tony May, Rural Education Program Supervisor
- Debbie Crawford, Lead Federal Compliance Specialist
- Sue Connolly, Title III/TBIP Program Supervisor
- Kasha Roseta, Equity and Civil Rights Program Attorney



# Program Review & Support (PRS) formerly Consolidated Program Review (CPR)



#### Program Review & Support (PRS)

A complete oversight process that allows OSPI programs to differentiate oversight based on the needs of the LEA.

Includes a Continuum of oversight: Acknowledges that all interactions are part of the oversight (e.g., application, guidance, Reviews, etc.).

Focuses on impacts on students

Partnership perspective: Not a "gotcha" but a "How can we support you?"



# Continuum of Oversight





# Program Review & Support



Program Review

Self-Assessment

#### Self-Assessment

A universal review of self-reported items

#### Program Review

 Next level review of no more than 60 LEAs at the top of the Program Support Assessment

#### Focused Support

 Programs may need to provide additional supports to a particular LEA. Virtual or On-site (this tier of support is under development this year. Visit the webpage for more information.)



# Program Review & Support: Self-Assessment

Focused Support

Program Review

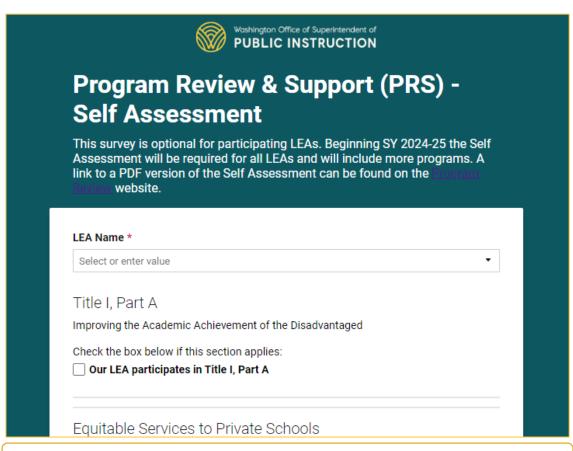
Self-Assessment

#### **Self-Assessment**

- An annual, universal self-report via
   Smartsheet (optional for first two years)
- Items removed from the Program Review checklist and added onto this Self-Assessment.
- OSPI uses this information to update & revise guidance and supports to LEAs in general.



#### Self-Assessment Pilot



#### **Self-Assessment**

- The Self-Assessment is optional for the next two years
- Because we removed some items from the Program Review checklists, we ask you to consider the items in the Self-Assessment
- Specifically, we invite you to review the Civil Rights items in the Self-Assessment and ensure they are fully implemented.
- You can use the link below to complete the Self-Assessment.

https://app.smartsheet.com/b/form/804beaa46e4d4206a592db9f5c136909



# Program Review & Support: Program Review

Focused Support

**Program Review** 

Self-Assessment

#### Program Review

- 30 LEAs with this highest score on the **Program Support Assessment** were selected this year.
- The first 15 LEAs will participate in a **Full Review** (meaning all applicable programs—up to 15 programs will be reviewed).
- Remaining 15 LEAs selected for Limited Review (up to half of a Full Review. No more than 8 programs).





# Program Review

# Program Review

- Title I, Part A
- Title I, Part C
- Title I, Part D
- Title II, Part A
- Title III, TBIP
- Title IV, Part A
- Title V, Part B Rural Education

- Homeless Education
- Career and Technical Education/Perkins
- Private Schools
- Civil Rights
- Fiscal
- School Improvement (OSSI)
- Foster Care
- Tribal Consultation



# LEAs Selected for 2023-24 Program Review

- Bainbridge Island School District
- Centralia School District
- Dieringer School District
- Easton School District
- East Valley School District (Yakima)
- Entiat School District
- Goldendale School District
- Grapeview School District
- Griffin School District
- Kelso School District
- Lumen Public School
- Mansfield School District
- Manson School District
- Methow Valley School District
- Naches Valley School District

- Napavine School District
- Nespelem School District
- Orondo School District
- Orting School District
- Palisades School District
- Pioneer School District
- Rainier School District
- Ridgefield School District
- Skykomish School District
- Tahoma School District
- Toutle Lake School District
- Vashon Island School District
- Waterville School District
- Wilson Creek School District
- Yakama Nation Tribal Compact





# Timeline

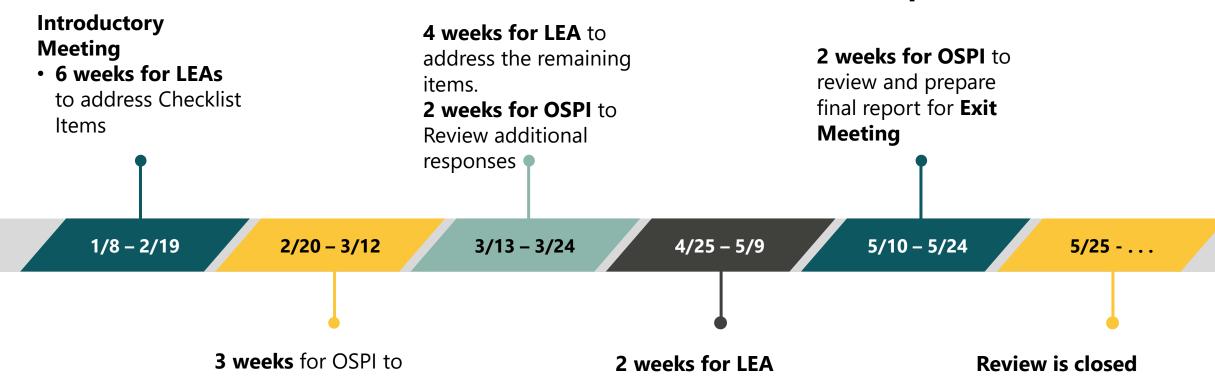
# Program Review & Support Meetings

There will be three key meetings intended to discuss PRS processes, determinations, and to address questions and/or concerns.

