

Risk Based Monitoring: On-Site Monitoring Report



1 VISIT DETAILS

Location	CLV Strong Start Academy 310 S 9 th St, Las Vegas, NV 89101
Financial Period or Fiscal Years/ School Years Covered	FY 2023, July 1, 2022 - June 30, 2023 SY 2022-2023
Date(s) and time(s) of Monitoring	February 01, 2023 <ul style="list-style-type: none">10:00 AM – 2:00PM
Objectives	<ul style="list-style-type: none">Review the capacity, performance, and compliance of a subrecipient charter schoolAddress high-risk and specific issues that need immediate attentionDetermine fidelity of program deliveryEnsure that any subaward of federal funds is used for authorized purposes; in compliance with federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved
Report Completed by	Kristina Cote & Lidia Sedano
Date of Report	02/13/2023

2 SCHOOL OVERVIEW

- Total number of students: 80
- Grade levels: K–2
- Grants with Active Subawards:
 - ARP ESSER Final 1/3
- Grants with Allocations (subaward pending):
 - Title IA

- Title IIA
 - Title III
 - Title IVA
 - IDEA-B Special Education
- Total Federal Funds Expended in Previous FY (FY22): N/A - New school
- Single Audit Required: No - New School
- Current risk level: High
- Prior risk level: None, New school 2022 – 2023
- Prior Corrective Action Plan (CAP): No

3 SCOPE OF REVIEW/METHODOLOGY

The following activities were completed during this monitoring visit:

- Scope of fiscal review:
 - Fiscal administrative requirements, including:
 - Compliant system of internal controls
 - Compliant system to determine allowability of costs
 - Compliant financial management and accounting system
 - Compliant procurement system
 - Compliant plan for audit resolution
 - Compliant system for inventory management
 - Compliant system for records retention
 - Appropriate use of funds (Monitored in conjunction with review of program implementation)
- Scope of Relief Funds review:
 - Appropriate use of funds (Monitored in conjunction with review of program implementation)
 - Cross-cutting fiscal administrative requirements (scope of review provided above)
- Scope of program review:
 - Special Education
 - IEP development, meeting and record maintenance process aligned to federal and state requirements
 - IEP(s) are fully implemented
 - Progress monitoring is regularly conducted in accordance with IEP, federal/state requirements and best practices

- Ongoing parent communication, participation, and engagement
- Special Education IEP/file review
- Title IA
 - Program development included needs assessment, community outreach (parents, teachers, school staff, students) and alignment to School Performance Plan: Road Map to Success (“SPP”)
 - Program implementation aligns to federal requirements and program plan
 - School has worked to ensure effective involvement of parents and the community to improve student academic achievement
 - School regularly collects data and monitors progress towards goals and intended outcomes
 - For CSI, TSI, TSI/ATSI schools, evidence that the school is making progress towards exiting the designation
- Pilot Areas
 - McKinney-Vento
 - Foster Care
 - ESSER

4 STATEMENT OF FINDINGS

The tables below identify areas of strength and areas of noncompliance that were identified during this monitoring visit. Areas of non-compliance are determined based on the school’s preparation of supporting documentation and presentation of information - these findings are not exhaustive, and deficiencies may exist that were not observed during the review. It is the responsibility of the school to engage in ongoing internal oversight of grants and grant management processes to ensure compliance with all federal and local statutes, regulations, and policy requirements.

- There are not material deficiencies found. A CAP is not required.

4.1 AREAS OF STRENGTH

Monitoring Area	Description
Fiscal	The school’s Executive Director, Office Manager, and EdTec fiscal staff are all dedicated to using funds to maximize academic outcomes for all CLV Strong Start Academy’s students. CLV Strong Start Academy’s Executive Director and EdTec fiscal staff indicated that they are actively working on developing and

	implementing business processes at the school campus for effective and compliant management of grants and stated they were willing to make the necessary policy and process modifications to ensure effective and compliant grant management practices are both compliant and strengthened. School staff and EdTec fiscal staff interviewed answered all questions posed.
Special Education – Program	The school has worked closely with Nancy Fitzgerald, Academica Nevada’s Executive Director of Special Education, to ensure compliance and updated information on IEPs. The documents are current and up to date.
Title IA – Program	The school consistently provides updates to teachers, staff, and parents on how the school is performing with MAP testing results and reports from iReady math and reading.
Pilot Areas	The school promptly completed the documents for monitoring of pilot areas prior to the visit.

4.2 AREAS OF NONCOMPLIANCE

Any areas of noncompliance will require a CAP. The table below describes the conditions found during this monitoring visit.

