

Monitoring Instrument

Charter Schools Program Grant

Tennessee Department of Education | 2025–26



Overview of Charter Schools Program (CSP) Subgrant Monitoring

Definition and purpose of monitoring

The Tennessee Department of Education (the department) designed its Charter Schools Program (CSP) monitoring plan with three purposes in mind:

- 1) to assess the extent to which grantees are implementing their approved grant projects in compliance with statutes, regulations, and guidance;
- 2) to examine effective uses of CSP grant funds in Tennessee charter schools; and
- 3) to support the overall strategy for increasing the number of high-quality charter schools in the state

Types of Subgrant Monitoring

The department will monitor CSP subgrantees beginning in the planning year and then during the first and second year of operation to ensure grant subrecipients are in compliance with all CSP requirements.

Desktop monitoring will be used as an efficient way to assist grantees with funding requests and review school performance on a regular basis. The department will utilize desktop monitoring to document reimbursement requests, receipts, inventory logs, and financial statements, and to ensure compliance with standard bidding procedures and uniform guidance.

Onsite monitoring of subgrantees will occur at least once during each year of the grant period. Every recipient will receive an onsite visit in years one, two, and three unless the recipient qualifies for a **virtual site visit**. Grant recipients that are in good standing with all program requirements as determined by their monitoring report may qualify for a virtual site visit in years two and/or three.

Types of Subgrant Monitoring					
Grant Year	Spring	Fall			
Planning	Onsite Monitoring	Desktop Monitoring			
Implementation 1	Onsite Monitoring Or Virtual Site Visit	Desktop Monitoring			
Implementation 2	Onsite Monitoring Or Virtual Site Visit	Desktop Monitoring			

Onsite Monitoring Timeline

The department conducts a site visit each year for each school that has an active CSP subgrant. The purpose of the site visit is to determine how well the subgrantee is meeting the requirements and guidelines of the grant. Site visits focus on governance, operations, finance, and the quality of the educational program. The process is outlined below:

Onsite Monitoring Timeline				
Date	Step	Description		
December	Scheduling	The department will contact each school that has an active CSP subgrant to determine the school's primary point of contact for monitoring (PPOC). The Charter Schools Program Team and the PPOC will schedule a date and time for the site visit.		
January	Training	The department will host a training for subgrant recipients that provides an overview of onsite monitoring visits, document submission requirements, and annual reporting.		
February	Document Submission	The PPOC shall provide all required documents to the department no later than 10 business days prior to the date of the site visit. These documents will be reviewed prior to the site visit. A list of these documents can be found on page 5.		
March - April	Site Visits	During the site visit, the department shall conduct interviews, inspect documents, and otherwise inquire about CSP expenses and policies. The school's Executive Director/CEO, Fiscal Representative, Board member, and PPOC shall be available during the site visit.		
May	Reporting and CAP	By May 1, the department will complete and submit the Monitoring Report to the school. If any areas of non-compliance are identified, the Charter Schools Program Team will submit a Compliance Action Plan (CAP) to the school to be resolved within 6 months.		

Monitoring Reports and Corrective Action Plans

After the completion of onsite monitoring, the department will provide subgrantees with a thorough assessment of grant compliance and outline any required steps to address compliance issues.

Subgrantees will receive the following compliance assessment documents by May 1 each year:

- Monitoring Report
- Compliance Action Plan (if compliance issues are found)

All subgrantees will receive a **Monitoring Report**. This document reflects the monitoring team's analysis and assessment of all the evidence collected during the monitoring process. The Monitoring Indicators used to evaluate subgrantee compliance can be found on pages 8-18 of this document.

If any areas of non-compliance are identified, subgrantees will also receive a **Compliance Action Plan** (CAP). This document lists any compliance issues discovered, the steps needed to address the issues, the timeline for correction, and the documentation required to demonstrate compliance. Any follow-up monitoring related to a CAP must be completed within 6 months of the site visit with all issues resolved within 12 months of the school's receipt of the CAP. A template for the CAP can be found in Appendix B of this document.

Monitoring Reports are categorized as either *Closed* or *Incomplete Pending the Fulfillment of the Compliance Action Plan*. Upon resolution of all issues in the CAP, the Monitoring Report is categorized as *Closed*.

Following the site visit, the primary point of contact for monitoring (PPOC) has the following responsibilities:

- 1. Obtain all school signatures on the Monitoring Report and the CAP (if applicable) and submit the fully executed documents to the Manager of Choice Grants Monitoring within 14 days of receipt.
- 2. Work diligently to resolve any issues identified in the CAP.
- 3. Coordinate on behalf of the school and cooperate in any follow-up monitoring and reporting.

Monitoring Documentation

The primary point of contact for monitoring (PPOC) shall provide the following documents to the Office of Choice no later than 10 business days prior to the onsite or virtual site visit. These documents will be reviewed prior to the site visit.