- Introductory Meeting
- Preliminary Meeting
- Exit Meeting (optional)



#### LEA Review Timeline Example



review responses before the Preliminary Report Meeting

2 weeks for LEATO submit *final* responses

LEA may follow-up on any Action Plans as they are completed by updating EGMS follow-up section



# Closing the Reviews

- All Reviews will close on the date of the scheduled (optional) Exit Meeting.
- Reviews will close even if all items have not been determined to be exemplar or fully implemented.
- Any items with a final determination other than "Exemplar" and "Fully Implemented" will receive a Risk Score.
- Risk Scores are one criteria used to select LEAs for future participation in Program Review & Support.



#### Program Review Follow Up

- LEAs with outstanding items at the Exit Meeting, will have the opportunity to move those items into Full Implementation status through a follow up process.
- LEAs will be able to lower their Risk Score through the followup process.
- Program Review follow up will occur in EGMS.
- More information regarding the follow up process will be provided by the OSPI Team Lead at the Exit Meeting.





# Checklists & Determinations

#### **Career & Technical Education (CTE)**

• Newly revised CTE checklist

Streamlined

- Previously there were ltems 12.1 through 12.7
- Now Items 12.1 through 12.5

Benefit

- Previously asked to provide the same information multiple times for different uses and reports
- Using effective tools and technology to ask for information one time, yearly

ltem	Description	Evidence	Actions Required
12.1	State CTE Approval/Frameworks The LEA improves the academic and technical skills of students participating in career and technical education programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant CTE programs to ensure a well-rounded education (Perkins V – Sec. 133 (b)(4)).  The LEA supports integration of academic skills into CTE programs and programs of study (Perkins V – Sec. 135 (b)(3)).  The LEA provides access to at least one CTE equivalency course (CTE High School Course equivalencies – RCW 28A.230.097).  The LEA meets state approval requirements through course and program approval. (Career and Technical Education – Plans – Standards – RCW 28A.700.010 – Career and technical education—Plans—Standards—Technical assistance—Leadership development).  Risk Level: 3	LEA Level  □ A. List of all CTE courses currently offered by a program area including application ID, proof of state approval, identification of any courses offered as state and/or local equivalencies identifying the type of academic credit offered, and Industry Recognized Credential (IRC) or dual credit for all preparatory courses. (See OSPI CTE PRS 12.1 Optional Resource.)  NOTE: The course approval ID number does not show approval of the course, only that the application has been submitted.	Actions Required



#### Determinations

#### **OLD-Program Monitor in EDS**

- 1. Compliant
- 2. Noncompliant
- 3. Evidence Needed
- 4. Action Plan Approved
- 5. N/A

#### **NEW-Program Review in EGMS**

- 1. Exemplar
- 2. Fully Implemented
- 3. Partially Implemented
- 4. Not Implemented
- 5. Evidence Needed
- 6. N/A

\*Action Plan needed for every item in *Partially*, or *Not Implemented* status at Exit.



#### Program Checklist Item Rubric

This rubric was used to determine a risk level for each items on every program checklist.

	1	2	3	4
Risk Level Determinations	<ul> <li>Low risk: (one of the following applies)</li> <li>has direct impact on student educational outcomes</li> <li>directly impacts equity, or educational opportunities</li> <li>potential for Civil Rights legal action</li> <li>can result in audit recovery of federal funds</li> </ul>	<ul> <li>Moderate risk: (two of the following apply)</li> <li>has direct impact on student educational outcomes</li> <li>directly impacts equity, or educational opportunities</li> <li>potential for Civil Rights legal action</li> <li>can result in audit recovery of federal funds</li> </ul>	<ul> <li>High risk: (three of the following apply)</li> <li>has direct impact on student educational outcomes</li> <li>directly impacts equity, or educational opportunities</li> <li>potential for Civil Rights legal action</li> <li>can result in audit recovery of federal funds</li> </ul>	<ul> <li>Highest risk: (four of the following apply)</li> <li>has direct impact on student educational outcomes</li> <li>directly impacts equity, or educational opportunities</li> <li>potential for Civil Rights legal action</li> <li>can result in audit recovery of federal funds</li> </ul>



#### **Determinations Defined**

- **Exemplar** The LEA has exceeded the minimum requirements and is implementing according to best practices. This LEA's implementation is an example for other LEAs.
- Fully Implemented The LEA has demonstrated implementation of all requirements for this item.
- **Partially Implemented** The LEA has demonstrated implementation of one or more of the subitems (Evidence) or a portion of the item but has not implemented all the requirements for this item.
- **Not Implemented** The LEA was unable to demonstrate implementation of the item or subitems.
- **Evidence Needed** There is not sufficient evidence to determine if the requirements are implemented. Additional evidence is needed to determine implementation status. Final determination status will be adjusted when the review closes to indicate implementation level.
- **N/A** The item does not apply to the LEA, or the item is not being reviewed.



