SCSC Monitoring Activities Handbook

State Charter Schools Commission of Georgia
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Introduction: The Purpose and Types of SCSC Monitoring

The State Charter Schools Commission of Georgia (SCSC) monitors and annually reviews and evaluates state charter schools' academic, financial, and operational performance to determine whether they meet the performance measures in their charter contracts and comply with applicable laws, rules, and regulations. (O.C.G.A. 20-2-2083 (b)(4), SCSC Rule 691-2-.03) SCSC monitoring is designed to promote high-quality charter schools by identifying compliance concerns and incentivizing remediation.

Operational monitoring determines whether a charter school is organizationally effective, compliant, and well-run. Operational monitoring activities are aligned with the performance indicators in Section III of the SCSC's Comprehensive Performance Framework (CPF).

Fiscal management and oversight monitoring activities seek to determine whether a charter school is fiscally viable and responsible.

This guide describes the SCSC's FY25 monitoring activities, which include:

- Operations Monitoring: Policy, Procedure, and Practice Review;
- Fiscal Management and Oversight Review;
- Health and Safety Facility Visits;
- Unannounced Facility Visits;
- Website Monitoring;
- Governing Board Monitoring; and,
- High-Risk Financial Monitoring.

As a reminder, the results of the SCSC's monitoring activities are only one of many data points the SCSC considers when calculating CPF scores. A compilation of data sources for each performance indicator is available in the appendix of the CPF.

An overview of the FY25 monitoring activities timeline is included herein as Appendix A.

What to Expect: Operations Monitoring- Policy, Procedure, and Practice Review

The SCSC will review school policies, procedures, and practices for compliance with the charter contract and applicable laws, rules, regulations, and policies. Documentation for the Policy, Procedure, and Practice review must be submitted through the SCSC Administrative Portal on or before 11:59 PM on October 1, 2024. Submissions must be in searchable PDF or Microsoft Word format. Documentation that is not submitted in a timely manner through the SCSC Administrative Portal will not be reviewed for compliance.

The SCSC will review submissions for compliance as long as they are submitted on or before the deadline. The policy, procedure, and practice review represents a "snapshot" of compliance. Schools will not be permitted to amend or supplement responses after submission. Further, the SCSC will not review new documents or information during the appeal window, discussed below, to determine compliance.

The SCSC Policy, Procedure, and Practice review is not a comprehensive evaluation of the requested documentation. Instead, SCSC staff will evaluate school policies, procedures, and practices for specific compliance elements. Complete compliance remains the responsibility of each state charter school.

As a charter authorizer, the SCSC holds schools accountable for compliance with the provisions of their charter contracts and applicable rules, laws, and regulations. The SCSC's operational monitoring activities are tailored to determine the overall operational health of state charter schools. State charter schools are responsible for ensuring their awareness of and compliance with all applicable legal, regulatory, and contractual obligations.

State charter schools assume sole responsibility for the accurate and timely data transmission to the SCSC. By signing the charter contract, state charter schools affirm their understanding that inaccurate or untimely data may adversely impact the school's academic, financial, and operational standing and that the SCSC does not guarantee an opportunity to correct errors.

An illustration of the review topics, documents, and information the SCSC will evaluate during the FY25 Policy, Procedure, and Practice review is included herein as Appendix B.

How to Prepare: Operations Policy, Procedure, and Practice Review

To prepare for the SCSC policy, procedure, and practice review, state charter schools are encouraged to:

1. **Review portal log-in information and watch the Monitoring Programs Walkthrough.**

All official SCSC policy, procedure, and practice review communications will occur through the SCSC Administrative Portal. Please ensure that all portal log-in and contact information is accurate. Communications will be sent to the registered e-mail account, not to the account(s), for staff authorized to collaborate on the submission.

To update the e-mail address associated with your Administrative Portal account, log in to the portal and update the account settings. Schools may wish to review the "How to Ensure Emails Are Received from Survey Monkey Apply" article for additional information and the SCSC Administrative Portal Guide Book.

To reset your password, select "Forgot your password?" at the bottom of the log-in page. A password reset email will be sent to the email address associated with the account.

Additionally, review the Monitoring Programs Walkthrough video, available here, before accessing the programs.

2. **Attend the Monitoring Webinar.**
The monitoring webinar will provide an overview of the monitoring process and allow attendees to ask questions. A recording of the webinar will be provided to schools.

3. **Review the Operational Compliance Section and Appendix of the CPF.**

The SCSC's operational monitoring activities are aligned with the performance indicators in Section III of the CPF. The policy, procedure, and practice review is organized consistently with CPF operational performance indicators. Familiarity with the operational performance indicators will ensure that the school understands the policies, procedures, and practices the SCSC considers when evaluating a school's performance under the CPF operational indicators and measures. Further, the CPF Appendix describes the data sources reviewed by SCSC staff to determine the school's performance under each indicator.

