

Wisconsin Charter Schools Program

On-site Monitoring Visit Guide

Program authorized by CFDA #84.282A – Title IV Part C of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015

Directions: Complete all fields highlighted in yellow and attach all documentation highlighted in green. Send this completed document along with all required attachments to charterschools@dpi.wi.gov at least five business days prior to your scheduled monitoring visit. Providing this information and documentation prior to the on-site visit will allow Department of Public Instruction (DPI) staff to review materials and compile any follow-up questions or concerns to be addressed during the visit. This will ensure the most efficient use of time during the on-site visit. Documentation that is not highlighted in green should be compiled and made available to DPI staff during the site visit.

School Name	
Authorizer	
Date of Site Visit	

OVERVIEW

Compliance is an integral part of the Wisconsin Charter School Program (WCSP). The Wisconsin DPI conducts on-site visits to monitor charter schools receiving WCSP grants.

The purpose of the site visit is to determine how well the subgrantee is meeting requirements and guidelines related to:

1. Program implementation (grant expenditures are aligned with the goals and objectives stated in the grant application),
2. Fiscal accountability,
3. Board founding, governance, policy and fiscal oversight,
4. Performance Objectives, and
5. Compliance with state and federal law.

Name of Charter School	
Charter School Contact	
Contact Phone	
Contact Email	
Current Award Type	
Current Budget Period	
Current Award Amount	
Site Visit Leader	
Site Visit Roster	<i>Provide a list of the individuals who will be attending the site visit. Please include name, position, and organization name of all persons attending (school, governing board, sponsor, management company, etc.).</i>

DOCUMENTATION CHECKLIST

Please assemble the following materials in preparation for the site visit. Items highlighted in green should be sent as an attachment to this document at least five business days prior to the scheduled site visit. All other items should be made available to the DPI site visit team during the site visit unless otherwise indicated.

Please note, if the charter school has opted to use its district's procedures for any of the required procedures described below, the school's governing board must provide meeting minutes showing the adoption of those district procedures.

<p>Documentation of purchases and receipts using CSP funds (Program Fiscal Report PI-1086)</p>	<p><i>The DPI has copies of all Program Fiscal Reports (PI-1086) submitted to date. Please compile and have available for review receipts or invoices corresponding to the purchases made using CSP funds.</i></p>
<p>Documentation and records that reflect work performed for salaries and wages paid with CSP funds</p>	<p><i>Provide a written description of the procedures used to determine that an individual's charges are allowable and properly allocated to the CSP grant. Please have this information available for review during the site visit. The written procedure should include:</i></p> <ul style="list-style-type: none"> • <i>Who determines whether an individual is eligible to be claimed on the CSP grant,</i> • <i>How it is determined that an individual is allowable to be claimed on the CSP grant (e.g. grant requirements, DPI technical assistance, etc.),</i> • <i>How the distribution of the individual's time is determined,</i> • <i>How work time is documented by the individual,</i> • <i>How time worked is recorded into the payroll system,</i> • <i>How compensation is allocated with the payroll system based on the distribution of the individual's time worked,</i> • <i>Who prepares claims for the CSP grant,</i> • <i>What is the process to verify the claim agrees to the actual compensation paid to the individual,</i> • <i>Who reviews claims,</i> • <i>Who signs claims, and</i> • <i>Who files claims with the DPI.</i> <p><i>*If you already have written procedures that cover these items or have prepared this information for another grant program or monitoring visit, you may use what you already have. Simply revise the applicable sections so that it is relevant to the CSP.</i></p>

