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2018-19 1003(g) School Improvement Grant Risk Analysis Process*

Federal guidance on School Improvement Grants (SIG) under Section 1003(g) requires State Education Agencies (SEA)s to monitor the implementation of SIG-funded models in order to ensure that the requirements of each model are being met and to ensure that funds are being used in a way that meets the “intent and purpose of the grant and in a way that is necessary and reasonable.”

Based on the limited time and resources available at the New York State Education Department, it is necessary to create a Risk Analysis Process for monitoring the implementation of SIG to determine how to expend the available resources to maximize student achievement gains in SIG-funded schools and minimize the risk of misuse of funds.

The following factors, in the order provided, are used to determine the depth and frequency of monitoring that any one SIG-funded school may receive.

Risk Factor	Performance Management Interventions					
	Quarterly Reporting Submitted by LEA 4 times per year	Bi-annual Reporting Submitted by LEA 2 times per year	Quarterly Progress Review Conference Calls with LEA Central Office Staff and school principals	Call Follow-up Report Sent by SEA Staff	On-site Visits Conducted by SEA Staff	Follow-up Site Visit Report Sent by SEA Staff
1. SIG-funded Schools that are also designated as Persistently Struggling under Education Law 211(f) http://www.p12.nysed.gov	√		√	√ As needed	√ 1-2 times per year	√ As needed

* The risk analysis procedure is updated yearly during the month of August, prior to the start of a new school year, as accountability designations and numbers of schools in each category in the Office of Innovation and School Reform (OISR) portfolio are determined.

Risk Factor	Performance Management Interventions					
	Quarterly Reporting Submitted by LEA 4 times per year	Bi-annual Reporting Submitted by LEA 2 times per year	Quarterly Progress Review Conference Calls with LEA Central Office Staff and school principals	Call Follow-up Report Sent by SEA Staff	On-site Visits Conducted by SEA Staff	Follow-up Site Visit Report Sent by SEA Staff
/accountability/de/documents/SUBPARTHfinal.pdf						
2. SIG-funded Schools that are also designated as Struggling under Education Law 211(f)	√		√	√ As needed	√ 1 time per year	√ As needed
3. SIG-funded schools that remain in Comprehensive Support and Improvement status in later fund years - Cohorts 5, 6, and 7, along with a review of their NYS assessment data with the lowest performing of these schools getting priority.		√			A sample of SIG Cohort 5, 6 and 7 schools will be visited, based on NYS Assessment data	As needed if there are follow-up items.
4. SIG-funded schools that are no longer in in Comprehensive Support and Improvement status in Cohorts 5, 6, and 7.		√			A sample of SIG Cohort 5, 6, and 7 schools will be visited	As needed if there are follow-up items.

The following procedures are in place to take enforcement action against sub-recipients that do not comply with corrective actions resulting from monitoring activities:

- Evidence gathered from site visits and quarterly report calls discussing the SIG budget and plans provide OISR staff with a portfolio of evidence to determine compliance with the use of their SIG award. All SIG award letters to Superintendents indicate NYSED's right to recoup funds of SIG dollars, if compliance is not met.
- The school leadership team of the non-compliant school is informed in writing of the SIG federal requirement that they are not in compliance with, and the district superintendent is copied. OISR liaisons keep records of the school and district corrective actions to get into compliance.
- If written communication regarding what needs to happen to get into compliance is not followed, OISR liaisons communicate with OISR senior management, and senior management contacts district leadership. SIG funds are recouped in accordance.