4. **Maintain a process for ensuring awareness and compliance with new and existing legal obligations.**

State charter schools are responsible for ensuring their awareness of and compliance with all applicable legal, regulatory, and contractual obligations. Schools are encouraged to review policies, procedures, and practices periodically but no less than annually. In addition, schools should have mechanisms to monitor newly enacted legislation, amendments to existing legislation, implementation guidance, and model policies disseminated by the SCSC, Georgia Department of Education (GaDOE), and the State Board of Education (SBOE).

In addition, state charter schools should liaise with GaDOE and SCSC staff, as appropriate, for guidance and technical assistance concerning state charter school obligations. State charter schools should also consult the monitoring resources page of the SCSC Administrative Portal: SCSC Monitoring Resources and the SCSC LEA Legal Obligations guidance document here.

5. **Review applicable legal and regulatory requirements for transparency.**

SCSC Rule 691-2-.03 (State Charter School Monitoring) and SBOE Rule 160-4-9-.06 (Charter Authorizers, Financing, Management, and Governance Training) require state charter schools to post certain information on their websites.

6. **Ensure timely document submissions are uploaded in searchable Adobe PDF or Microsoft Word format.**

As above, responsive information MUST BE SUBMITTED through the SCSC Administrative Portal on or before 11:59 PM October 1, 2024. Document submissions must be in a searchable PDF or Microsoft Word format.

Schools will have at least six weeks to upload documents and provide information in the SCSC Administrative Portal. Ensuring that policies, procedures, and practices are readily accessible to relevant staff and in the format required for submission will streamline and expedite the school's policy, procedure, and practice review submission. Searchable PDF documents make the documents accessible to users of assistive technology while also making it possible to search for text within the document.

7. **Confirm the accuracy of your submission. Press "SUBMIT"**

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To submit the school's responses, select the green "SUBMIT" button at the end of the application. SCSC staff will evaluate the school's data in response to each question or prompt.

As a reminder, the policy, procedure, and practice review represent a "snapshot" of compliance. Schools will not be permitted to amend or supplement responses after submission. Further, the SCSC will not review new documents or information submitted during the appeal window to determine compliance.

State charter schools are solely responsible for timely and accurately submitting data to the SCSC. Inaccurate or untimely data may adversely impact the school's operational standing. The SCSC does not guarantee an opportunity to correct submissions.

What to Expect: Fiscal Management and Oversight Review

The SCSC will review the state charter school's financial policies and procedures and financial reports and transactions for compliance with all applicable laws, rules, regulations, and provisions of the charter contract relating to financial management and oversight expectations. The fiscal management and oversight review is one data source that is considered in calculating a state charter school's score on Section II of the CPF: Financial Performance. Consistent with the CPF, the fiscal management and oversight review is separate from the operational monitoring policy, procedure, and practice review. As a reminder, the results of the SCSC's monitoring activities are only one of many data points the SCSC considers when calculating CPF scores. A compilation of data sources for each performance indicator is available in the appendix of the CPF.

Documentation for the fiscal management and oversight review must be submitted through the SCSC Administrative Portal on or before 11:59 PM October 1, 2024. Submissions must be in searchable PDF or Microsoft Word format. Documentation that is not timely submitted through the SCSC Administrative Portal will not be reviewed for compliance.

The SCSC will review submissions for compliance as submitted on or before the deadline. The fiscal management and oversight review represents a "snapshot" of compliance. Schools will not be permitted to amend or supplement responses after submission. Further, the SCSC will not review new documents or information submitted during the appeal window to determine compliance.

How to Prepare: Fiscal Management and Oversight Review

To prepare for the SCSC fiscal management and oversight review, state charter schools are encouraged to:

> **1.   Review CPF, Section II, Indicator 2: Fiscal Management and Oversight and Appendix of the CPF.**

The SCSC's fiscal management and oversight monitoring activities are aligned with the performance indicators in Section II of the CPF. The fiscal management and oversight review is organized consistently with CPF financial performance indicators. Familiarity with the financial performance indicators will ensure that the school understands the policies, procedures, and

practices the SCSC considers when evaluating a school's performance under the CPF financial performance indicators and measures. Further, the CPF Appendix describes the data sources reviewed by SCSC staff to determine the school's performance under the fiscal management indicator.

2.   Follow the preparation steps outlined above in the policy, procedure, and practice review section.

3.   Review the Local Units of Administration (LUA) Manual.

State charter schools are public-sector entities that are considered Local Education Agencies (LEAs) or school districts. The LUA manual must be reviewed since it guides strong financial management (LUAS Manual, gadoe.org) to all LEAs. Schools must use the LUA manual when developing financial policies and procedures, which the school's Governing Board must approve.

4.   Ensure website financial transparency compliance.

State charter schools must make a summary of the annual operating budget proposed and adopted by the governing board available on a publicly available area of their websites, as required by O.C.G.A. § 20-2-167.1. Maintaining a robust website promotes transparency, engages stakeholders, and alleviates administrative inefficiencies within the monitoring process.