	<p>Provide sample supporting documentation for one employee paid using CSP funds. The documentation should include:</p> <ul style="list-style-type: none"> • Payroll report for the individual selected from July 1 to current date. The payroll report should include the dates of payroll, compensation amount paid, general ledger account coding, total activity for which the employee is compensated and documentation supporting the actual hours worked and how the compensation is allocated for any individual who's compensation is allocated among more than one activity or cost objective or more than one federal or federal and non-federal award. If all of these items are not included in the payroll report, attach additional documentation as necessary.
Board composition	<p>DPI has a list of all current governance board members including their name, title, position and affiliation submitted by the school. Provide an updated list if the composition of the board has changed since the most recent submission of governance board roster.</p> <p>If the school has a relationship with a management organization, and the management organization is not the charter holder itself, indicate if the governing board is selected by, or includes members who are employees of, the management organization.</p>
Board meeting minutes	<p>Provide a copy of minutes from all board meetings that have occurred during the current project period.</p>
Board by-laws, non-stock corporation status, board policies & procedures	<p>DPI has received evidence of the governance board's non-stock corporation status. Provide evidence of the board's nonprofit status, 501(c)(3) status, if applicable, a current copy of the board's by-laws, and copies of all board policies and procedures.</p>
Verification of board training	<p>The grant application documents board training that has been/will be provided. Provide evidence of board training.</p>
Independent Annual Audit	<p>Provide a copy of the school's most recent independent audit and a link to the webpage where the audit is publicly available.</p>
Documentation that the school meets the federal definition of a charter school	<p>Provide a copy of the school's policy manual and/or handbook. Other documentation already on file at the DPI and provided by the school elsewhere will also be examined to ensure the school meets the federal definition of a charter school.</p>
Evaluation of school performance	<p>Provide a copy of the most recent evaluation of school performance. This can be a performance evaluation completed by the authorizer or a school-level evaluation.</p>

<p>Evidence of strong financial controls</p>	<p><i>Provide a copy of the fiscal policies that specify segregation of duties by position and person responsible and the procedures adopted to ensure proper internal controls for deposits and check writing. The policies should include an explanation of Petty Cash guidelines and allowable uses for Petty Cash. Also provide examples of monthly financial reports provided to the governance board, policies on annual audits that must be performed, and a copy of the school's most recent audit.</i></p>
<p>Procedures for managing equipment acquired in whole or in part using CSP funds</p>	<p><i>Provide the written procedures for equipment management including:</i></p> <ul style="list-style-type: none"> ● <i>Capitalization policy,</i> ● <i>Detailed property records that include:</i> <ul style="list-style-type: none"> ○ <i>Description of the property,</i> ○ <i>Serial number or other ID number,</i> ○ <i>Source of funding (property acquired with CSP funds should be identified),</i> ○ <i>Who holds title,</i> ○ <i>Acquisition date,</i> ○ <i>Cost of the property and percentage of federal funds used for the property,</i> ○ <i>Location of the property,</i> ○ <i>Use and condition of the property, and</i> ○ <i>Any disposition data including date of disposal and price of the property.</i> ● <i>Most recent physical inventory of the property including:</i> <ul style="list-style-type: none"> ○ <i>Documentation that the results were reconciled with property records,</i> ○ <i>Description of how the inventory was completed,</i> ○ <i>Date of the inventory and date of most recent prior inventory.</i> ● <i>Description of procedures to prevent and investigate loss, damage or theft,</i> ● <i>Description of policy when selling property that has been purchased with CSP funds.</i> <p><i>*If you have already prepared this information for another grant program or monitoring visit, you may use what you already have. You are not required to prepare the property records or inventory again. Be sure the property records and inventory clearly note what items were paid for with CSP funds.</i></p>