Section	1: Charter School Definition
	Signed charter agreement
	Agreement with Charter Management Organization and/or network, if applicable
	Most recent audit report
	Written enrollment policy and procedure
	Lottery policy and procedure
	School application and outreach materials for previous 12-month period
	Articulation agreements
Section	2: General Financial Management
	Most recent Board-approved budget
	Finance Manual/Handbook or all written financial policies and procedures
	Evidence of signature authority (e.g. sample purchase approval, sample purchase order)
Section	3: Contracts and Procurement
	Contract/procurement policies/procedures in compliance with federal regulations
	Conflict of interest policy and evidence of signed COI forms
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Section	4: Use of CSP Funds
	CSP procurement evidence (e.g. quotes, RFPs, bids, selection justification, etc.)
	Financial records policy, stating how long records are kept on file
	Time and effort sheets for salaries paid with CSP funds
Section	5: Inventory, Property, and Equipment
	Inventory policies/procedures in compliance with federal regulations
	Current inventory log/report which includes all CSP purchased items
	Disposition policy
Section	6: Self-Assessment
	Completed self-assessment form (Appendix A)
Section	7: Governance
	Board Agendas and Minutes forpreceding 12-month period
	Governing board 501(c)(3) documentation
	Evidence of a strategic plan
	Evidence of a strategic plan

Monitoring Report

By May 1, the department will complete and submit the Monitoring Report to the school. The purpose of the Monitoring Report is to determine how well each subgrantee is meeting the requirements and guidelines of the CSP grant. A template Monitoring Report is included below.

The Monitoring Report includes:

- School Contacts
- Assurances
- Monitoring Status
- Monitoring Indicators and Acceptable Evidence
- Compliance Action Plan, if needed

School Contacts

Monitoring Status

☐ Closed	□ Pending	Compliance wit	ո Compliance	Action	Plan	(CAP)
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TDOE Position/Title	Printed Name	Signature
Senior Director of School Choice Programs and Grants		
Manager of Choice Grants Monitoring		

Monitoring Indicators

The department ensures grant subrecipients comply with all CSP requirements by assessing monitoring indicators. Evaluation of each monitoring indicator is tied to specific monitoring documents and is then supplemented by onsite monitoring interviews.

Each subrecipient receives a score of Meets, Partially Meets, or Does Not Meet on each required monitoring indicator. Any school that receives a Partially Meets or Does Not Meet in a category on the monitoring instrument receives a Compliance Action Plan (CAP). The CAP includes any item not fully in compliance and requires the school and department to devise a plan to address any deficiency.

Section 1: Charter School Definition				
	Indicator	Evidence of Program Implementation	Indicator Rating	Notes
Indicator 1.1	The school provides a program for elementary or secondary education, or both.	☐ Signed charter agreement☐ Enrollment data☐ School website	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 1.2	The school has an independent governing body with 501(c)(3) status	□ 501(c)(3) documentation	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 1.3	The school has an approved charter agreement with its authorizer that describes the rights and responsibilities of the school and the authorizer.	□ Signed charter agreement	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	
Indicator 1.4	The charter agreement describes how student performance will be measured and includes state assessments required of all public-school students.	□ Signed charter agreement	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	
Indicator 1.5	The school agrees to comply with the same federal and state audit requirements as do other elementary schools and secondary schools in the state.	☐ Signed charter agreement ☐ Audit Reports	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	

Section 1: Charter School Definition

	Indicator	Evidence of Program Implementation	Indicator Rating	Notes
Indicator 1.6	The school complies with federal laws including, but not limited to, the Age Discrimination Act of 1975, Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, and Part B of the Individuals with Disabilities Education Act.	☐ Signed charter agreement☐ School website☐ Enrollment policy and procedures	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	
Indicator 1.7	The school is non-sectarian in its programs, admissions policies, employment practices and all other operations and is not affiliated with a religious institution.	☐ Signed charter agreement☐ Enrollment policy and procedures	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 1.8	The school application policy and procedures, including all processes and materials, are in compliance with state and federal laws.	☐ Enrollment policy and procedures ☐ School application and outreach materials	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 1.9	The school's lottery procedures comply with CSP nonregulatory guidance, T.C.A. § 49-13-113 and SBE Rule 0520-14-0104.	☐ Lottery policies and procedures	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 1.10	The school provides education services for students with disabilities, English learners, and other students with diverse needs, in accordance with state and federal law.	☐ Signed charter agreement☐ Enrollment data☐ School website	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	