5.   Annually review and update financial policies and procedures.

State charter schools must develop their own financial policies and procedures approved by their Governing Board. Schools should review their financial policies and procedures annually and ensure staff are trained on them and any revisions or updates to ensure practices align with the school's procedures. Schools should also implement practices that ensure relevant staff know and follow established financial policies and procedures.

6.   Maintain appropriate drawdown procedures.

State Charter Schools that participate in federal programs with the Georgia Department of Education (GaDOE) will draw down federal funds on a reimbursement basis for all allowable expenditures incurred in their respective participating federal program(s). To receive federal funds, State Charter Schools are required to submit budgets for approval to GaDOE. When budgets are approved, schools must make sure they are completing drawdowns of available funds with the GaDOE on a regular basis i.e., monthly to meet the school's expenditures. LEAs should ensure compliance with all applicable drawdown procedures per the Uniform Administrative Requirements, 2 CFR Part 200 and GaDOE federal programs drawdown procedures.

To complete drawdown requests for funds, state charter schools must have access to the Financial Review Data Collection application. This application allows the Financial Review Coordinators and users to review and transmit financial and budget data to the GaDOE. To access all data collection information and to transmit data, you must have access to the GaDOE portal. Financial Review (gadoe.org)

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What to Expect: Health and Safety Facility Visits

State charter schools meeting the following criteria will receive health and safety facility visits during the FY25 Monitoring Cycle:

(a) State charter schools entering their first year of operations
(b) State charter schools entering the final year of a charter term and did not receive a health and safety visit during FY24
(c) State charter schools that have changed or added facilities within the last 12 months

Onsite health and safety visits may occur if health and safety concerns were observed during prior onsite visits or if the SCSC determines, in its sole discretion, that circumstances warrant a health and safety visit.

In addition to observing the school's climate and environment for health and safety, SCSC staff may ask to observe classes or visit specific areas of the school. The health and safety facility visit will be conducted in a manner that does not disrupt instruction or other school activities. The school leader or designee and other individuals familiar with the school's day-to-day operations should be available to respond to questions. Board members are not expected to be available.

The SCSC will send notices to qualifying schools of their scheduled health and safety visit date and time no later than August 19, 2024. Health and safety visits will generally occur during the months of September and October 2024.

An example health and safety visit checklist is included herein as Appendix C.

How to Prepare: Health and Safety Facility Visits

1. **Understand your eligibility status.**

Because not all state charter schools will receive a health and safety facility visit during the FY25 monitoring cycle, ensure that relevant staff and school leaders know whether they meet the eligibility criteria. If the school is unsure whether it is eligible for a health and safety facility visit, please contact SCSC staff for confirmation.

2. **Ensure that school staff are competent and prepared to lead a tour of the school and to respond to health and safety-related questions.**

Because each state charter school facility differs, ensure that staff assigned to represent the school during the health and safety visit are knowledgeable about the building layout and can speak accurately about security processes and procedures for accessing the building, protecting student records and medical information, and fire or emergency evacuation routes.

3. **Confirm the date and time of the facility visit and notify SCSC staff if the scheduled site visit is likely to disrupt instruction or other school activities.**

To the extent possible, health and safety facility visits will be scheduled in a manner that is the least disruptive to instruction and other school activities. Because instructional methods and testing schedules may differ by school, it is the school's responsibility to notify SCSC staff if the scheduled facility visit will disrupt school activities. Schools receiving a health and safety visit will have one week to request schedule changes. Changes shall be requested by Monday, August 26, 2024. SCSC staff will use their best efforts to accommodate schedule change requests. However, we cannot guarantee accommodations.

SCSC Monitoring Results

Using information from the operations policy, procedure, practice review, the fiscal management and oversight review, and health and safety facility visits, SCSC staff will identify compliance concerns and areas requiring remediation. Each school will receive written results that identify areas of concern or non-compliance. The results of each of the aforementioned SCSC monitoring activities may be distributed separately. Monitoring results will identify two types of compliance concerns:

- **Findings** are violations of statutory, regulatory, or contractual requirements that result in the loss of points on the Comprehensive Performance Framework (CPF) and require corrective action.

- **Adverse Practices** are deficiencies that may impact but do not violate statutory, regulatory, or contractual requirements. Adverse practices do not require corrective action or result in the loss of CPF points but must be reviewed to ensure alignment with applicable requirements.

If SCSC monitoring results do not indicate a "finding" or "adverse practice," then the SCSC did not identify compliance concerns within the scope of its review. As a reminder, SCSC staff evaluates school policies, procedures, practices, and facilities for specific components of compliance; the SCSC does not perform a comprehensive evaluation of compliance. Complete compliance remains the responsibility of each state charter school.

Finally, monitoring results may indicate that a specific policy, procedure, or practice was not scored. An unscored measure within an indicator means that the results of the SCSC's review will not affect the school's monitoring results.

