

Children's Village Academy (54A) 21st Century Community Learning Centers (CCLC) Grant Compliance Issues

*North Carolina Department of Public Instruction
Office of Federal Programs*

*Susan Brigman, Section Chief ~ Specialty Programs
Wendy Buck, 21st CCLC Program Administrator
Monica Pask, 21st CCLC Fiscal Monitor
Melba Strickland, 21st CCLC Program Coordinator*

North Carolina Department of Public Instruction

Office of Federal Programs (OFP) ~ 21st CCLC Program Team

Leadership

Alex Charles~ Director, FPMS
Susan Brigman, Section Chief ~ Specialty Programs

NCDPI Fiscal Team

Katrina Blount- Fiscal Monitor
Ashton Moss- Fiscal Monitor
Monica Pask- Fiscal Monitor

NCDPI 21st CCLC Program Administrators

Areli Perez: West and Northwest
Dr. Darren Hamilton: Southwest
Gina White: Piedmont-Triad and North Central
Kendall Cook: North Central
Hawhana Locklear: Sandhills
Wendy Buck: Northeast and Southeast

NCDPI Data Management

Anita Harris- Data Quality Manager
& Business Analyst

Program Coordinator

Melba Strickland

Email addresses are firstname.lastname@dpi.nc.gov

FY23 21st CCLC Summer Mini Grant Requirements

Eligibility to Apply: Current 21st CCLC Grantees

- Applicants who currently hold a 21st CCLC Grant (Cohort 14, Cohort 15 and/or Cohort 16) are only eligible to apply for the 21st CCLC FY23 Competitive Summer Mini-Grant Program if they meet the following criteria:
- The applicant is proposing **new programming** by serving additional feeder-schools and targeted students not currently being served by the applicant's existing 21st CCLC program.
- This means that any currently funded 21st CCLC organizations applying for new funding may not apply for duplicate funding for the same project and schools/sites.



**21ST CCLC FY23 Competitive Summer Mini-Grant (SMG)
BASIC PROGRAM INFORMATION**
Competitive Grant Program 2023
Revised November 2022



Original Basic Program Information Sheet for FY23 SMG as Approved by SBE dated 2/2/23

Program Dates 7/17/23-8/18/23

I. Basic Information of Organization Applying for 21 ST CCLC FY23 Competitive SMG Funding	
Fiscal Agent Organization Name:	Children's Village Academy
Fiscal Agent Organization Unit Number #:	54A
Fiscal Agent Organization Dunn & Bradstreet #:	003793994
Fiscal Agent Organization Tax ID #:	56-1991767
Fiscal Agent Organization Physical Address:	701 N. Adkin Street, Kinston, NC 28501
Requested Grant Award:	\$299,000.00
County(ies) Served by Proposed 21 ST CCLC SMG:	Lenoir, Pitt, Greene
Fiscal Agent Chief Administrator Name:	Jessica Jones
Fiscal Agent Chief Administrator Email Address:	jjones01@cvtatigers.com
Fiscal Agent Chief Administrator Phone Number:	252 939-1958
Chief Finance Office Name (if appropriate):	Melba Lovick
Chief Finance Office Email (if appropriate):	mllovick@yahoo.com
Chief Finance Office Phone (if appropriate):	252 521-0006
If submitting a Joint Application, provide name of Partnering Agency:	n/a

II. Other Summer Federal Funding Sources (if applicable)	
If your organization is receiving other federal funds to support the implementation of summer programs between April 12 – September 1, 2023, please indicate the other federal grant sources below:	
<input checked="" type="checkbox"/> 21 ST CCLC Cohort 14, 15, 16	<input type="checkbox"/> FY22 ELISS
<input type="checkbox"/> Other (please type in):	<input type="checkbox"/> ESSER 176
	<input type="checkbox"/> ESSER 177
	<input type="checkbox"/> Not Applicable

III. Basic Information of 21 ST CCLC FY23 Competitive SMG Program Components			
21 ST CCLC FY23 SMG Program Name:	Project MAP		
SMG Program Director Name:	Carmelita Grady, Ph.D.		
SMG Program Director Email:	carmelitagrady@yahoo.com		
SMG Program Director Phone Number:	202 299 7863		
FY23 Competitive SMG Programs:	Number of Student Slots:	Dates of Programming From:	Total Number of Weeks Students Served:
	120	7/17/23 to 8/18/23	5