<p>Procurement Policy</p>	<p><i>Provide a copy of the school's procurement policy. The policy must include written standards of conduct covering conflicts of interest and governing the actions of employees, officers or agents engaged in the selection, award, and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. The procurement policy must also include written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.</i></p>
<p>Admission and Lottery Provisions</p>	<p><i>The admissions/lottery provisions have already been submitted to DPI. Provide a copy of the school's admission policy along with a copy of the procedures for conducting the random lottery if any of this information has changed. Also provide the student application and any application information disseminated during the current year.</i></p>
<p>General Education Provisions Act (GEPA) Plan</p>	<p><i>A GEPA statement/plan was included in the grant application. Provide an updated statement or plan if this information has changed.</i></p>
<p>Parental and community involvement</p>	<p><i>A description of how parents and community members are involved in the planning or implementation and operation of the charter school was included in the grant application. Provide an updated description if any of this information has changed.</i></p> <p><i>Provide evidence that the school has included parents and community members in a manner consistent with the description in the application or the updated description (e.g. parent survey results, meeting minutes, meeting attendance records, letters from parents and community members, etc.).</i></p>
<p>Performance Measures</p>	<p><i>A list of the school's performance measures is available in the school's Performance Measure Review report. Please have information available to verify the data that was submitted as part of previous Mid-year and Year-end Reports.</i></p>
<p>Student data including performance, attendance, graduation and discipline</p>	<p><i>Provide current data on student performance, attendance, graduation, and discipline.</i></p>

<p>Other Materials disseminated</p>	<p><i>Provide a copy of all current year announcements, newsletters, advertisements, public meeting announcements regarding board meetings, parent/community meeting information, informational pamphlets, and any other materials disseminated during the current year related to admissions, application, or general advertisements. Please have all of this information available for review during the site visit.</i></p>
<p>Link to the school's website</p>	<p><i>Provide a link to the school's website. The website must include:</i></p> <ul style="list-style-type: none"> • <i>Information on the educational program,</i> • <i>Student support services,</i> • <i>Parent contract requirements (as applicable) including any financial obligations or fees,</i> • <i>Enrollment criteria,</i> • <i>Annual performance and enrollment data for each of the subgroups of students (i.e. minority, low-income, special ed, ELL, etc.) except in cases where disaggregation of such data would reveal personally identifiable information about an individual students or the number of students within a subgroup is too small to yield statistically reliable information.</i>
<p>Charter Schools with Management Organization</p>	<p><i>If the school has a relationship with a management organization, and the management organization is not the charter holder itself, provide a copy of the contract between the school and the management organization, information about any fee paid by the charter school to the management organization, and any other agreements (such as loans and leases) between the school and the management organization.</i></p>

REVIEWER INSTRUCTIONS FOR THE SITE VISIT MONITORING RUBRIC

During the site visit, the reviewer (or review team) will be monitoring the school's progress in several areas, including the following:

- ◇ Achieving all required and school-developed grant and education objectives.
- ◇ Documentation of all CSP-funded purchases and one-time expenses (including positions funded, lease/rent, and insurance).
- ◇ All CSP obligations/purchases must fall within the allowable award period.
- ◇ All CSP obligations/purchases are allowable and school has implemented an inventory control procedure.
- ◇ School meeting federal and state definition of charter school and demonstrating autonomy.
- ◇ All purchases only benefit students of the charter school receiving CSP grant funds.
- ◇ Recruitment, lottery, admission, and retention policies and practices comply with applicable law.
- ◇ Minimizing the risk of fraud.

All indicators must be fully met to be in compliance. The reviewer may request additional information during or following a site visit to gather necessary documentation. An action plan will be used when the school must demonstrate compliance with documentation of specific actions.

The reviewer will use a check or minus system to evaluate the quality in which each indicator was achieved. When multiple criteria are given, all must be met.

The reviewer will write specific comments in the Action Required/Comments section to clearly indicate what additional documentation, clarification, or action is necessary to ensure the school demonstrates full compliance.

The next page shows a blank version of the Charter School Site Visit Monitoring Rubric. The remaining pages include all indicators that will be used during the scheduled site visit.