Monitoring Area	Issue Identified	Criteria Used	Corrective Action Required	Resources
Fiscal	<ul style="list-style-type: none"> No areas of noncompliance found 			Continued annual professional learning on Uniform Guidance topics based on industry best practices and federal regulations is recommended to strengthen subaward performance and compliance with federal regulations.
Special Education – Program	<ul style="list-style-type: none"> No areas of noncompliance found 			
Title IA – Program	<ul style="list-style-type: none"> No areas of noncompliance found 			

Pilot Areas - Program	<ul style="list-style-type: none"> No areas of noncompliance found 			
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5 ADDITIONAL INFORMATION/ATTACHMENTS

- Agenda for Site Visit
- Sign-In Sheet
- Fiscal
 - Monitoring Report Note:
 - CLV Strong Start Academy did not comply with the SPCSA's 8:00 am January 30, 2023, deadline for submitting required Policies and Procedures 48 hours prior to the onsite visit. The Records Retention and CLV Strong Start Academy's Fiscal Policies and Procedures school submissions were received by SPCSA monitoring staff on January 30, 2023 at 6:22 pm. A physical binder which included several required policies and procedures that were not previously submitted with the January 30th delinquent submissions were shared by the CLV Strong Start Academy's Executive Director during the onsite visit on February 1, 2023. The Executive Director forwarded a softcopy of each required fiscal policy via email, a follow-up action step requested during the visit debrief.
 - Recommended improvements include:

Fiscal- SPCSA recommends that the following enhancements be included in the written policies and procedures:

 - SPCSA fiscal monitoring staff recommends CLV Strong Start Academy's leadership and relevant operational staff to proactively and collaboratively work with EdTec fiscal staff to develop a continuous improvement process and plan for improving documented policies/procedures and implemented business processes. This recommendation for review is intended to further enhance subaward performance and compliance with federal regulations as outlined in the Uniform Guidance as the school grows.
 - Specifically, SPCSA recommends CLV Strong Start Academy to include further details to written policies and procedures to ensure that the 'how' and the 'who' and 'when' is thoroughly documented. Procedures are tied to policies. Making explicit this relationship along with how the procedure helps the school achieve its goals and strategic plans helps ensure both understanding and compliance. Specifics on the roles and responsibilities of applicable personnel performing grant-related fiscal administration should be described in more detail. Detailed step-by-step procedures should be written so that what needs to be done can be easily followed by all users, both tenured and new school personnel. This will help protect business processes and maintain internal

controls in the event of staff turnover or the expansion of grant programs. Additionally, detailed processes and procedures can be leveraged to develop documentation for internal training and evaluated annually by fiscal staff to identify and refine process gaps to help improve efficiency and effectiveness metrics.

- SPCSA recommends CLV Strong Start Academy and EdTec staff to consider prioritizing the development of detailed step-by-step procedures using the criteria of which tasks are conducted frequently and/or have high impact towards intended performance and/or compliance outcomes. It is highly recommended for CLV Strong Start Academy's Executive Director and relevant fiscal staff schedule time into the school calendar to identify, develop, and/or further refine the step-by step procedures on a quarterly basis and continue this process until all procedures for associated policies have been established. While the core elements of policies and procedures may stay the same, the details may change. As a rule, SPCSA recommends that the school reviews all policies and procedures annually once all step-by-step procedures have been established and documented.
- Lastly, SPCSA recommends that all school policies and procedures developed include a revision and adoption template to be tailored to the school's needs. This recommendation is designed to ensure all policies remain consistent with changes in federal regulations and the school environment.
- Special Education - Program
 - The file reviewed had the following items that needed correction at the time of visit:
 - IEP missing components:
 - PLAAFP: Effects Statement [NAC 388.284] -Remove "No effect statement needed" from the IEP. This needs to be a statement if they are on grade level, and then it needs to state that.
 - These items were corrected on February 10, 2023, by Miriam Benitez, Principal, and are not areas of non-compliance for this report.

6 NEXT STEPS

- After the preliminary On-site Monitoring Report has been reviewed and the school has identified inaccuracies or an official response (if applicable), your school will receive the final On-site Monitoring Report and a letter notifying you that onsite monitoring is complete.

Risk Based Monitoring: Agenda



CLV STRONG START

Please make sure that your school has a dedicated space where SPCSA can work during the on-site grant monitoring visit. Access to Wi-Fi is required. This workspace will be used for welcome & debrief meetings, for interviews and/or document review. Note that whenever possible, SPCSA staff will conduct interviews in the workspaces of key personnel. Observations are also necessary and will occur in applicable locations at the school site. Observations will likely occur in, but are not limited to, the following areas: classrooms, other instructional spaces, staff workspaces, and inventory storage areas.

Please refer to the forms provided during the agenda setting call for the areas that will be monitored. These forms will allow you to prepare for your visit because they contain all of the questions that will be asked onsite and describe the evidence that you will need to provide.