# Title III/TBIP

Program Review 2023–24

Program 7



#### Section 7: TBIP & Title III Recipients

- Key focus: Meeting Civil Rights obligations & providing effective services for multilingual English learners
- Goal: To support LEA program development and continuous improvement
- Checklist is condensed/simplified and rearranged
- Major Sections: TBIP, Title III AI/AN, Use of Title III funds to supplement TBIP, Immigrant Grant, Dual and Heritage





# Tips for Section 7 TBIP & Title III Programs & Supplemental Funds

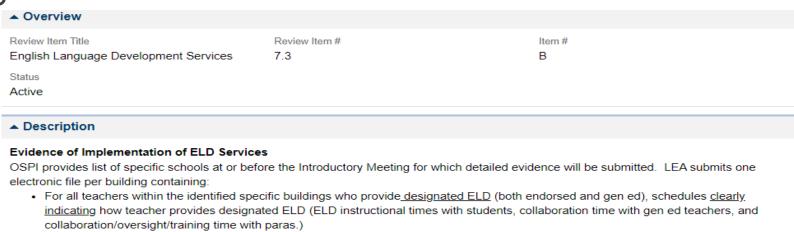


Image by **David** from **Pixabay** 



- Read the checklist items carefully. Details, resources, and relevant templates (optional) are provided
- Submit evidence for EACH element (labeled A, B, C etc. AND any associated bulleted items)
- OSPI will provide specific list of students SSIDs as well as identify 3 specific buildings for detailed staffing data at or before Introductory meeting

content provided across the building.



Description and evidence (images of visuals, strategies used, unit/lesson plan indicating targeted strategies, etc) of meaningful access to



# Services, Staffing, and Funding

- Services must meet Civil Rights Dual Obligation for all MLs
  - Multiple ways this can look based on context
  - Requires adequate system and structures: Patchwork "fixes" do not sustain nor meet requirements for effectiveness
  - If needed, define/describe the program then build the steps to full implementation across 1 to 3 years.
- Consider your staffing ratio (Number of EL endorsed Certs who provide ELD services: students – should be no more than 50 students per teacher) discuss how this will be addressed and create actionable steps to adequate staffing and effective services
- Use of supplemental TBIP & Title III funds is restricted by law.



#### Records, Data, Processes

- Maintain accurate, complete student files with all required documents!
- Manage the Possibly Eligible Not Reported list (EDS LEP Application Reports – Data Cleanup) regularly.
  - Many issues are solvable but not necessarily all. Contact program supervisors for support
- Create and follow **process guidelines** and share them with all staff responsible for various tasks **annually**.
  - Examples: Registration, data entry/clean up, communication processes with families, processes for eliciting family and community input, process to obtain annual board approval, etc.



#### Required Student File Documents

- HLS
- Screener official score sheet with date of administration
- Annual official test score sheets
- Parent notification letters
  - Initial placement sent once
  - Continued eligibility sent annually
  - Transition from services
- Written parent waiver/parent communications



# What if our evidence is weak or doesn't exist?

- Initiate the conversations among your team to create a plan for needed changes/improvements
- Work with your program supervisor as you create an action plan.
  - Supervisors read and approve grants based on assigned ESDs and work to deepen understanding of the reality within assigned districts. They are a good source of support for planning program improvements.
- Write clear, specific, actionable plans that move stepwise toward the targeted improvement(s)



#### **Useful Resources**

- Multilingual Learner Program Planning Template (<u>Transitional</u> <u>Bilingual Guidance Page/ Resources & Toolkits</u>)
- Meeting the Civil Rights Requirements for Multilingual Learners
- WA State Policies and Practices Guide



# Questions?



# Fiscal

# Program Review & Support 2023-24 Section 15

- Amy Harris, Director of Federal Fiscal Policy and Grants Management, OSPI
- Jamey Schoeneberg, Assistant Director of Federal Fiscal Policy and Audit Resolution, OSPI
- Debbie Crawford, Lead Federal Compliance Specialist, OSPI



#### **Item 15.1-Grant Claims and Expenditures:**

In addition to the items on the fiscal checklist, be sure to:

- Provide expenditure summary and detail reports (excluding benefits) for **all** federal grants included in the PR&S review that you made claims on for the school year under review (no state grants).
  - This includes Title I, Part A, Title I, Part C, Title I, Part D, Title II, Part A, Title III, Part A, Title IV, Part A, Title IV, Part B, Perkins, School Improvement, ESSER II, ESSER III, Title IX McKinney-Vento.
  - Even if you are having a limited review with selected programs, include all programs when submitting expenditure reports for fiscal.
- Provide an explanation and/or support of any differences between the grant claims and expenditure reports.

In this section, the reviewers look to make sure:

- The LEA has adequate controls to ensure grant claims are completed timely, reconcile to accounting records and were within the period of performance.
- Expenditure summary and detail reports agree to the Grants Detail (claims) reports.
  - Any variances are supported and reasonable.