Section 1: Charter School Definition

	Indicator	Evidence of Program Implementation	Indicator Rating	Notes
Indicator 1.11	The school is a tuition-free public school	☐ Signed charter agreement☐ School website	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 1.12	The school's current enrollment data aligns with CSP application proposal, including grades served, number of available seats, number of students enrolled, faculty/staff, student demographics, and number of special education and EL students	□ Enrollment data	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	
Indicator 1.13	School enrollment policies include any articulation agreements between associated schools, if applicable.	☐ Articulation agreements	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	
Indicator 1.14	The charter school has made publicly available on the school's website the following information: the educational program, student support services, parent contract requirements including any financial obligations or fees, enrollment criteria, and the annual State report card grade.	□ School website	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	

Section 2: General Financial Management

	Indicator	Evidence of Program Implementation	Indicator Rating	Notes
Indicator 2.1	The school submits, and the governing board reviews and approves financial statements on a regular basis.	☐ Board agendas and minutes☐ Finance Policies/Procedures	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	
Indicator 2.2	Governing board meeting minutes document discussions demonstrating fiduciary oversight of school.	☐ Board agendas and minutes	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 2.3	The school has a board policy / procedure governing the preparation and approval of budgets and budget revisions.	☐ Finance Policies/Procedures	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 2.4	The school follows internal controls relating to signature authority for contracts and expenditures.	☐ Finance Policies/Procedures	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 2.5	Approved policies specify segregation of financial duties by position/person responsible.	☐ Finance Policies/Procedures	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 2.6	The school has written procedures which comply with federal regulations for cash management. (Uniform Grants Guidance 200.302(b)(6))	☐ Finance Policies/Procedures	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 2.7	The school has written financial policies and procedures that comply with federal regulations.	☐ Finance Policies/Procedures	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	

Section 3: Contracts and Procurement

	Indicator	Evidence of Program Implementation	Indicator Rating	Notes
Indicator 3.1	The school has written procurement procedures that comply with federal regulations, and document prior approval of purchases.	☐ Contract/Procurement policies and procedures ☐ Sample purchase order	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 3.2	The school has a system of internal controls for developing and awarding contracts.	☐ Contract/Procurement policies and procedures ☐ CSP procurement evidence	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	
Indicator 3.3	The school has a policy / procedure for awarding contracts that ensures appropriate approval.	☐ Contract/Procurement policies and procedures ☐ CSP procurement evidence ☐ Sample purchase order	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 3.4	Contracts with third party contractors meet all federal requirements and are approved and monitored by the school.	☐ Contract/Procurement policies and procedures ☐ CSP procurement evidence	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 3.5	The governing board has adopted and implemented a Conflict-of-Interest Policy that prevents real or apparent conflicts of interest.	☐ Finance Policies/Procedures☐ Conflict of interest policy and signed COI forms	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	
Indicator 3.6	Board minutes document when a member has a real or apparent conflict of interest, and the member has abstained from voting on any related business items.	☐ Board agendas and minutes	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	

Section 4: Use of CSP Funds

	Indicator	Evidence of Program Implementation	Indicator Rating	Notes
Indicator 4.1	The school spends funds according to the approved grant budget and/or amends the grant budget when expenditures represent >15% change in any budget category.	□ ePlan reimbursements□ ePlan funding application□ CSP procurement evidence	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 4.2	The school has records to support whether funds were obligated and liquidated within the approved grant period.	□ ePlan reimbursements □ CSP procurement evidence	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 4.3	Funds are drawn down from ePlan regularly in correlation to expenditures.	□ ePlan reimbursements	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 4.4	Funds are being requested and reported as expended at least quarterly.	□ ePlan reimbursements	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 4.5	Funds are spent or encumbered in accordance with the schedule in the application.	□ ePlan reimbursements	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 4.6	The school maintains separate accounting records for CSP, which reflect the line items and amounts approved in the CSP application / budget.	☐ ePlan budget and reimbursements ☐ Most recent Board-approved budget	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 4.7	CSP procurements were made in compliance with Federal regulations including vendor/contractor selections.	☐ Contract/Procurement policies and procedures ☐ CSP procurement evidence	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	

Section 4: Use of CSP Funds

Indicator		Evidence of Program Implementation	Indicator Rating	Notes
Indicator 4.8	The school has a clearly organized system for maintaining receipts/invoices for all CSP-funded purchases.	□ Evidence of organized receipts/invoices	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	
Indicator 4.9	Clearly identifiable receipts can be matched to the approved CSP budget for any selected items.	□ ePlan budget and reimbursements□ Evidence of organized receipts/invoices	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	
Indicator 4.10	All items/services purchased with CSP funds are allowable, reasonable, and necessary, and allocable.	□ ePlan budget and reimbursements	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 4.11	All financial records and programmatic records, supporting documents, statistical and other records are maintained for 5 years or until the resolution of any litigation, claim, negotiation, audit, or other action involving records.	□ Financial records policy	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 4.12	The school maintains personnel activity records that support the distribution of salaries for CSP funded employees.	☐ ePlan budget and reimbursements ☐ Time and effort sheets	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	