If a school believes that the SCSC made an error in issuing the school's monitoring results, the school must dispute the school's monitoring letter by submitting an appeal within seven days of receiving the monitoring results. The SCSC will only accept appeals submitted through the SCSC Administrative Portal. Disputes received after this timeframe or those not transmitted through the SCSC Administrative Portal will not be reviewed or considered.

Corrective Action Plans

Schools must submit a Corrective Action Plan (CAP) in response to any *finding(s)* identified in the SCSC monitoring results. The SCSC will not review adverse practice scores for compliance. A CAP is a written plan that describes the steps a school will take to remediate a finding. A CAP should be detailed enough to provide a reasonable understanding of how the school plans to

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remediate the issue and when remediation will be complete. The contents of the CAP and the methods by which the school chooses to remedy noncompliance are within the discretion of the governing board. The SCSC will respect the school's autonomy in devising and implementing its CAP, but it will also hold the governing board accountable for full compliance with applicable laws. The SCSC will not review adverse practice scores for compliance.

CAPs are due no later than six (6) weeks after monitoring results are issued. Schools are not required to submit CAPs in response to adverse practice scores or in areas the SCSC did not score for compliance.

Where appropriate, based on the CPF scoring guidelines, the SCSC may award partial CPF points on specific operational and fiscal management CPF measures. To be considered for an award of partial CPF points, a school must develop and timely submit a CAP and evidence of remediation for the findings identified in the SCSC's monitoring results. Evidence of remediation must be sufficient to demonstrate that the school has regained compliance in the area that received a finding.

All schools that receive findings in their SCSC monitoring results must submit a CAP. However, only schools seeking partial CPF points must submit evidence of remediation. The SCSC will not review CAP submissions that are not submitted by the applicable deadline and through the SCSC Administrative Portal.

CPF Calculations

Please remember that SCSC monitoring activities are one of many data sources that comprise the school's operational and financial performance on the CPF. Therefore, even if SCSC monitoring activities do not result in a finding or are otherwise not reviewed for calculating the CPF in a particular indicator, results from other data points may result in CPF point deductions in the same category. Schools are required to contact the external source to appeal any findings. The SCSC will only overturn findings from external sources if the SCSC receives confirmation from the external source that the finding has been overturned. Additionally, the SCSC will not award partial CPF points for the remediation of findings based on external data. The availability of partial CPF points is limited to the remediation of qualifying SCSC findings only.

To ensure that you understand your SCSC annual monitoring results in the context of the overall CPF score, please thoroughly review the CPF and its Appendix.

In some cases, appropriately remediating a finding identified in SCSC monitoring results does not result in an award of partial CPF points. This can occur in several circumstances, including but not limited to the following:

A. The school remediates a finding issued in an operational performance measure that does not permit an award of partial CPF points.

Findings in operational performance measures that do not offer an "approaches standard" on the CPF are not eligible for partial CPF points. Those measures not permitting an award of partial CPF points include the following: Measure 2c, Governance Training; Measure 2e, Budget Approved in Accordance with State Law; and Measure 6b, Continuing Obligations.

B. The school remediates a finding in an operational performance measure that provides an opportunity for remediation, but the finding relates to an obligation requiring absolute performance.

For example, the SCSC issued a finding for TBCS in CPF measure 2b because the school failed to timely respond to an Open Records Act request. TBCS timely submitted a CAP and documentation of remediation through the SCSC Administrative Portal. SCSC staff reviewed the school's CAP submission and determined that TBCS remediated the finding by providing Open Records Act training to applicable school staff.

Measure 2b permits an award of all, partial, or none of the available points based on the following scoring criteria:

- <u>Meets Standard</u> (all points): The school complied with all applicable laws, rules, regulations, provisions of its charter contract, and policies relating to the Georgia Open Meetings Act and Open Records Act requirements.

- <u>Approaches Standard</u> (partial points): The school failed to comply with all applicable laws, rules, regulations, provisions of its charter contract, or its policies relating to the Georgia Open Meetings Act and Open Records Act requirements during its SCSC onsite or desk monitoring visit, but the school adequately remedied its finding(s) and regained compliance.

- <u>Does Not Meet Standard</u> (no points): The school failed to comply with all applicable laws, rules, regulations, provisions of its charter contract, or its policies relating to the Georgia Open Meetings Act and Open Records Act requirements.

TBCS is ineligible to receive a Meets Standard score because the SCSC's Policy, Procedure, and Practice review showed that the school did not comply with "all" applicable laws, rules, and regulations and provisions of the charter contract relevant to measure 2b.

TBCS is also ineligible for an "Approaches Standard." To receive an "Approaches Standard" score in measure 2b, the SCSC must conclude that although the school failed to comply with all relevant laws, rules, regulations, and provisions of the charter contract, TBCS adequately remedied all findings and regained compliance. Because the school was past the time period to timely issue a response to the Open Records Act request, the school could not <u>regain compliance</u> as required for an award of partial CPF points.