#### **Item 15.2-Accounts Payable Charges:**

In addition to the items on the fiscal checklist, reminder to:

- Provide the procurement policy for the school year under review. Include self-certification documentation if utilized.
- Provide all relevant documentation for the transactions selected for review:
  - General disbursements: purchase requisition, purchase order and invoice/detailed receipts
  - Disbursements requiring informal or formal bid procedures, such as :
    - · Quotes received when informal bid procedures are used
    - Bid documentation when formal bid procedures are used
    - Final contract (fully executed = signed/dated)
  - Sole source justification
  - Family engagement activities: invitation (if applicable), agenda and sign-in sheet



#### **Item 15.2-Accounts Payable Charges:**

- In this section, the reviewers look to make sure:
  - The LEA has adequate internal controls to ensure federal expenditures are allowable, comply with procurement requirements, and vendors and subrecipients are not suspended or debarred.
  - Procurement policies have the most current bid thresholds when using federal funds and include language relating to conflict of interest and suspension and debarment.
  - Selected transactions are allowable, approved and supported by adequate documentation.



#### **Item 15.3-Payroll Charges:**

- In this section, we review to make sure:
  - The LEA has adequate internal controls to ensure payroll costs are accurate, allowable and properly allocated.
  - The time and effort for the selected employees:
    - Was the correct type, based on the cost objective(s) they worked on
    - Included the employee(s) name, reporting period and the cost objective(s) for all activities worked on (federal and non-federal)
    - Was signed/dated timely by the employee and/or the supervisor, as applicable, after the work was performed
  - Payroll costs charged to the program(s) agreed to the time and effort documentation
    - If payroll costs are based on budget, did the LEA make adjustments quarterly or annually, as needed



#### **Item 15.3-Payroll Charges:**

In addition to the items on the fiscal checklist, be sure to:

- Provide a monthly payroll distribution report for each employee/month selected for review
- Let us know if your LEA uses a substitute time and effort system (sampling or fixed schedule) that was approved by OSPI
- Provide schoolwide plans if the employees selected for review work in a schoolwide building and are charged to revenue sources in a schoolwide plan (include the identified budgets in the plan)



# **Program Review Resources**

OSPI Program Review webpage:

https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review

- OSPI Fiscal Program Review webpage: Fiscal Guidance | OSPI (www.k12.wa.us)
- Fiscal Program Review Report Examples:
  - Expenditure Summary Report:
    - https://www.k12.wa.us/sites/default/files/public/consolidatedreview/pubdocs/Instructions-Example%20for%20Expenditure%20Summary%20Report.pdf
  - Expenditure Detail Report:
    - https://www.k12.wa.us/sites/default/files/public/consolidatedreview/pubdocs/instructions-exampleforexpendituredetailreport.pdf.
  - Payroll Distribution Report:
    - https://www.k12.wa.us/sites/default/files/public/consolidatedreview/pubdocs/Instructions-Example%20for%20Payroll%20Distribution%20Report.pdf
  - For non-WSIPC LEAs, review examples and provide comparable data.



#### **Contact Information**

#### **Program Review Fiscal Contacts:**

- Amy Harris, Director of Federal Fiscal Policy and Grants Management (360) 688-0485 <a href="mailto:amy.harris@k12.wa.us">amy.harris@k12.wa.us</a>
- Jamey Schoeneberg, Assistant Director of Federal Fiscal Policy and Audit Resolution (360) 972-4025 jamey.schoeneberg@k12.wa.us
- Debbie Crawford, Lead Federal Compliance Specialist 360-789-6258 debbie.crawford@k12.wa.us



# Equity and Civil Rights

2023-24 Program Review & Support



# Federal/State Civil Rights Laws

- Apply to any Washington LEA that accepts federal/state funding.
- Prohibit discrimination based on actual or perceived membership in [protected class].
  - Race, color, and national origin
  - Religion and creed
  - Sex, sexual orientation, gender identity, gender expression,
  - Disability and use of a trained guide dog or service animal
  - Age
  - Military or veteran status.



# The Civil Rights Checklist

- Is **not** an audit or an investigation
- Covers a wide range of civil rights compliance requirements,
   but not every civil rights requirement is covered
- Focuses on the critical systems and processes the LEA has in place to prevent and address discrimination





# Who Should Be Involved?

# Primary Contacts

- Civil Rights Coordinator
- LEA's Program Review Lead

# Secondary Contacts

- Title IX Coordinator
- Gender-Inclusive Schools Coordinator
- Athletic Director



# Is There Some Sort Of Guide?

An updated **Technical Assistance Guide** will be posted in September. It will include:

- Tools and resources
- Model language (e.g., nondiscrimination statement, handbook language)
- Legal citations and guidance
- Tips for success



# What's The Difference Between the 2023-24 Checklist and the Self-Assessment?

#### Checklist

- Required in 2023-24
- Focused on systems, processes, and evidence of implementation

#### **Self-Assessment**

- Optional (but strongly encouraged) in 2023-24
- Focused on concrete requirements

Both are helpful tools for tracking your LEA's civil rights compliance!