Indicator: Definition of Indicator		
Documentation: List necessary documents or evidence		
Criteria	Status	Action Required/Comments
Specific question, documentation, or policy to be reviewed	✓ Met ◇ The school has provided all necessary documentation for this criterion. ◇ School complies with ESSA and other related non-regulatory guidance. ◇ Policies are in compliance with relevant guidelines in the Uniform Grant Guidance and EDGAR.	
	— Not Met Documentation is lacking or some processes need to be refined for full compliance with this criterion.	For criteria not met, the reviewer will request specific documentation or action items within a given deadline. If necessary, the reviewer will indicate that a Corrective Action Plan (CAP) is required and will follow-up with a written request for information, documentation and/or policies requiring additional development with specific deadlines.
	NA Not applicable The criterion is not applicable.	For criteria marked Not Applicable (NA), reviewer will describe the reason.
Total Criteria:	# Met _____ # Not met _____ # N/A _____	
Key: ✓ Met – Not met (Specify action/documentation required) NA Not applicable - Explain		

Indicator 1: Lottery, Recruitment, and Retention

The charter school complies with the lottery, recruitment, and retention provisions contained in state and federal law.

Documentation: Lottery and admission policy, charter contract, registration announcements, application, school pamphlets, and authorizer monitoring documentation.

Criteria	Status	Action Required/Comments
1. The school is implementing its plan to attract, recruit, admit, enroll, serve, and promote retention of students, including educationally disadvantaged students. The charter school authorizer has monitored this criteria to ensure compliance.		
2. The school has a lottery policy that clearly states a random selection process will be implemented when the school receives more applications than seats available.		
3. The school's random selection process creates a rank order of students which is used to generate an initial waitlist, if applicable.		
4. The school's lottery process clearly defines allowable exemptions/preferences.		
5. If necessary, the school used a lottery process during the current school year and followed its established guidelines.		
6. The charter school has made publicly available, including on the school's website the following information: <ul style="list-style-type: none">● Information on the educational program,● Student support services,● Parent contract requirements (as applicable) including any financial obligations		

<ul style="list-style-type: none"> or fees, • Enrollment criteria, • Annual performance and enrollment data for each of the subgroups of students (i.e. minority, low-income, special ed, ELL, etc.) except in cases where disaggregation of such data would reveal personally identifiable information about an individual student or the number of students within a subgroup is too small to yield statistically reliable information. 		
<p>8. The school does not have any admission requirements that interfere with a fair and open admissions process.</p>		
<p>Total Criteria:</p>	<p># Met _____</p> <p># Not met _____</p> <p># N/A _____</p>	
<p>Key: ✓ Met – Not met (Specify action/documentation required) NA Not applicable - Explain</p>		

Indicator 2: Financial Records

The charter school utilizes an acceptable and appropriate system for maintaining financial records related to CSP purchases.

Documentation: Documentation of all purchases (PI-1086) and receipts using CSP funds, documentation and records for salaries and wages paid with CSP funds that accurately reflect the work performed, including a written procedure used to determine an individual's charges that are allowable and properly allocated to the CSP grant, and sample supporting documentation for one employee paid using CSP funds.

Criteria	Status	Action Required/Comments
1. School has a clearly organized system for maintaining receipts/invoices for all purchases made with CSP Funds.		
2. Reviewer will randomly select and review at least 40% of receipts/invoices from current or specific program performance period. Clearly identifiable receipts can be matched to the approved CSP budget for any items selected by the reviewer. All items/services purchased with CSP funds are allowable.		
3. School stores receipts and financial records in a manner that minimizes possibility of destruction (locked, fireproof storage, regular off-site backups of electronic records).		
4. The written procedure used to determine salaries and wages paid by the CSP grant includes all applicable components and is sufficient to determine allowable charges for salaries and wages.		
5. The sample documentation provided includes all required components and is sufficient to determine that salaries and wages paid using CSP funds are properly recorded and tracked in the payroll system.		

Total Criteria:	# Met _____ # Not met _____ # N/A _____	
Key: √ Met – Not met (Specify action/documentation required) NA Not applicable - Explain		

Indicator 3: Fraud

The charter school segregates among staff or directors various financial duties to minimize the risk of fraud or misuse of funds.

Documentation: Evidence of strong financial controls, internal financial controls, and segregation of duties.