Therefore, TBCS received a score of "Does Not Meet Standard."

C. The SCSC issues two or more findings in a single operational performance measure, but the school fails to timely produce a CAP and sufficient evidence of remediation to establish regained compliance for each finding.

For example, the SCSC identified two findings for TBCS in CPF measure 2d. TBCS timely submitted a CAP for each of the findings. However, SCSC staff determined that TBCS only presented sufficient evidence of remediation for one of the two findings.

Measure 2d permits an award of all, partial, or none of the available points based on the following scoring criteria:

- Meets Standard (all points): The school complied with all applicable laws, rules, regulations, provisions of its charter contract, or its policies relating to operating transparently and effectively communicating with stakeholders . . .

- Approaches Standard (partial points): The school failed to comply with all applicable laws, rules, regulations, provisions of its charter contract, or its policies relating to operating transparently and effectively communicating with stakeholders during its SCSC onsite or desk monitoring visit, but the school adequately remedied its finding(s) and regained compliance.

- Does Not Meet Standard (no points): The school failed to comply with *all* applicable laws, rules, regulations, provisions of its charter contract, or its policies relating to operating transparently and effectively communicating with stakeholders.

TBCS is ineligible to receive a Meets Standard score because the school did not comply with "all" applicable laws, rules, and regulations and provisions of the charter contract relevant to measure 2d.

TBCS is also ineligible for an "Approaches Standard." To receive an "Approaches Standard" score in measure 2d, the SCSC must conclude that although the school failed to comply with all relevant laws, rules, regulations, and provisions of the charter contract, TBCS adequately remedied all findings and regained compliance.

TBCS' CAP documentation showed that it regained compliance concerning one finding in measure 2d. However, it failed to regain compliance for the second finding. Because one finding remained outstanding, the SCSC could not conclude that the school regained compliance concerning all applicable laws, rules, and regulations. Thus, TBCS received a CPF score of "Does Not Meet Standard."

B. **The SCSC issues a finding in an operational performance measure. Further non-compliance with the same operational performance measure is identified through a review of external data.**

For example, during its Fiscal Management and Oversight review, the SCSC identified a finding in financial performance measure 2b for TBCS. TBCS timely submitted a CAP in response to the SCSC finding, and SCSC staff determined that TBCS submitted sufficient evidence of remediation to regain compliance.

In accordance with the CPF Appendix, the data sources for financial performance measure 2b include:

- SCSC Annual Enrollment Projection Form
- GaDOE: Data Collections, Student Enrollment by Grade Level
- GaDOE: Charter School Annual Report, SEA Program Monitoring, Financial Reports
- SCSC: Monitoring Activities, Complaint Investigations
- Other: Reports of Noncompliance from a State or Federal Agency, Independent Audit Report

The SCSC's review of TBCS' "Independent Audit Report" showed further non-compliance in financial performance measure 2b. TBCS contacted its auditor to dispute the finding. The auditor determined that the audit results were appropriate based on the school's documentation and, thus, final.

Measure 2b permits an award of all, partial, or none of the available points based on the following scoring criteria:

- <u>Meets Standard</u> (all points): The school complied with all applicable laws, rules, regulations, and provisions of the charter contract relating to proper internal controls, expenditures, inventory, drawdowns, and cost principles when expending federal funds, including but not limited to:

    o Proper segregation of duties;
    o Source documentation for expenditures paid with federal funds;
    o Complete and on-time submission of program budgets (Title I, IDEA, and grant budgets); and
    o Maintaining inventory controls and documentation in accordance with federal regulations for items purchased with federal funds.

- <u>Approaches Standard</u> (partial points): The school failed to comply with all applicable laws, rules, regulations, and provisions of the charter contract relating to proper internal controls, expenditures, inventory, drawdowns, and cost principles when expending federal funds during its SCSC onsite or desk monitoring visit, but the school adequately remedied its finding(s) and regained compliance.

- <u>Does Not Meet Standard</u> (no points): The school failed to comply with all applicable laws, rules, regulations, and provisions of the charter contract relating to proper internal controls, expenditures, inventory, drawdowns, and cost principles when expending federal funds.

TBCS is ineligible to receive a Meets Standard score because the SCSC's Fiscal Management and Oversight review showed that the school did not comply with "all" applicable laws, rules, and regulations and provisions of the charter contract relevant to financial performance measure 2b.

TBCS is also ineligible for an "Approaches Standard." To receive an "Approaches Standard" score in measure 2b, the SCSC must conclude that although the school failed to comply with all relevant laws, rules, regulations, and provisions of the charter contract, TBCS adequately remedied all findings and regained compliance. The school's appeal of its Independent Audit Report finding did not result in reversing the finding, and there was no opportunity for the school to demonstrate that it regained compliance.