# New(ish) To The Review!



Required policy and procedure (WSSDA's 3211 and 3211P, or equivalent)

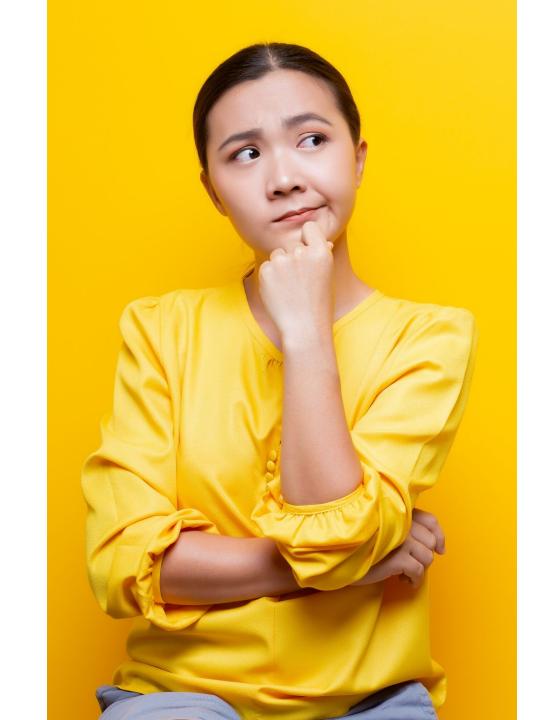
Trained primary contact (i.e., GIS Coordinator)

Student, parent, and employee notification



# 5 Tips for Success

- 1. Note the new checklist!
- 2. Differentiate between "evidence" and "descriptions."
- 3. Submit everything requested.
- 4. Use the TA Guide and the ECR website.
- 5. Know when (and who) to ask for help.





# Key Resources

- 2023-24 Civil Rights Checklist and Self-Assessment
- Technical Assistance Guide, coming in September!
  - Item-by-item explanations, lists, tools, resources, guides, etc.
- Your ECR Program Monitor
  - Please contact your monitor with any questions you have at any point during the review.



## Contact Us!

Equity & Civil Rights Office (360) 725-6162

equity@k12.wa.us







Education Grant Management System (EGMS)

# EGMS: Program Reviews

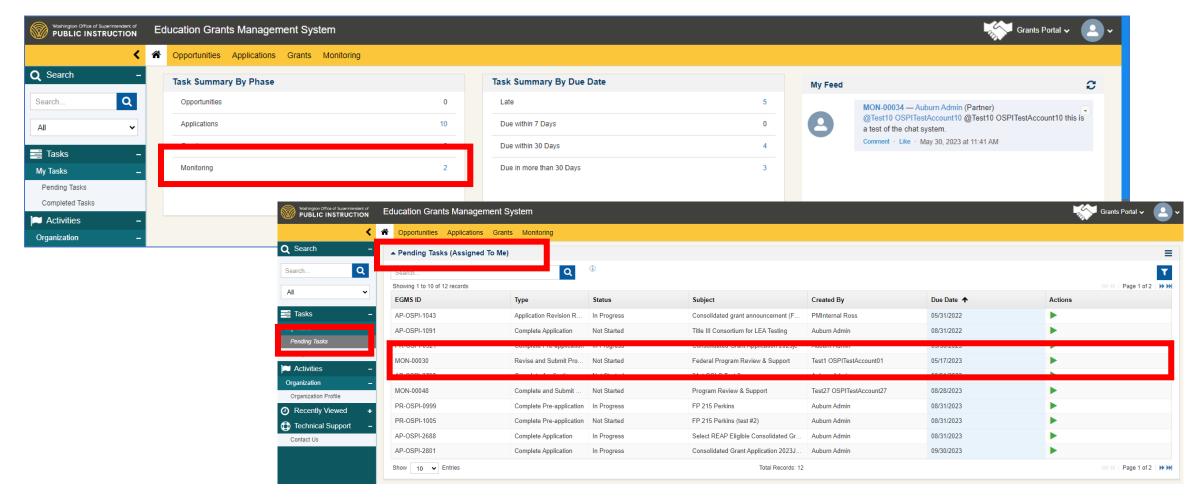
Organizations and LEAs

Part 1: Providing Initial Responses

(See full instructions in attached pdf)