III. 21 ST CCLC FY23 COMPETITIVE SMG PROGRAM SITE/CENTER INFORMATION (complete for each site/center):			
Site # 1 Location Name & Physical Address: 404 Dixon Street Kinston, NC	Days/Hours of Operation: 7:30am-8:00pm	Phone #: 252 939-1958	Site Director Name and Email Address: Gloria Carr-Battle glo11@cvtatigers.com
Site # 2 Location Name & Physical Address: 701 Adkin Street Kinston, NC	Days/Hours of Operation: 7:30am -6:00pm	Phone #: 252 939-1958	Site Director Name and Email Address: Michelle Atkinson matkinson@cvtatigers.com
Site # 3 Location Name & Physical Address: 811 Washington Street Kinston, NC	Days/Hours of Operation: 1pm-6pm	Phone #: 252 939-1958	Site Director Name and Email Address: Shakethis Hill Shill1@cvtatigers.com
Site #4 Location Name & Physical Address: 895 Washington Street Kinston, NC	Days/Hours of Operation: 1pm – 6pm	Phone #: 252 939-1958	Site Director Name and Email Address: TBD
Site #5 Location Name & Physical Address: 1401 Old Snow Hill Road Kinston, NC	Days/Hours of Operation: 1pm – 6pm	Phone #: 252 939-1958	Site Director Name and Email Address: TBD

Insert additional cells as necessary.

and updated contact information for all 21ST CCLC FY23 Competitive Summer Mini-Grant Program sites with ACIP; 2) ensure adherence to all assurances and certifications associated with the 21ST CCLC FY23 Competitive Summer Mini-Grant Program; 3) assume responsibility for the reconciliation of any audit exception or compliance finding, including as necessary, the repayment of 21ST CCLC FY23 Competitive Summer Mini-Grant funds from a non-federal funding source. (Note, an original, hand-written signature or official electronic signature is required.)

Melba Lovick
 Printed Name of Fiscal Agent Chief Administrator or Designee

 Signature of Fiscal Agent Chief Administrator or Designee

2/2/23
 Date
 2/2/23
 Date

FY23 SMG Program Monitoring Letter sent on May 22, 2023





NORTH CAROLINA DEPARTMENT OF PUBLIC INSTRUCTION

Catherine Truitt, Superintendent of Public Instruction

www.dpi.nc.gov

TO Dr. Carmelita Grady, Program Director
Children's Village Academy
Unit # 54A

FROM Dr. LaTricia Townsend, Director 
Federal Program Monitoring and Support Division

Mrs. Susan B. Brigman, Section Chief - Specialty Programs 
Federal Program Monitoring and Support Division

DATE May 22, 2023

21st Century Community Learning Centers FY23 Summer Mini-Grant Comprehensive Program Monitoring Review (CPMR) Notification Letter

Please be informed that a 21st CCLC FY23 Summer Mini-Grant CPMR will be scheduled for your program between June 22, 2023 – August 11, 2023. At least two weeks prior to the on-site visit, a North Carolina Department of Public Instruction (NCDPI) Program Administrator (PA) will follow-up with you with additional scheduling information to help you prepare.

Site visits will be conducted during the program's operating hours when the PA will observe the daily programming and instruction. The PA will ensure programs are operated with fidelity to the funded grant proposal using a Comprehensive Program Monitoring Review (CPMR) Assessment Tool. Strands will include Program Management, Program Implementation, and Federal, State, and Local Statutes. The visits may involve interviews with some or all of the following stakeholder groups (as determined by your PA): staff, students, and school administration, as available on the day of the visit. The CPMR will conclude with an exit conference with the Program Director and / or other appropriate program designees to discuss preliminary observations. The CPMR Assessment Tool will be issued to the 21st CCLC Program within 10 days of the exit conference.

The Lead Program Administrator (PA) for your review is Wendy Buck and can be contacted at wendy.buck@dpi.nc.gov. All communication regarding your 21st CCLC Summer Mini-Grant CPMR should be referred to your Lead PA who will contact your Program Director to finalize the details of the monitoring review. Thank you for your support in meeting the needs of students served by these programs.

LT:SB:ms

c: Wendy Buck, NCDPI Lead Program Administrator

FEDERAL PROGRAM MONITORING AND SUPPORT DIVISION

4307 Mail Service Center, Raleigh, North Carolina 27699-6307 | (984) 236-2786 | Fax (984) 236-2099
AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER



**21ST CCLC FY23 Competitive Summer Mini-Grant (SMG)
BASIC PROGRAM INFORMATION**
Competitive Grant Program 2023



**Revised Basic
Program
Information
Sheet
5/23/23 New
Dates
6/26/23-
7/28/23**

I. Basic Information of Organization Applying for 21 st CCLC FY23 Competitive SMG Funding	
Fiscal Agent Organization Name:	Children's Village Academy
Fiscal Agent Organization Unit Number #:	54A
Fiscal Agent Organization Dunn & Bradstreet #:	009793894
Fiscal Agent Organization Tax ID #:	58-1991787
Fiscal Agent Organization Physical Address:	701 N. Adkin Street, Kinston, NC 28501
Requested Grant Award:	\$299,000.00
County(ies) Served by Proposed 21 st CCLC SMG:	Lenoir, Pitt, Greene
Fiscal Agent Chief Administrator Name:	Jessica Jones
Fiscal Agent Chief Administrator Email Address:	Jjones21@cvaligars.com
Fiscal Agent Chief Administrator Phone Number:	252-939-1958
Chief Finance Office Name (if appropriate):	Melba Lovick
Chief Finance Office Email (if appropriate):	kllovick@yahoo.com
Chief Finance Office Phone (if appropriate):	252-521-0006
If submitting a Joint Application, provide name of Partnering Agency:	n/a

II. Other Summer Federal Funding Sources (if applicable)	
If your organization is receiving other federal funds to support the implementation of summer programs between April 12 – September 1, 2023, please indicate the other federal grant sources below:	
<input checked="" type="checkbox"/> 21 st CCLC Cohort 14, 15, 16	<input type="checkbox"/> FY22 ELISS
<input type="checkbox"/> Other (please type in):	<input type="checkbox"/> ESSER 176
	<input type="checkbox"/> ESSER 177
	<input type="checkbox"/> Not Applicable

III. Basic Information of 21 st CCLC FY23 Competitive SMG Program Components			
21 st CCLC FY23 SMG Program Name:	Project MAP		
SMG Program Director Name:	Carmelita Grady		
SMG Program Director Email:	carmelitagrady@yahoo.com		
SMG Program Director Phone Number:	202-299-7853		
FY23 Competitive SMG Program:	Number of Student Slots:	Dates of Programming From:	Total Number of Weeks Students Served:
	120	6/26/23 to 7/28/23	5

III. 21 st CCLC FY23 COMPETITIVE SMG PROGRAM SITE/CENTER INFORMATION (complete for each site/center):			
Site # 1 Location Name & Physical Address: 404 Dixon Street, Kinston, NC 28501	Days/Hours of Operation: M-F 7am – 5pm	Phone #: 252-520-4536	Site Director Name and Email Address: Glora Carr-Batte
Site # 2 Location Name & Physical Address: 805 E. Washington Ave., Kinston, NC 28501	Days/Hours of Operation: M-F 7am – 5pm	Phone #: 252-939-1958	Site Director Name and Email Address: LITERACY LAB
Site # 3 Location Name & Physical Address: 811 E. Washington Ave., Kinston, NC 28501	Days/Hours of Operation: M-F 7am – 5pm	Phone #: 252-938-1958	Site Director Name and Email Address: MATH LAB

Insert additional cells as necessary.

By signing below, I am attesting that I understand it is the Fiscal Agent Organization's responsibility to: 1) maintain accurate and updated contact information for all 21st CCLC FY23 Competitive Summer Mini-Grant Program sites with ACDPI; 2) ensure adherence to all assurances and certifications associated with the 21st CCLC FY23 Competitive Summer Mini-Grant Program; 3) ensure responsibility for the reconciliation of any audit exception or compliance finding, including as necessary, the repayment of 21st CCLC FY23 Competitive Summer Mini-Grant funds from a non-federal funding source. (Note, an original, hand-written signature or official electronic signature is required.)

Melba Lovick

Printed Name of Fiscal Agent Chief Administrator or Designee

Melba Lovick
Signature of Fiscal Agent Chief Administrator or Designee

5/23/2023
Date

5/23/2023
Date

CPMR FY23 SMG Timeline

- The summer programming dates for Cohort 15 were set for 7/2/23-8/4/23 as of the Basic Program Information Sheet that was in CCIP as the most updated information when monitoring schedules were planned.
- The summer programming dates for FY23 SMG were changed as previously illustrated from 7/17/23-8/18/23 as approved by the state board, to 6/26/23-7/28/23 as of 5/23/24 without any amendment or approval.

FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues

- To make any changes such as date changes and grant detail changes it is required for a program amendment to be completed and approved. No amendments were completed or approved.
- The date for the program monitoring had to be changed from 8/3/23 to 7/27 /23 due to the unauthorized change in program dates for the SMG.

FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues

- On the day of the program visit (7/27/23) there was not sufficient documentation to show compliance in several areas.
- A Google drive was set up with a deadline of 7/31/23 for additional documentation to be uploaded to establish program compliance.

FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues



Drive

Program Documentation

Name ↓	Last mo... ▼	File size
54A Parent Handbook (Student Conduct, Transportation Policies)	Jul 27, 2023	—
54A Orientation (Sign In Agenda PowerPoint)	Jul 27, 2023	—
54A Lesson Plans	Jul 27, 2023	—
54A Field Trips Permission Slips	Jul 27, 2023	—
54A Enrollment Forms	Jul 28, 2023	—
54A Criminal Background Checks	Jul 27, 2023	—
54A Attendance Spreadsheets	Jul 27, 2023	—

Findings:

Strand 1, Indicator 1.2- Program implementation (including proposed number of weeks and daily hours) is in alignment with approved application, including competitive priority points, or most recently approved programmatic amendment.

Finding(s): The 21st CCLC SMG program did not provide sufficient evidence to demonstrate full compliance with Indicator 1.2.

Actions Required:

1. The 21st CCLC Program must submit to the North Carolina Department of Public Instruction (NCDPI) a policy/procedure to ensure that no programmatic changes are made without prior approval with a program amendment in NCCIP in the future.
2. The 21st CCLC Program must submit to NCDPI in 21DC the attendance for the Cohort 15 summer program immediately so that separate attendees for the SMG can be substantiated.

Strand 1, Indicator 1.3- Program consistently serves projected number of students according to the description in the approved project.

Finding(s): The 21st CCLC SMG program did not provide sufficient evidence to demonstrate full compliance with Indicator 1.3

Actions Required:

1. The 21st CCLC Program must submit to NCDPI in 21DC the attendance for the Cohort 15 summer program immediately so that separate attendees for the SMG can be substantiated.
2. The 21st CCLC Program must submit to NCDPI copies of student attendance sign in/sign out sheets for one week of programming for FY23 SMG attendees.

FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues

The following findings from the Program Monitoring visit and subsequent Google drive document additions were identified in the monitoring report.

Strand 2, Indicator 2.3- Program monitors student progress to ensure that activities are expected to improve student academic achievement as well as overall student success.

Finding(s): The 21st CCLC SMG program did not provide sufficient evidence to demonstrate full compliance with Indicator 2.3

Actions Required:

1. The 21st CCLC Program must create and submit to NCDPI pre/post data assessment for FY23 SMG showing both academic and SEL progress and submit a data collection plan showing the timeline, type of data that was collected, the communication plan to share data with all stakeholders, and the 21st CCLC SMG staff member responsible for collecting and communicating the data.

Strand 3, Indicator 3.1- Program implements procedures to ensure student and staff safety. Arrival, transition, and departure safety (including field trips)

- Emergency preparedness
- Internet usage
- Student conduct

Finding(s): The 21st CCLC SMG program did not provide sufficient evidence to demonstrate full compliance with Indicator 3.1

Actions Required:

1. The 21st CCLC Program must obtain and submit to NCDPI updated (within the last 12 months) criminal background checks for all FY23 SMG personnel.
2. The 21st CCLC SMG Program must submit to NCDPI sign in sheets from the SMG Staff Orientation Training.

Strand 3, Indicator 3.3 Program has received NCDPI-approval for field trips and is implementing pre/post activities as approved on the official field trip request form.

Finding(s): The 21st CCLC SMG program did not provide sufficient evidence to demonstrate full compliance with Indicator 3.3.

Actions Required

1. The 21st CCLC Program must submit to NCDPI evidence of completed pre and post field trip activities for at least 2 field trips taken during FY23 21st CCLC SMG programming.

Documentation must be received within ten business days of receiving the report.

FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues

- Screenshot of FY23 SMG CPMR Monitoring Instrument 1.2 indicating a finding.

1.2	<p>Program implementation (including proposed number of weeks and daily hours) is in alignment with approved application, including competitive priority points, or most recently approved programmatic amendment.</p>	<p><u>Documentation Reviewed</u> Schedules for weeks 1-4 Basic Program Information Sheet- Changed program hours without a program amendment. There is no way to substantiate separate attendees for Cohort 15 summer program and FY23 SMG attendees due to no information being input into 21DC as of 8/14/23. Grantee was reminded at the site visit on July 27, 2023 to input Cohort 15 summer attendance.</p> <p><u>Interview Information</u> Subgrantee indicated that adjustments had to be made once they received the SMG to accommodate Cohort 15 summer program and their SMG summer program. Programming Dates for SMG: 6/26-7/28 Programming Dates for Cohort 15 Summer Program: 6/12-7/14 (Overlap of 3 weeks (June 28th – July 14th))</p> <p>Subgrantee indicated that due to the overlap in weeks between the two summer programs, they needed to hire staff outside of CVA to run the SMG program, while CVA staff ran the Cohort 15 program.</p> <p>Subgrantee did not submit a Program Amendment for the change in dates.</p> <p>Overlapped staff: Dr. Grady, Ms. Gloria Carr, Ms. Michele Atkinson (no longer employed)</p>	<p><input type="checkbox"/> Meets Requirements <input type="checkbox"/> Meets Requirements with Recommendation(s) <input checked="" type="checkbox"/> Finding(s)</p>
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FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues

- Screenshot of FY23 SMG CPMR Monitoring Instrument 1.3 indicating a finding.