Criteria	Status	Action Required/Comments
1. Approved policies specify segregation of financial duties by position/person responsible.		
2. Policy requires multiple signatures for checks over a specified amount by position.		
3. Check writing and deposits are done by separate individuals.		
4. Access to Petty Cash guidelines and allowable uses are included in the school's financial policies.		
Total Criteria:	# Met _____ # Not met _____ # N/A _____	

Key: ✓ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator 4: Monthly Financial Statements to Governing Board and Board Oversight

The charter school administration provides monthly financial reports to its governing board for review and approval and board demonstrates fiduciary oversight.

Documentation: Examples of monthly financial reports and documentation in board minutes that they have been submitted for review/approval and documentation in minutes of financial oversight by the board.

Criteria	Status	Action Required/Comments
1. School generates monthly financial statements for the governing board.		
2. School submits and governing board reviews and approves monthly financial statements (documented in board minutes).		
3. Governing board reviews and approves budget and budget amendments (documented in board minutes).		
4. Governing board meeting minutes document discussions demonstrating fiduciary oversight of school (ex. financial and procurement policy discussions, review of monthly financial statements, development/ review/revisions/ approval of school budget, purchases, etc.).		
Total Criteria:	# Met _____ # Not met _____ # N/A _____	

Key: ✓ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator 5: Financial and Programmatic Audit

The charter school complies with the same federal and state audit requirements as do other elementary and secondary schools in the state and has an annual independent audit of its financial statements prepared in accordance with generally accepted accounting principles, reviewed by the school's authorizer, and publicly recorded.

Documentation: Contract, authorizer annual report, and copy of publicly posted audit(s).

Criteria	Status	Action Required/Comments
1. The school has an annual independent financial audit.		
2. The charter contract requires a financial and programmatic audit.		
3. When was the most recent independent annual audit completed? Date completed: _____		
4. Has the school submitted a copy of the audit findings to its authorizer? Date completed: _____		
5. The audit is publicly recorded on the school's website.		
6. The school's authorizer has submitted the most recent annual authorizer report to the DPI, and the report was completed correctly and completely (<i>Authorizer reports are due by December 1 for the preceding school year</i>).		
Total Criteria:	# Met _____ # Not met _____ # N/A _____	

Key: √ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator 6: Inventory

The charter school has implemented an inventory control procedure that ensures items purchased with CSP funds are identified, marked, and accounted for on a regular basis.

Documentation: Equipment management procedures including capitalization policy, property records, inventory report, loss, damage, and theft prevention policy, policy on property sales, and procurement policy that includes standards of conduct covering conflicts of interest.

Criteria	Status	Action Required/Comments
1. Does the school have an inventory control system for capital equipment?		
2. How often does the policy require a full inventory? Most recent inventory date: _____		
3. Was the most recent inventory reconciled to the property records? Were any items of concern properly investigated?		
4. All CSP purchases are clearly identified and included in the inventory report and property records.		
5. Do the property records show item, date purchased, inventory date, condition, room number, item ID number, etc., as required for capital equipment?		
6. How does inventory system account for lost, stolen, or damaged items?		
7. Is there a capitalization policy?		
8. Are capital assets (items or equipment purchased with CSP funds) identified with unique code, school name, and LEA name?		
9. Do any school loans use capital assets purchased by CSP as collateral? Please note that this is <u>not allowable</u> .		

10. Do the property records and most recent inventory report show the final disposition date, reason, and how CSP funded items were removed from inventory?		
11. Policy on the sale of property purchased with federal funds is included. If any property purchased with CSP funds was sold, the procedure was followed.		
12. Does the landlord have the right to confiscate capital assets purchased with CSP funds? Please note that this is <u>not allowable</u> .		
13. Does the procurement policy include sufficient statements covering conflicts of interest?		
Total Criteria:	# Met _____ # Not met _____ # N/A _____	
Key: ✓ Met – Not met (Specify action/documentation required) NA Not applicable - Explain		

Indicator 7: Charter School

The grant recipient meets the definition of the term “charter school” in section 4310 of the ESSA.