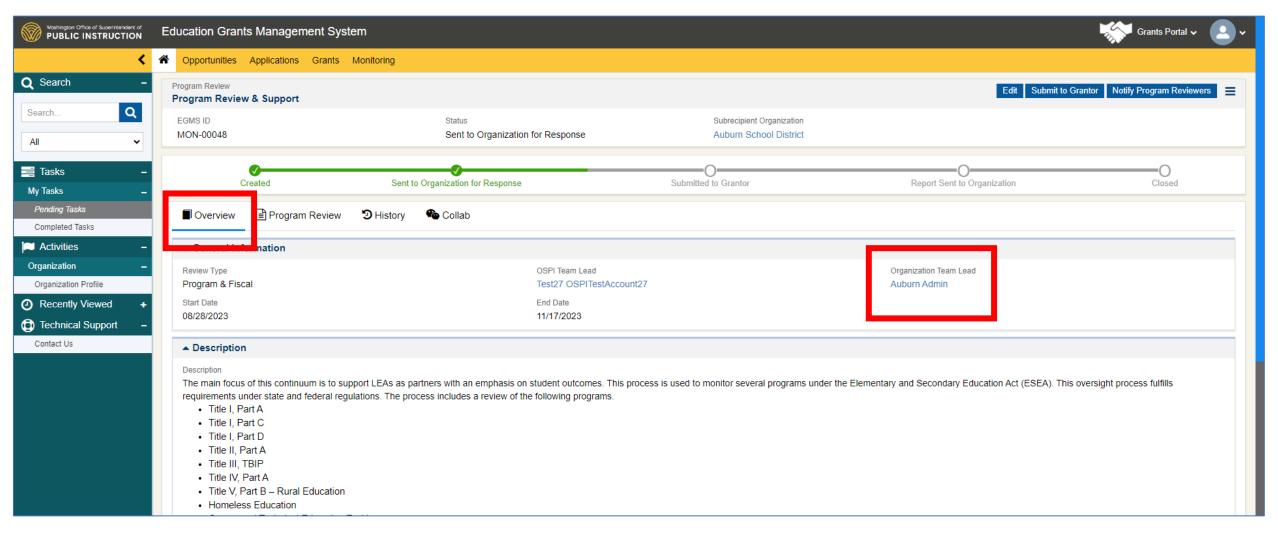


# Subrecipient access to Program Reviews



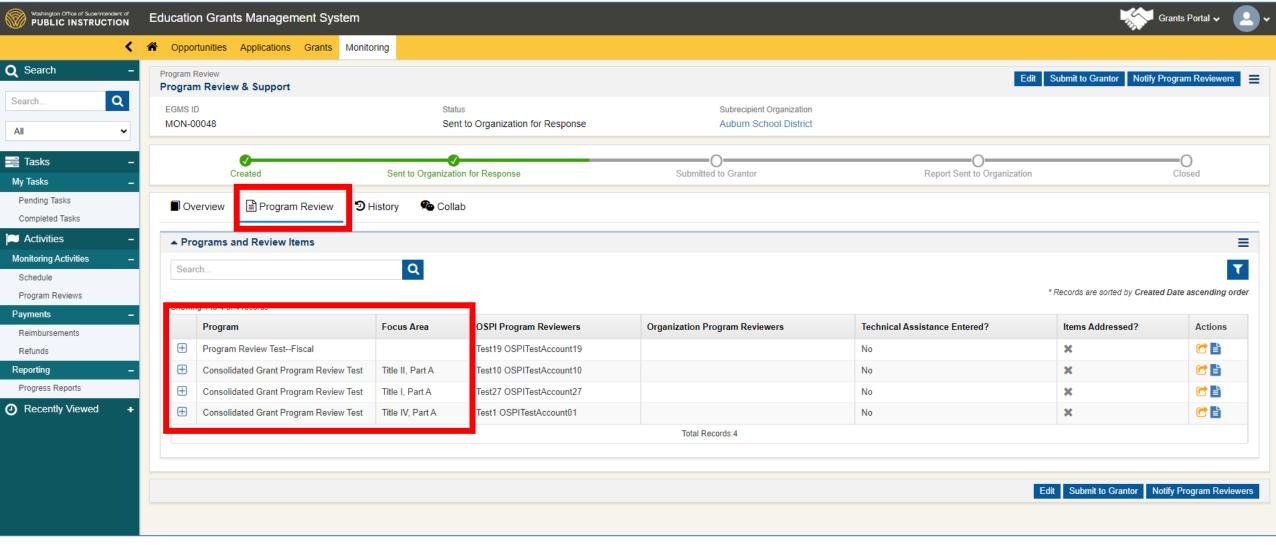
- ☐ The Subrecipient Organization can see an additional Monitoring task was assigned on the dashboard.
- ☐ In the Pending Tasks page, the Subrecipient can see the Monitoring Task on the "Assigned to Me" section.
- ☐ The Subrecipient can click on the green triangle (action button) to open the Review or access it through the Monitoring tab.

### Overview Tab



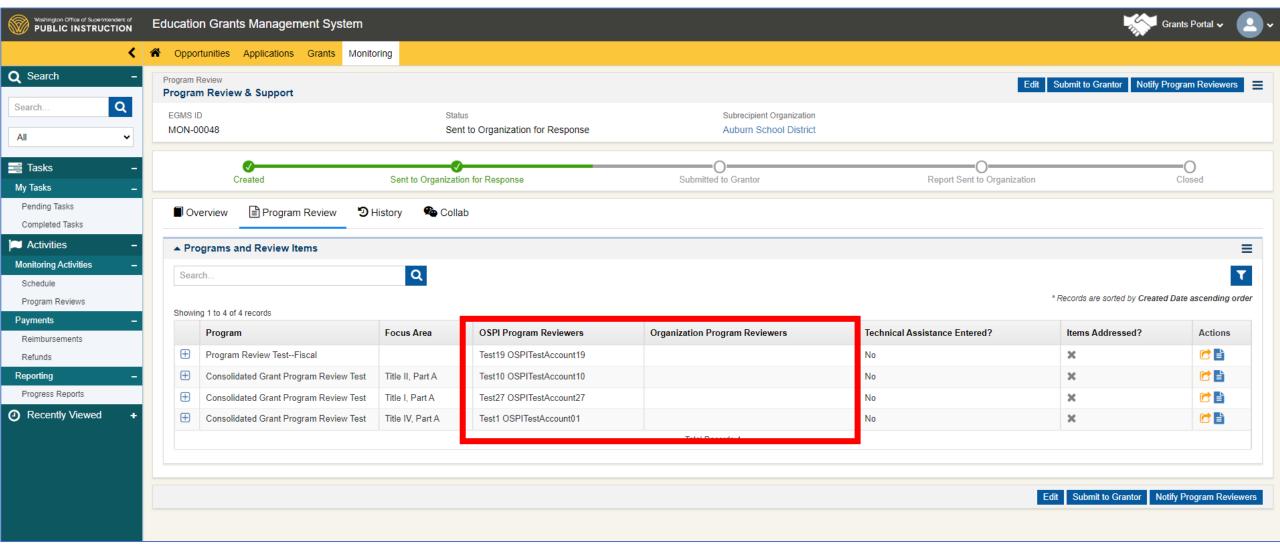
- ☐ When the Program Review is opened the first time, the Overview tab is displayed.
- ☐ This tab has general information about your Review.
- ☐ No actions needed on this tab.