1.3	Program consistently serves projected number of students according to the description in the approved project.	<p><u>Documentation Reviewed</u> Attendance data reviewed showed 87 students enrolled for the week of July 17th with 49 <u>present</u> on July 17th. There is no way to substantiate the attendance via sign-in or sign-out sheets or comparing cohort 15 summer program with FY23 SMG attendees due to no information being provided in 21DC as of 8/14/23. <u>Grantee</u> was reminded to complete 21DC attendance data on July 27, <u>2023</u> during the site visit. 4 enrollment forms for FY23 SMG submitted as evidence in the <u>Google Drive</u> after the site visit.</p> <p><u>Interview Information</u> Per subgrantee, they served the projected number of students listed in the SBE approved application. (120 students) However, PA only substantiated approximately 30 in attendance via observation.</p>	<input type="checkbox"/> Meets Requirements <input type="checkbox"/> Meets Requirements with Recommendation(s) <input checked="" type="checkbox"/> Finding(s)
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On Oct 25, 2023, at 10:06 AM, Wendy Buck <Wendy.Buck@dpi.nc.gov> wrote:

Dear 21st CCLC Subgrantee,

This correspondence acknowledges the receipt of your program's response to the Finding(s) as documented in the [CPMR/FMR] Report from the onsite review of your 21st Century Community Learning Centers (21st CCLC) program on July 27, 2023.

The information provided in your program response resulted in the following action:

The data submitted sufficiently addresses the compliance concerns communicated in the report, and a closing letter will be issued indicating that your program is currently in good standing.

Additional documentation is required (see comments below). Provide the requested documentation within ten (10) business days of receipt of this email to demonstrate compliance and to avoid any possible punitive action against your program including the disablement of funds. Send the information to me via email and copy to Program Assistant Melba Strickland at melba.strickland@dpi.nc.gov.

Strand 1, Indicator 1.2 and Indicator 1.3, Required actions included-

The 21st CCLC Program must submit to NCDPI in 21DC the attendance for the Cohort 15 summer program immediately so that separate attendees for the SMG can be substantiated.-

Some students were counted as present in both Cohort 15 and SMG summer programs on the same day. This overlap in student attendance will cause the scope of the monitoring to expand and additional documentation may be requested due to discrepancies/overlap in student attendance.

Email from September 16th only included student lists for SMG by grade. Please provide any additional evidence such as sign in/sign out sheets with signatures of students/parents that substantiates which students attended the FY23 SMG program during overlapping program weeks with your Cohort 15 21st CCLC grant.

In the October 11, 2023 email, attendance information was shared from the weeks of 7/10/23, 7/3/23, 6/26/23 for both the Cohort 15 summer program and FY23 SMG program. Please provide any additional evidence such as sign in/sign out sheets with signatures of students/parents that substantiates which students attended the FY23 SMG program during overlapping program weeks with your Cohort 15 21st CCLC grant.

FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues

Email 10/25/23 to 54A Dr. Carmelita Grady concerning additional documentation

FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues



Carmelita Grady <carmelitagrady@gmail.com>



To: Melba Strickland; Wendy Buck

Wed 11/8/2023 8:05 PM

CAUTION: External email. Do not click links or open attachments unless verified.
Send all suspicious email as an attachment to [Report Spam](#).

Strand 1, Indicator 1.2 and 1.3

I have provided all the information available. Signatures of parents/students were not collected during the Summer Mini.

FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues

- Screenshot of FY23 SMG CPMR Monitoring Instrument 3.1 indicating a finding.