Section 5: Inventory, Property, and Equipment

	Indicator	Evidence of Program Implementation	Indicator Rating	Notes
Indicator 5.1	The school has written policies / procedures regarding inventory, property and equipment that comply with state and federal regulations.	□ Inventory policies/procedures	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 5.2	The school has an inventory database which contains the following elements: a) description of the item, b) serial number, barcode and other identifying numbers c) source of the item, d) titleholder, e) acquisition date, f) cost, g) percentage of Federal participation in the cost, h) physical location of item, i) use and condition, and j) disposition data (date, method of disposition) if property is retired from service.	□ Inventory log	☐ Meets Requirement ☐ Partially Meets Requirement ☐ Does Not Meet Requirement	
Indicator 5.3	The school has a physical inventory of the property at least once every year	☐ Inventory Policy/ Procedure	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 5.4	The school has a control system to ensure adequate safeguards to prevent loss, damage or theft of the property (includes notifying local law enforcement and ensuring that a police report is filed when it is discovered equipment has been stolen)	□ Inventory Policy/ Procedure	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	

Section 5: Inventory, Property, and Equipment

	Indicator	Evidence of Program Implementation	Indicator Rating	Notes
Indicator 5.5	The school has policy regarding the disposition of equipment that is obsolete or no longer needed for the original program for which it was purchased	☐ Inventory Policy/ Procedure ☐ Disposition policy	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 5.6	The school has a policy/procedure for the proper disposal of equipment, which includes ensuring the highest possible return if the school is authorized or required to sell equipment.	☐ Inventory Policy/ Procedure	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 5.7	The school has a board policy / procedure for proper disposal of equipment that addresses the disposal of equipment with a fair market value of >\$10,000.	☐ Inventory Policy/ Procedure	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 5.8	Any equipment purchased with CSP funds was essential to and purchased for the benefit of the CSP program.	☐ ePlan budget and reimbursements ☐ Inventory log	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	

Section 6: Self-Assessment

Indicator		Evidence of Program Implementation	Indicator Rating	Notes
Indicator 6.1	The school summarizes progress made on each goal and objective of its CSP application.	☐ Self-Assessment	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 6.2	The school provides an overview of how CSP funds have been expended and details upcoming CSP expenditures.	☐ Self-Assessment	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 6.3	The school details its relationship with its authorizer, including collaboration practices, clarity around roles and responsibilities, and any challenges faced.	□ Self-Assessment	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 6.4	The school demonstrates improved student achievement through its educational program and performance data.	☐ Self-Assessment ☐ Annual report	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	

Section 7: Governance

Indicator		Evidence of Program Implementation	Indicator Rating	Notes
Indicator 7.1	The governing body has adopted a strategic plan for the organization.	□ Strategic plan	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 7.2	The governing body involves parents and other community stakeholders in the planning, program design and implementation of the charter school.	☐ Board minutes ☐ Outreach materials	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	
Indicator 7.3	The school provided a CMO/Network contract that complies with CSP requirements, if applicable	□ CMO/Network contract	☐ Meets Requirement☐ Partially Meets Requirement☐ Does Not Meet Requirement	

Appendix A – Self Assessment

In preparation for onsite monitoring, subgrantees complete a brief self-assessment. This self-assessment includes opportunities for schools to reflect on progress towards specific CSP grant goals, upcoming CSP expenditure plans, relationships with authorizers, and student performance. These reflection areas inform onsite monitoring and help the department evaluate effective uses of grant funds.

onsite monitoring and help the department evaluate effective uses of grant funds.
Prompt:
Provide a summary of your school's progress on each goal and objective of your CSP application.
Response:
Prompt:
Provide an overview of how CSP funds have been expended so far as well as any upcoming CSP expenditures.
Response:

Prompt:

Provide an overview of your school's relationship to your authorizer. Please include your collaboration practices, each of your roles and responsibilities, and any challenges faced.

Response:

Prompt:

Provide an overview of student achievement since the CSP grant award. This should include details of your school's educational program and its impact on student performance data.

Response:

Appendix B - Compliance Action Plan

CSP Monitoring: Compliance Action Plan

Tennessee Department of Education
Date of Site Visit:

[School Name]

1. COMPLIANCE ACTION	PLAN		
Compliance Issue	Action Step	Required Documentation	Deadline for Completion
2. SCHOOL REQUESTS FO	R TDOE TECHNICAL	ASSISTANCE	
a TROE IMARROMENTALIT	DECOMMAND ATION	16	
3. TDOE IMPROVEMENT	RECOMMENDATION	NS .	
4. SIGNATURES			
Signature below assures a review a	nd understanding of the al	pove information and the steps	necessary to come into complian
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Executive Director / CEO Signat	cure Date	TDOE Representative	e Signature Date
Board Member Signature			