# Program Review Tab



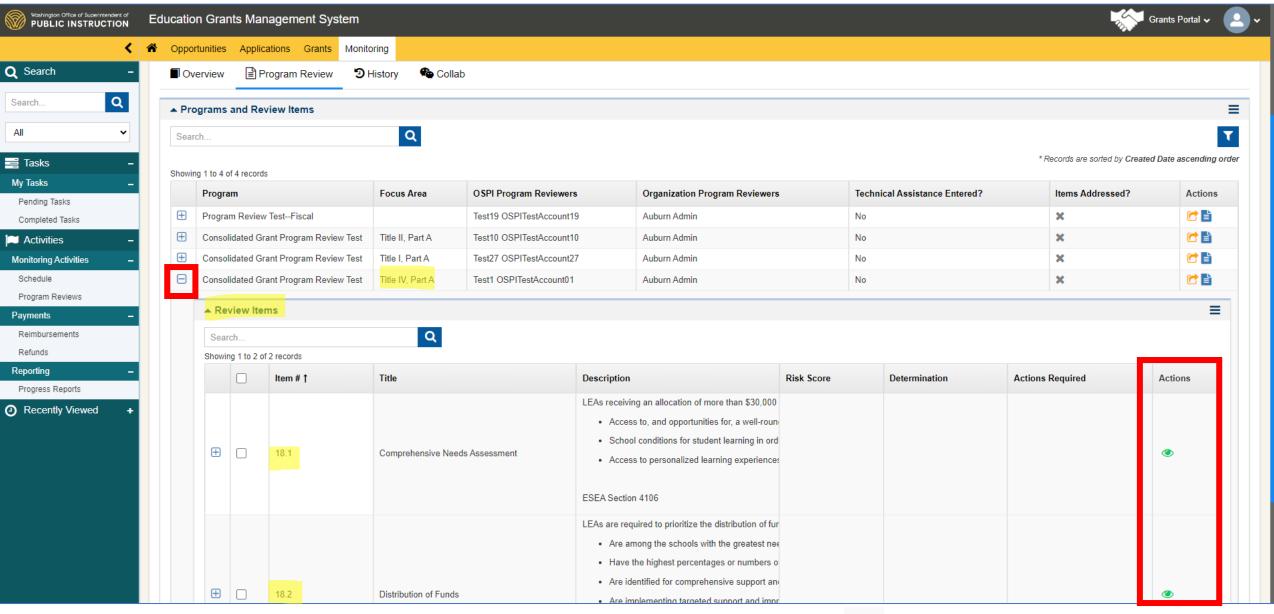
- ☐ This tab includes all the Program Checklists and is where you will respond to the checklist items.
- ☐ Each row of the table pertains to a single Program. **Program** and **Focus Area** columns contain the name of the Program.
- ☐ Use the ☐ to expand each row to see the checklist items.

# Program Review Tab



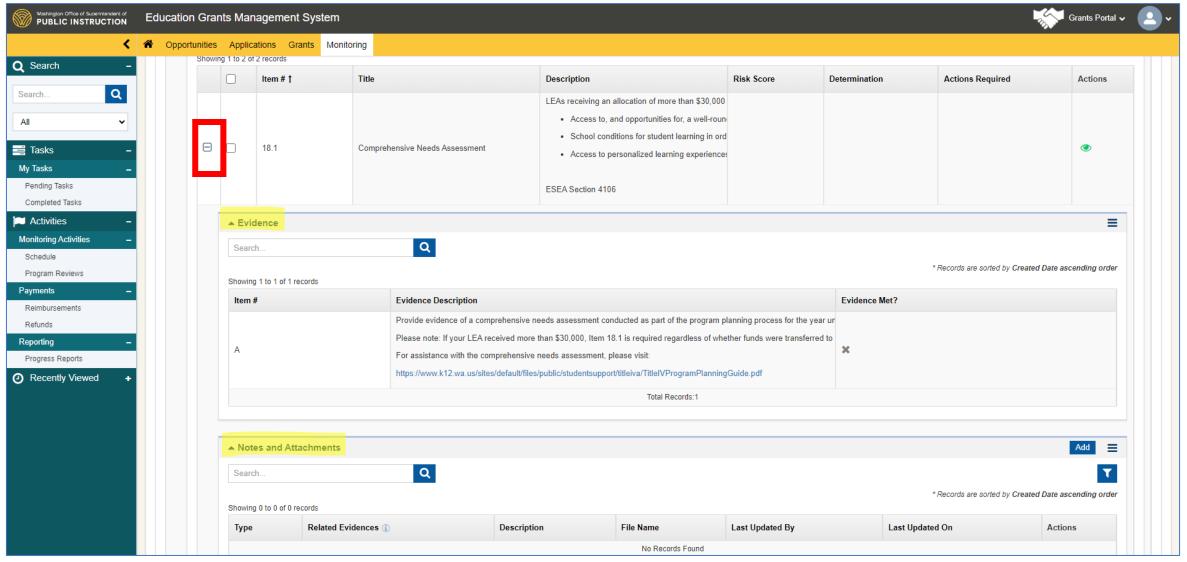
- ☐ The **OSPI Program Reviewers** column contains the OSPI staff who will Review that Program.
- ☐ The **Organization Program Reviewers** are those the Organization Team Lead assigns to each Program. *Only the Team Lead can assign staff to the Programs*.