Monitoring Areas: Fiscal, Title I and SPED

AGENDA FOR: FEBRUARY 1, 2023, 10:00AM TO 2:00PM

Time Allocation	Monitoring Activity	
30 Minutes (10:00 – 10:30am)	Setup, Welcome, and Introductions	
30 Minutes (10:30 – 11:00am)	School Walkthrough	
30 Minutes (11:00 – 11:30am)	Grant Program Plan Review	
15 minutes (11:30 – 11:45am)	Break	
2 hours (11:45 – 1:45pm)	Fiscal Monitoring *Please note, that two rooms must be available during this time period if you are monitored for both Fiscal and Program areas so that fiscal monitoring and program monitoring can be conducted separately.	Program Monitoring *Please note, that two rooms must be available during this time period if you are monitored for both Fiscal and Program areas so that fiscal monitoring and program monitoring can be conducted separately.
15 minutes (1:45pm – 2:00pm)	Debrief	

Special Education file review for student, *SUID#: 100056, Student Initials: AC*

Risk Based Monitoring: Sign In Sheet



Location	CLV Strong Start 1617 Alta Dr, Las Vegas, NV 89106
Financial Period or Fiscal Years/School Years Covered	07/01/2023-06/30/2023
Date(s) and time(s) of Monitoring	02/01/2023 • 10:00am-2:00pm
Monitoring Areas	Fiscal, Title IA, SPED

Print Name	Position	Email Address	Signature
Miriam Benite	Executive Director	mbenitez@clvstrongstartes.org	Miriam Benite
Tino Mora	Learning Strategist	fmora@clvstrongstartes.org	Tino Mora
Lidia Sedeno	EPP - SPCSA	Lidia Sedeno @ spcsa.nv.gov	Lidia Sedeno
Kristina Cote	EPP - SPCSA	KristinaCote@spcsa.nv.gov	Kristina Cote
Marisol Piedra	Office Manager	MPiedra@clvstrongstartes.org	Marisol Piedra



302 S. 9th Street
Las Vegas, NV 89101
702.463.0222
clvstrongstartes.org

Miriam Benitez, Executive Director

Attention: Monitoring@SPCSA.nv.gov

Please know that the intent in this response is to provide feedback regarding the following section of the report:

5 Additional Information/Attachments

Monitoring Report Note:

▪ CLV Strong Start Academy did not comply with the SPCSA's 8:00 am January 30, 2023, deadline for submitting required Policies and Procedures 48 hours prior to the onsite visit. The Records Retention and CLV Strong Start Academy's Fiscal Policies and Procedures school submissions were received by SPCSA monitoring staff on January 30, 2023 at 6:22 pm. A physical binder which included several required policies and procedures that were not previously submitted with the January 30th delinquent submissions were shared by the CLV Strong Start Academy's Executive Director during the onsite visit on February 1, 2023. The Executive Director forwarded a softcopy of each required fiscal policy via email, a follow-up action step requested during the visit debrief.

During the January 18th onsite monitoring agenda setting call, it was noted that some items needed to be forwarded 48 hours prior to the onsite visit and that I would be receiving an email highlighting the required items:

NOTE: For Title I monitoring, it is REQUIRED that you provide written answers to the "Program Interview Questions" section of the form, that you will turn in to SPCSA staff 48 hours before your visit by email to monitoring@spcsa.nv.gov.

- NOTE: For Pilot monitoring, it is REQUIRED that you provide written answers to this form, that you will turn in to SPCSA staff 48 hours before your visit by email to monitoring@spcsa.nv.gov.
- NOTE: For Special Education monitoring, it is REQUIRED that you provide written answers to the "Program Questions" section of this form, that you will turn in to SPCSA staff 48 hours before your visit by email to monitoring@spcsa.nv.gov.

The fiscal policies and procedures were not listed on that email. However, on January 20th, I did receive a follow-up email asking for the school's current policies and procedures that cover key fiscal components (see below). While the email did ask to send the documents along with the previous request, it did not indicate anywhere that this was a required item to be submitted 48 hours prior to the site visit, like the items listed above.

Good morning-

I have one additional monitoring document return request on behalf of fiscal.

Can you also please attach and forward your school's current **policies and procedures** that cover key fiscal components and send them along with the other document requests below.

This will allow me the time to review them prior and efficiently target questions when we meet in person.

Thank you!

It would be extremely helpful if the same language was used in the second request as in the first. There is massive amounts of information to sift through in preparation for this visit and it is hard to keep track of everything. When I was preparing these items, I referenced all the materials and focused on the yellow highlighted items that explicitly stated that the items were due 48 hours before the visit. Also, there is no reference written anywhere to an 8:00 am deadline. Explicit and consistent wording would eliminate future misunderstandings.

Respectfully

Miriam Benitez