Strand III: Federal, State, and Local Statutes							
21 st CCLC programs must adhere to all applicable federal, state, and local health, safety, and civil rights laws. (Section 4204(b)(2)(N); Section 4204(c); Section 8501(a)-(d))							
Sample Evidences:							
Written Emergency Preparedness Plans & Safety Drill Documentation	Student and Family Handbooks	Sample Field Trip Approval & Family Permission Forms	Building Inspection and Maintenance Records	Criminal Background Checks	Acceptable Internet Usage Policies and Agreements	Student Sign-In, Dismissal, and Transportation Records	Student Code of Conduct & Sample Student Success Plan
Indicator	Description	Comments					Final Rating
3.1	<p><u>Program</u> implements procedures to ensure student and staff safety.</p> <p>Arrival, transition, and departure safety (including field trips)</p> <ul style="list-style-type: none"> • Emergency preparedness • Internet usage • Student conduct 	<p><u>Documentation Reviewed</u> Handbooks for student conduct, internet, transportation, and addendum to handbook for SMG. Parent memo with information. 8 teacher acknowledgements of receipt of handbook 10 parent acknowledgements of receipt of handbook Criminal Background Checks 1 from 2018, 2 from 2019, 1 from 2021, 1 from 2022. None of the background checks corresponded with employees interviewed. Background checks were not available on site. They were uploaded in the Google Drive after the site visit.</p> <p><u>Interview Information</u> Subgrantee indicated that they have an extensive safety manual and staff are trained and required to implement the policies and procedures.</p> <p>Subgrantee indicated that teachers attended an orientation, which included training on Safety. Subgrantee is unsure if they must sign for the manual, but that they are required to sign in for the orientation as evidence of attending the orientation. No sign in sheets were provided as evidence of the orientation taking place.</p> <p>Subgrantee teacher interview indicated she was unable to attend the orientation due to a prior commitment.</p> <p>Subgrantee indicated that each staff member has a maximum of 20 children assigned and are instructed to have students use the buddy system when transitioning between places.</p> <p>The Subgrantee Program Director indicated they had not completed safety drills, but the subgrantee Site Coordinator indicated they had and would send the Drill Log for evidence.</p> <p>Subgrantee indicated they have an Internet Usage Policy signed by student and parents. Subgrantee indicated they can pull reports from the server to monitor access to unapproved sites.</p>					<input type="checkbox"/> Meets Requirements <input type="checkbox"/> Meets Requirements with <input type="checkbox"/> Recommendation(s) <input checked="" type="checkbox"/> Finding(s)

FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues

7.B: Criminal Background Check Policies and Procedures

Organizations awarded the 21st CCLC FY23 Competitive Summer Mini-Grant must certify all employees, direct-service contractors, and volunteers who work with the program have approved criminal background checks on file prior to their work with the program. In accordance with State 21st CCLC FY23 Competitive Summer Mini-Grant guidelines, the organization's procedure regarding criminal background checks must meet the following requirements:

1. Must comply with the criminal background check policy and personnel procedures of the program feeder schools' district(s) [district is also referred to as the Local Education Agency (LEA)], or that of the subgrantee's governing board.
2. In the absence of an LEA or subgrantee's governing board policy, the subgrantee must obtain background checks that meet the following criteria at a minimum:
 - Criminal background checks are run against national and state criminal databases, and must include the [North Carolina Sex Offender Database](#) and the [National Sex Offender Database](#).
 - Criminal record checks must be completed and cleared for all new or existing employees, volunteers, or contractors prior to their interaction with children or handling of 21st CCLC funds. All criminal background checks from program employees are considered expired by NCDPI at the end of the grant cycle.
 - Statewide criminal background checks must include all states in which the employee or volunteer lives or has lived for the previous five (5) years.
 - All criminal background checks must be obtained directly and kept on file by the subgrantee; background checks obtained/submitted by employees are not acceptable. The subgrantee maintains responsibility to ensure that the background check data is accurate and current.
 - All criminal background checks must include the following:
 - Date criminal history check was obtained;
 - Name of agency that completed criminal history check;
 - Name or identity code of the person who ran the background check; and
 - Results of the criminal history check (i.e., "no record," "record attached," etc.).

FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues

Indicator 3.1 Background Checks

From: Wendy Buck <Wendy.Buck@dpi.nc.gov>
Sent: Thursday, November 9, 2023 11:13:36 AM
To: Monica Pask <Monica.Pask@dpi.nc.gov>; Ashton Moss <Ashton.Moss@dpi.nc.gov>
Cc: Susan Brigman <Susan.Brigman@dpi.nc.gov>
Subject: Re: 54A

Just an FYI.

The people that we interviewed for the SMG monitoring were:

Megan Brock 9/7/23
Rhonda Olds- background check dated 8/19/21 and 8/31/23
Barbara Simpson 8/28/23
Gloria Battle 8/31/23
Diamond Joachain- 11/27/2018 which is clearly not within the 3 year window and 8/31/23

In the latest round of correspondence (11.8.23) only 2 of those have we seen a background check prior to the 2023 ones we received. The other 3 we interviewed for SMG we have no evidence of a background check prior to 2023.