# Responding to Checklist Items



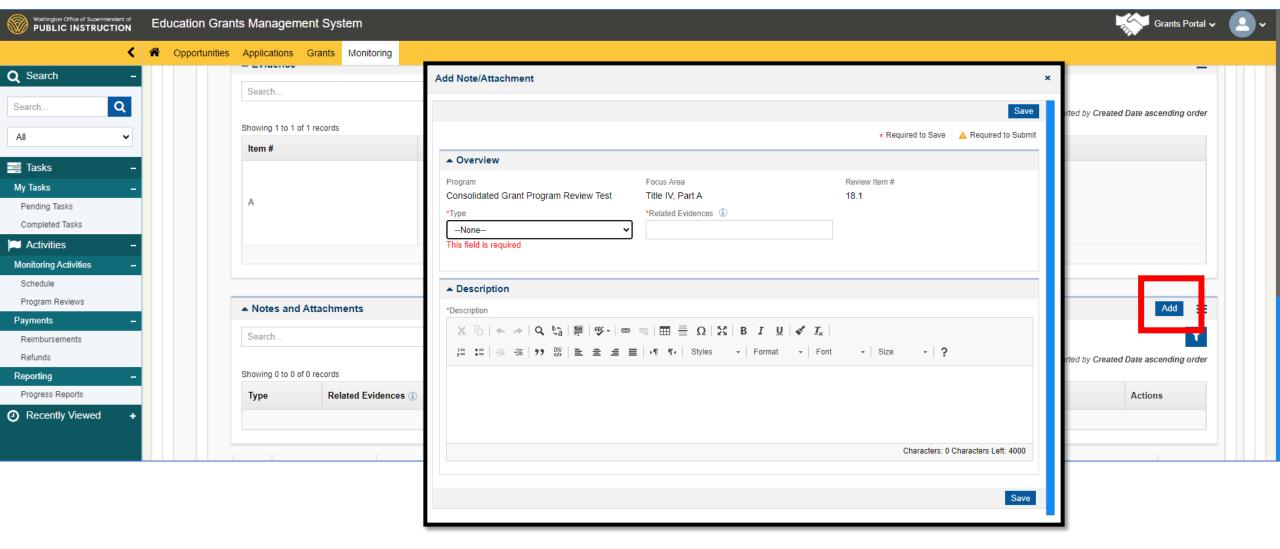
☐ Use the ☐ to expand each row to see the checklist (or Review) items. Click on the ② to read the **Description** if needed.

# Responding to Checklist Items (cont.)



- ☐ Use the ☐ to expand the Review Items and see the **Evidence** sub-items. Hover over the **Evidence Description** to read more.
- ☐ Use the **Notes and Attachments** section to upload documents, descriptions, and notes.

# Responding to Checklist Items (cont.)



- ☐ Click on **Add** to add a response to the Checklist Item with a Note or an Attachement.
- ☐ Window will pop-up with the fields to complete.

## Additional Information

- The EGMS Administrator in your LEA or organization can assist with assigning EGMS licenses. If the LEA or organization reaches their maximum license amount, the EGMS Administrator can reach out to <a href="mailto:Amy.Harris@k12.wa.us">Amy.Harris@k12.wa.us</a> and Cc <a href="mailto:EGMS.Support@k12.wa.us">EGMS.Support@k12.wa.us</a> to request additional licenses.
- Once you gain access to the Program Review, if you have questions or concerns with EGMS Program Review, reach out to the OSPI Team Lead assigned to your Review.
- Coming Soon
  - Part 2: Responding to the Preliminary Report in EGMS
  - Part 3: Closing the Program Review and Follow-up





Program Review & Support Resources

# Resources Program Website + Resources | Guides

The search box is your friend

Familiarize yourself with the content

Check out the resources

Add the websites to your "favorites"



#### Title I, Part A

Closing Educational Achievement Gaps (Title I, Part A) |
 OSPI (www.k12.wa.us)

# Title I 1003 (OSSI) School Improvement

• <u>System and School Improvement | OSPI (www.k12.wa.us)</u>

Title I, Part C

• Migrant Education Program | OSPI (www.k12.wa.us)

Title III

 Multilingual Education Program | OSPI (www.k12.wa.us)

Title IV, Part A

 Student Support and Academic Enrichment (Title IV, Part A) | OSPI (www.k12.wa.us)

**Homeless** 

<u>Students Experiencing Homelessness | OSPI (www.k12.wa.us)</u>

Learning Assistance
Program

• <u>Learning Assistance Program (LAP) | OSPI (www.k12.wa.us)</u>

**Equitable Services** 

 Private School Participation in Federal Programs | OSPI (www.k12.wa.us)





## Contact

Jason Miller, Executive Director Elementary, Early Learning, and Federal Programs jason.miller@k12.wa.us 360-764-6079

**Dr. Yesenia Rodriguez**, Assistant Director Federal Programs
<a href="mailto:yesenia.rodriguez@k12.wa.us">yesenia.rodriguez@k12.wa.us</a>
509-840-9119

#### **Website Resource:**

Program Review & Support (Formerly CPR)

#### **Office Hours**

Every Wednesday from 2pm to 3pm <a href="https://us02web.zoom.us/j/84989544935">https://us02web.zoom.us/j/84989544935</a>















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k12.wa.us



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