Because one finding remained outstanding, the SCSC could not conclude that the school regained compliance with all applicable laws, rules, and regulations. Thus, TBCS received a CPF score of "Does Not Meet Standard."

Unannounced Facility Visits

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The SCSC may conduct unannounced facility visits to monitor compliance concerns. Unannounced monitoring visits will not require the presence of a school administrator. They will consist of the SCSC observing the facility, assessing health and safety indicators, and other conditions relevant to school operations.

School Website Monitoring

Throughout the 2024-2025 school year, the SCSC will monitor school websites for compliance with SCSC Rule 691-2-.03 (State Charter School Monitoring) and SBOE Rule 160-4-9-.06 (Charter Authorizers, Financing, Management, and Governance Training), which, in part, require state charter schools to make specific information readily available on their websites. Non-compliance may result in the loss of CPF points for the corresponding measure: CPF Section III, Indicator 2, Measure 2b- Open Governance.

Governing Board Monitoring

The SCSC may contract with governing board monitors to attend some or all of a school's governing board meetings. SCSC governing board monitors are generally not SCSC staff members. The SCSC governing board monitors are trained to assess a governing board's compliance with minimum legal requirements (such as Open Meetings laws) and observe general governance practices. If the SCSC governing board monitor observes and reports legal violations, the school may lose points on the corresponding operational CPF measure: CPF Section III, Indicator 2, Measure 2b- Open Governance..

High-Risk Financial Monitoring

Schools may be required to complete financial review monitoring if the school meets one or more of the following categories:

- In the first year of operations;
- Scores "Does Not Meet Standards" on the financial section of the CPF;
- Significant financial findings from the SCSC or GADOE Financial Review Office;
- Placed on Probationary Status by the SCSC;
- Unrestricted days cash of less than 15 days or has a negative cash balance or;
- Events at the school warn that its ability to manage funds may be compromised.

Based on the severity of the deficiencies identified, schools may be monitored at other intervals as determined by SCSC staff.

Schools required to participate in high-risk financial monitoring will be notified by the SCSC. On a quarterly schedule schools will be required to complete an SCSC-provided financial template and submit other requested documents such as bank statements.

Conclusion

The SCSC makes every effort to ensure monitoring is fair and thorough. If you have any questions regarding operations monitoring activities, please contact Tiffany Leach, Sr. Associate

General Counsel, at tiffany.leach@scsc.georgia.gov; for financial monitoring activities, please contact Carmen Freemire Sr. Director of Finance, at carmen.freemire@scsc.georgia.gov . Health and Safety Facility visit inquires can be directed to Robert Watts, Facility & Assets Manager, at Robert.watts@scsc.georgia.gov.

Appendix A - FY25 Monitoring Timeline

FY25 Operational Monitoring Timeline	
August 19, 2024	Monitoring Webinar at 1:30 p.m. Notice of Health & Safety Facility Visits
August 19, 2024	The SCSC will notify applicable schools of the date and time of the health and safety facility visit.
August 20, 2024	Monitoring application in SCSC Administrative Portal opens.
October 1, 2024	Deadline for schools to submit monitoring documentation to the SCSC Administrative Portal.
September 9-October 31, 2024	Onsite health and safety facility visits window.
January 31, 2025*	SCSC will issue monitoring results for the operations policy, procedure, and practice review, fiscal management and oversight review, and the onsite health and safety facility visits.
1 week from receipt of monitoring results	Appeal submissions due.
6 weeks from receipt of monitoring results	Corrective Action Plans (CAP) submissions due.

* The SCSC may send monitoring results before this date.

Appendix B - Sample Fiscal Management and Oversight Review Documents*

CPF Section II	Illustrative Review Topics	Illustrative Documents
Fiscal Management and Oversight	- Financial procedures for purchases made with federal funds - Federal inventory management system compliance - LUA manual compliance, including but not limited to the existence of (and compliance with) purchasing thresholds; and construction contract awards - Federal procurement policies and procedures including standards of conduct	- -Financial Policies and Procedures - -Inventory records for property purchased with federal funds - -Inventory Policy and Procedures - -Journal entry reporting local five mill share - -Purchasing thresholds policy - -Documentation supporting bidding and awarding of any construction contract over $100,000.