FY23 21st CCLC Summer Mini Grant Programmatic Compliance Issues

- The findings from FY23 SMG Program Monitoring for Indicators 1.2, 1.3 and 3.1 have been unable to be resolved after correspondence requesting additional documentation dated 8/14/23 from the initial report and findings letter and follow-up emails requesting and receiving additional documentation on 9/6/23, 9/28/23, and 10/25.

FY23 21st CCLC SMG – Fiscal Timeline

- Fiscal Review of 2023 SMG commenced the week of September 18th, 2023
- Initial review was of July 2023 expenditures only
- Follow-up letter #1 sent on October 16th, 2023
- Follow-up letter #2 sent on November 14th, 2023
- Findings with Questioned Costs letter – December 1st, 2023; \$287,027.52
- Payment/Additional Documentation Due – December 14th, 2023

FY23 21st CCLC SMG – Fiscal Compliance Issues

- 7 Findings, including:
- Questioned Costs - \$287,028.
 - Time & Effort Documentation
 - Supplanting Cohort 15 and CVA Charter School operations with SMG funds
 - Unapproved Contracts / Conflict of Interest Concerns
 - Unallowable Costs and Expenditures Not Adequately Documented
- Failure to establish and maintain effective internal control over the Federal award.

FINDING #1: Insufficient and Inconsistent Time & Effort Documentation

- Allocability of payroll expenditures to SMG (vs Cohort 15 vs CVA Charter).
- Excessive Salaries:
 - Custodial Services: \$29,107.17 for SMG, including:
 - Custodian receiving over \$17k in Gross wages for the period JUL- SEPT
 - Custodian/Driver receiving over \$15k in Gross wages for JUL-AUG
- IN/OUT times reported on timesheets do not compute to the total hours reported for the day.
- IN/OUT times are reported in odd minutes, and the odd minutes are repeated from employee to employee, which undermines the veracity of the timesheets.

FINDING #2: Contracted Services and Conflict of Interest Concerns

- 7 unapproved contracts (required to be uploaded into CCIP for approval)
- Three related party transactions with red flag indicators
 - Individuals not vendors/suppliers of the items invoiced
 - Invoiced for the same supplies and materials, using the same item numbers
 - **Invoice #1:** 200 t-shirts, 150 backpacks with supplies, telescopes, LEGO, Arcade basketball game, Kites, Franklin Mini Hockey, VEX Robotics
 - **Invoice #2:** 200 t-shirts, 150 backpacks with supplies
 - **Invoice #3:** telescopes, LEGO, Arcade basketball game, Kites, Franklin Mini Hockey, VEX Robotics
- Potential other COI concerns

100 SMG students

FINDING #3: Supplanting Cohort 15 and CVA Charter operations with SMG funds

- Programming Dates for SMG: June 26th – July 28th, 2023
- The allocability of Salaries and Wages charged to the SMG is also in question

Vendor/Supplier	Amount	Description
Varsity Tutors for Schools LLC	\$42,120	Contract Dates: 7/1/2023 - 6/30/2024 No consumption in July 2023 (per Varsity Tutors)
Curriculum Associates	\$10,493	Order Date: 7/31/2023
Hand2Mind	\$12,919	Pro Forma Invoice, Customer PO: 2024
Nearpod	\$2,990	Subscription Dates: 11/16/2023-11/15/2024
Studies Weekly	\$3,219	Invoice Date: 7/20/2023
Bender-Burkot, Staples	\$4,562	Order Dates: 7/29/2023, 8/1/2023
School Specialty	\$850	Delivery Date: 7/21/2023

FINDING #4: Unallowable Costs. Expenditures Not Adequately Documented.

Vendor/Supplier	Amount	Description
Lawing Romero	\$6,600	<ul style="list-style-type: none"> renovate (8) bathroom stalls construction projects are unallowable
<ul style="list-style-type: none"> EE reimbursements Envision Excellence CDS Networks 	\$5,356	<ul style="list-style-type: none"> Purchases after SMG dates of programming Program Director's contract for Coh 15, which is under review for Year 3 (FY24) Services provided to Wonderland Daycare
Canon Financial Services	\$934	<ul style="list-style-type: none"> late fees on three Canon invoices
Best Buy (8/15/23 Delivery)	\$769	<ul style="list-style-type: none"> 65" TCL Roku TV and Stand not budgeted or inventoried
Family Dollar (7/20/2023)	\$315	<ul style="list-style-type: none"> AXE body sprays, Febreze, Gain detergent and dryer sheets, SHOUT, toothpaste, dish detergent
Staples	<u>\$12,937</u>	<ul style="list-style-type: none"> inadequate / questionable documentation
	\$26,911	

FINDINGS #5-7: Failure to establish and maintain effective internal control over the Federal Award.