Documentation: Approved charter contract, non-stock corporation and nonprofit status documentation, grant application, lottery and admission policy, school policy manual, governing board roster, and evidence of autonomy (interviews and applicable documentation). If applicable, the contract between the school and the management organization, information about any fee paid by the charter school to the management organization, and any other agreements (such as loans and leases) between the school and the management organization.

Criteria	Status	Action Required/Comments
1. The school has an approved charter contract with its authorizer. Date contract signed: _____		
2. The school is a nonprofit entity and is a non-stock corporation under Wisconsin law. Date status approved: _____ Check if also: ___ 501(c)(3)		
3. The school application materials clearly state that the charter school is a tuition free public school.		
4. The charter school provides a program of elementary or secondary education, or both.		
5. The school was created by a developer as a public school.		
6. The charter school has a clear lottery policy.		
7. The school is receiving the following federal funds: Title I, Part A; Title II, Part A; Title II, Part D; Title III, Part A; Title IV, Part A; Title V, Part A; Title VI, Part B (for eligible LEAs/schools)		

<p>8. The charter school is non-sectarian in its programs, admissions policies, employment practices, and all other operations and is not affiliated with a religious institution.</p>		
<p>9. All items purchased with CSP funds only benefit the students attending the charter school receiving the CSP award.</p> <p><u>Charter schools that share facilities:</u> CSP recipients that share facilities with other schools at the same location demonstrate that only their students benefit from CSP-funded purchases of goods/services.</p>		
<p>10. The charter school contract describes how student performance will be measured. It includes information about any additional assessments that are required in addition to the state assessments required of all public school students.</p>		

<p>11. The charter school demonstrates through its contract, policies, procedures, and board minutes that it has a high degree of autonomy in governance structure, operations, financial decisions, and staffing decisions.</p> <p><u>Charter schools that are instrumentalities of a district:</u> The hiring process for charter school staff during the grant period demonstrates a high degree of autonomy from the district and aligns with the process described in the grant application and charter contract.</p> <p><u>Charter schools that have a relationship with a management organization that is not the charter holder itself:</u> The submitted documentation demonstrates that the charter school is independent of the management organization.</p>		
<p>12. The charter school complies with the Age Discrimination Act of 1975, Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act of 1990, section 444 of GEPA, Title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, and Part B of the IDEA.</p> <p><i>This includes all assurances provided in Public Charter Schools Grant Application.</i></p>		<p>During site visit, reviewer will record any questions or concerns that may entail additional follow-up or requests for information.</p>

Total Criteria:	# Met _____ # Not met _____ # N/A _____	
Key: ✓ Met – Not met (Specify action/documentation required) NA Not applicable - Explain		

Indicator 8: Grant Objectives and Parental and Community Involvement

The charter school is on track to meet grant objectives and complete grant activities.

Documentation: Grant application, Performance Measure Review report, student accountability data, and evidence of completed activities.

Criteria	Status	Action Required/Comments
1. The educational program/grant activities observed matches the grant application description.		
2. Objectives articulated in the interview match objectives described in the grant application.		
3. The school has met its objectives related to sharing best and promising practices with other charter schools and public schools.		
4. If objectives have been modified, are revisions appropriate?		

<p>5. The school measures performance and demonstrates improved student achievement based on the school's Performance Measure Review report and additional submitted data. The data submitted as part of the most recent Mid-year or Year-end Report can be verified.</p> <p>The school has provided annual student achievement data, including but not limited to, attendance, growth, attrition, and graduation rates for all students and student subgroups. Evidence provided demonstrates the school is meeting the needs of all students including educationally disadvantaged students.</p>		
<p>6. School submits all data and forms to the DPI in a timely manner.</p>		
<p>Total Criteria:</p>	<p># Met _____</p> <p># Not met _____</p> <p># N/A _____</p>	
<p>Key: ✓ Met – Not met (Specify action/documentation required) NA Not applicable - Explain</p>		