Sample Policy, Procedure, and Practice Review Documents*

Indicator	Illustrative Review Topics	Illustrative Documents
1. Educational Program Compliance	- Implementation of essential and innovative features - Progress toward meeting mission-specific goals - Academic assessments and benchmarking - State education program requirements, such as EIP implementation, graduation requirements, and accreditation	- Early Intervention Program procedures and parental notice of identification for EIP. - Accreditation status for schools with high school graduation classes
2. Governance, Ethics, & Transparency	- Georgia Open Meetings and Records Act compliance - Annual operating budget approval	- Governing board bylaws - Governing board meeting calendars - Conflict of interest policy - Board Executive Session Affidavit - Budget hearing advertisements - Budget hearing meeting agendas - Budget hearing meeting minutes
3. Obligations to Students	- Student Code of Conduct - Parents' Bill of Rights	- Admissions application (pre-lottery)

		- Complaint resolution policy to address complaints alleging violations of the Protect Students First Act - Title IX of the Education Amendments notices and grievance procedures - Notices of Non-Discrimination - Section 504 of the Rehabilitation Act of 1973 notices and grievance procedures - Procedures for serving students with disabilities under Section 504 and the Individuals with Disabilities Education Act (IDEA) - Admissions procedures - Enrollment procedures - Policies and procedures for serving homeless students. - Processes and procedures for serving English Learners	- Enrollment documents, including home language survey - Student and Family Handbook - McKinney-Vento policy - Homeless Liaison training documentation - Title IX policy - Procedural Safeguards for parents of students with disabilities - Training and certification documentation for personnel providing EL services
4.	Employer Obligations	- Professional qualifications policies - Chief Financial Officer qualifications - Notice of non-discrimination to employees and staff - Notices required by the Family Medical Leave Act (FMLA) and the Fair Labor Standards Act (FLSA)	- Employee Handbook - FMLA Policy - Title IX Policy to staff
5.	School Environment	- Fire Drill reporting requirements - Adequate insurance coverage - School safety plan compliance - Training for staff and volunteers related to child abuse and neglect and Family Educational Rights and Privacy Act (FERPA) - School health nurse program policies - Infectious disease policies - Sudden cardiac arrest information sessions - Identification and reporting of child abuse - State-mandated process for reporting alleged sexually inappropriate behavior by personnel - Water safety education information - Implementation plan for seizure action plans - FERPA and Protection of Pupil Rights Amendment (PPRA) notices	- School safety drill schedule - Registration confirmation for the state emergency drill reporting system portal - Certificate of Insurance - Confirmation of safety plan submission to the local emergency management agency and law enforcement - Cardiac arrest symptoms and warning signs information sheet - Suicide prevention policy - Diabetes training certification
6.	Additional and Continuing Obligations	- Surety bond requirements - Stakeholder communications and complaints	- Surety bond - Process for receiving and responding to stakeholders'

		- Governing board conflict of interest requirements	communications and complaints - Signed conflict of interest forms by all governing board members

* The topics and documents in Appendix B are illustrative, not exhaustive, to assist state charter schools with monitoring preparation.

Appendix C - Health & Safety Visit Checklist

SCSC Initial Site Visit Checklist

School:	Address:	Date:

Campus Walk-Through / Key Systems

Overall Exterior	Yes	IP	No	Access Control	Yes	IP	No
The school's sign/marquee and the school's name are visible from the road				The security alarm is installed and operational			
The campus is clean and free of clutter and debris				The security alarm system is monitored off-site			
The campus is clear of potential safety hazards (e.g. storage tanks, sagging power lines, trees)				Signs direct Visitors to Sign-In at Main Entrance (First Responders)			
The campus has all required fencing				All doors are sturdy and well-functioning in good condition with appropriate locks.			
All fencing is in good condition and free of holes and sharp protrusions				When not in use, exterior doors are kept closed and locked from the outside			
Fencing gates include appropriate locking systems (e.g., electronic control, padlocks)				Exterior doors are equipped with push-bar exit devices flush to resist chaining			
The campus is adequately lit during day and night (including parking lots and building entrances)				Exit doors are free of locks, chains, or fasteners that prevent egress			
Walking surfaces are reasonably sloped and free from holes or other trip hazards				Areas that are restricted or off-limits are identified with signage and access control.			
Signage at entrances indicates the campus is drug-free, weapon-free, and smoke-free (O.C.G.A. § 16-13-32.4)				**Emergency Preparedness**			
All windows are intact and include blast film if required as a risk-hazard mitigation					Yes	IP	No
Any and all basement windows are protected from unauthorized entry and function as needed for egress				Evacuation Routes are posted in all Occupied Spaces (IFC 403.6.1.1)			
Any and all second-floor windows (or higher) are inaccessible or protected against entry				Evacuation Routes and shelter-in-place meeting locations are clearly marked at entrances and/or exits (IFC-403.9.1.1)			
All windows lock securely and function as needed for egress				The school Safety/Emergency Management Plan is available in the Office (O.C.G.A. § 20-2-1185)			
Parking				NOAA Weather Radio is present			
	Yes	IP	No	First-Aid Kits are stocked and accessible			
Accessible parking is located near the main entrance via an accessible path				Supply of Flashlights and Batteries are present			
Fire Lanes are marked with approved fire lane signs, painted curbing, and are clear of any obstruction				Shelter spaces are windowless/have available shutters to cover windows			
Parking is adequate for staff and stakeholders				**Life Safety**			
Parking lots have speed control devices (speed bumps, raised walkways, curved drives, or curb stops)					Yes	IP	No
Parking is monitored by a security system				Fire Alarm is monitored off-site			
Main Entrance				Fire Alarm features both audio and strobe functions (GA R&R 120-3-3-.04)			
	Yes	IP	No	Fire Alarm Pull Stations are easily accessible and secured with an alarm (IFC – 2703.12.2)			
The main entrances provide access or directions for access for individuals with disabilities				Fire Extinguishers are easily accessible (NFPA 13.6.1.2)			