- Absence of strong policies and procedures in place, with limited oversight by the CVA Board of Directors.
- Concerns with the FO's ability to determine allowability and allocability.
- FO has the authority to both approve and pay invoices.
- Use of a signature stamp to process check payments.
- Timesheets signed by FO versus an immediate supervisor.
- Documentation indicates no evidence of a requisition/purchasing and approval process.
- The 21st CCLC Program Director is a contracted staff member based out of Washington DC and has the authority to select "vendors", make purchasing decisions, and submit invoices for payment.

FINDINGS #5-7: Failure to establish and maintain effective internal control over the Federal Award (cont'd.).

- COA codes do not align with the type of purchase. (Example: \$42k contract with Varsity Tutors was charged to Supplies.)
- Failure to submit a Budget Amendment 209 for COA codes with insufficient budget. (Example: Salaries - Custodial Services is 200% over budget; \$9.6k budget vs \$29.1k actual)
- Failure to get Budget 208 approval for all furniture and equipment purchases.
- Failure to maintain accurate property records (Inventory Listing) of all furniture, equipment, including TV's and computing devices purchased using 21st CCLC grant funds.
- Failure to get pre-approval for all vendor contracts, leading to at least 3 related party transactions with significant red flag indicators and undisclosed Conflicts of Interest.

54A CVA 21st CCLC – HISTORICAL PERSPECTIVE

PRC 110	thru Per 9				thru Per 4				Total
	FY17	FY18	FY19	FY20	FY21	FY22	FY23	FY24	
Budget	257,842	580,000	805,845	645,083	824,331	662,189	571,000	299,000	4,645,291
FYTD Exp	257,842	574,155	704,762	612,036	562,142	662,189	272,000	333,712	3,978,838
Amt Reviewed	Unk	Unk	Unk	53,439	59,826	114,318	70,110	320,827	618,521
Quest Costs	Unk	Unk	Unk	34,089	24,319	52,267	-	287,028	397,703
Percent				63.8%	40.6%	45.7%	0.0%	89.5%	64.3%
Findings				A - E	A D E	B E, F-H	D F H	A-H	

Key For Findings

- A Missing T&E
- B Supplanting CVA operations with 21st CCLC grant funds
- C Excessive Custodial Staff Wages Allocated to 21st CCLC
- D Missing Authorizations
- E Unallowable Costs (Charging Late Fees on Copiers, Missing Receipts)
- F Incorrect/Unapproved COA codes
- G Over Budgeted line-items (209 Budget Amendment not submitted)
- H Unapproved Contracts; Payments Not Adhering to Terms of Contract

21st CCLC Grants Awarded:
Cohort 11, Cohort 12, Cohort 13, Cohort 15, SMG 2021, SMG 2023

FY23 21st CCLC FISCAL REVIEW – CURRENT STATUS

- All Findings and Questioned Cost were communicated to CVA via letter sent Friday, December 1, 2023.
- All responses and/or repayment of Questioned Cost (\$287,027.52) are due on or before Thursday, December 14, 2023.
- LEA must not request additional funds for PRC 110 until Questioned Costs are resolved.

Office of Federal Programs Next Steps

- OFP is awaiting a final response on December 14th for the fiscal findings.
- OFP was unable to resolve 3 of the programmatic findings.
- OFP Leadership is discussing possible termination of 21st CCLC grant funding pending the receipt of final fiscal documentation.

Reasons for Termination

- Pursuant to the 2023 21st CCLC Grant Guidance Section 1.G.4, NCDPI reserves the right to terminate a subgrantee's 21st CCLC grant award at any time during the active grant cycle. NCDPI may terminate a grant prior to first installments of funding, during the active grant period, or prior to a continuation application approval. Reasons for termination may include, but are not limited to:
 1. Excessive questioned costs
 2. Failure to demonstrate safe and effective learning environments (Sec 4204(b) and Sec 4204(c), TITLE IV, PART B — 21st Century Community Learning Centers)
 3. Failure to meet program goals
 4. Low average daily attendance (ADA) (i.e., less than 70% of enrolled students attending on a daily basis) (CVA's ADA for Cohort 15 = 53% and CVA did not receive 3rd installment as they failed to meet the 75% enrollment goal.)
 5. Failure to close programmatic and/or fiscal findings within 30-business days
 6. Misuse of federal funds

Questions?

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