Reception includes securable internal doors to receive visitors prior to meeting students or staff				All Exit Signs are operational and clearly lit (IBC 1013.5)			
Reception includes protective features (counter, desk, glass) to prevent unauthorized access				Emergency lighting is properly installed and operational (IFC-1031.10)			
The reception area remains unobstructed to entrance and egress				Fire Sprinklers Heads are present and in good condition			

Notes

Disclaimer: The inspection performed is only intended for monitoring purposes. Local and State building officials have jurisdiction over your school receiving a Certificate of Occupancy and other building code issue

Campus Walk-Through				Key Systems			
Overall Interior				**Traffic and Pedestrian Safety**			
	Yes	IP	No		Yes	IP	No
The ceiling is in good condition				Pedestrian areas are clearly designated and separated from vehicle traffic			
Floor coverings are properly installed and in good condition				Drop-off/pick-up is separated from bus lanes and other high-traffic areas			
Closets and Mechanical Rooms are locked and inaccessible to students O.C.G.A. § 20-2-1185				All traffic directions, including pick-up/drop-off lanes, are clearly identified			
Chemicals and other hazardous materials are locked and stored away from fire hazards. O.C.G.A. § 20-2-1185				Signs label the school as a school zone, drop-off zone, or no parking zone			
Electrical wiring is concealed, and power cords are in good condition				Street signage indicates a reduced speed limit and "slow" vehicles			
Electrical panel doors are locked (O.C.G.A. § 20-2-1185)				**Communication Systems**			
All hallways are free of obstruction					Yes	IP	No
Evacuation Routes are posted in all Occupied Spaces (IFC-403.9.1.1)				Internet access is present and appropriate for educational purposes			
Administrative office locations are clearly identified				Telephone system is present and operational			
All stairwells uniformly and adequately lit with functional exit signs as needed				Intercom. system (PA, Walkie-Talkie, etc.) is present and operational			
Water fountains are wheelchair-accessible (ADA 602.1)				**Record Systems**			
Water fountains are clean and operational				FERPA 20 U.S.C. § 1232g; 34 CFR Part 99	Yes	IP	No
First Aid or Clinic location is clearly identified				Education records are stored in locked cabinets secured from access			
All medical equipment and supplies are locked in an observable area				Confidential records are stored in a locked, fire-resistant cabinet			
Classrooms				**Kitchen**			
	Yes	IP	No		Yes	IP	No
Classroom Emergency Procedures are posted				Evacuation Routes are posted in all Occupied Spaces (IFC-403.9.1.1)			
Evacuation Routes are posted in all Occupied Spaces (IFC-403.9.1.1)				At least one "K-class" fire extinguisher is present. (NFPA 10 Sub. 5.5.5)			
Classroom Emergency Supplies (e.g., first aid kit, roster, signage) are present and accessible				Chairs, Tables, and Furniture are in good repair			
Egresses are accessible and unobstructed				All mechanical equipment is guarded and in good repair.			
Lighting is appropriate for learning				First Aid Signs and Handwashing Signs are present			

Restrooms	Yes	IP	No
Exposed water pipes (e.g., those underneath the sink) are insulated and protected with a cover (ADA 606.5)			
Restrooms are well-lit and easily supervised			
Measure grab bar heights 33" - 36" (ADA Section 609.4)			
Mirrors are unbroken and intact			
All stalls and stall doors are functional and in good repair			
All water fixtures are operational			
The restroom is well-maintained with no masking odors			
All doors to restrooms are only lockable from the outside and cannot be blocked from the inside			
All single-user bathrooms with locking doors are easily monitored and controlled by keys or passes			
Restrooms designated for adults (staff/visitors) are present and separate from student restrooms			

Playground	Yes	IP	No
Playground is fenced to restrict unauthorized access.			
All fencing is in good condition and free of holes and sharp protrusions			
Landscaping is pruned away from the playground area			
Play area is free of tripping hazards			
Ground cover is adequate to provide protection and ADA compliance ADA-Advisory 105.2.3 ASTM			

Notes

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*IP means that an item is In Progress
Citation Codes- IFC-International Fire Code, IBC-International Building Code, ADA- American with Disabilities Act, GA R&R- Georgia Rules and Regulations, ASTM-American Society for Testing and Materials, OCGA- Official Code of Georgia

Appendix D – FY 25 Monitoring Applications

The complete Operations Monitoring Application can be accessed here.

The complete Fiscal Monitoring Application can be accessed here.