### **HSSSP Compliance and Monitoring Guidelines**

The High School Student Services Support Program (HSSSP) compliance and monitoring plan ensures responsible fund management and program effectiveness by aligning with established goals. This plan provides a framework for adhering to relevant policies, outlining responsibilities, establishing reporting requirements, and an approach to address potential issues. Supported Organizations (SOs) must adhere to the compliance and monitoring requirements. Failure to do so may result in a program audit, repayment of funds, and affect future funding opportunities.

By implementing compliance standards and proactively monitoring activities, PDF aims to prevent issues, ensure responsible fund use and management, and maintain program alignment with requirements.

#### Framework

The framework for the plan integrates <u>compliance standards</u>, <u>monitoring activities</u>, <u>remediation strategies</u>, and <u>technical assistance</u>. This structure is designed to ensure SOs are well-informed and equipped to adhere to program guidelines and requirements, ultimately leading to impactful program delivery.

### **Compliance Standards**

The HSSSP funds organizations that provide services to Denver residents and low-income students to increase postsecondary preparedness and enrollment. To ensure SOs understand the program, spend down funds within the same year, and are using funds in accordance with the ordinance and PDF Board policies, PDF has established financial, program, and engagement compliance areas.

**Financial:** SOs are expected to demonstrate fiscal responsibility by keeping accurate and detailed records of all expenditures, including supporting documentation, which must be readily accessible for review at any time and submitted annually. Funds are to be utilized solely for expenses directly related to eligible HSSSP students and program components, ensuring alignment with program goals. All reimbursement funds are expected to be spent within the same year (application and disbursement). Timely and precise financial reports, detailing expenditures and explaining any variances, are mandatory to maintain transparency and accountability.

**Program:** To ensure program success, service delivery must adhere to the six core program components and any approved novel or innovative services. The program must support high school students who are Denver residents (at least 75%) and demonstrate financial need. Accurate data collection and maintenance are essential. A program report must be submitted

annually detailing the populations served, services and program component alignment, and how the funds supported the SO in growing reach and impact.

**Engagement:** SOs are required to maintain open and consistent communication with PDF staff, promptly responding to inquiries and notifying them of any significant program or staffing changes. SOs must also fully cooperate with PDF during scheduled check-in meetings, providing necessary access to records, facilities, and staff. Finally, SOs are required to complete an annual renewal.

### **Monitoring**

The monitoring plan outlines the methods by which PDF will ensure accountability within the HSSSP program, maximizing its impact on Denver students' postsecondary preparedness and success. PDF will employ a multi-faceted approach, focusing on three key areas: financial reports, program reports, and check-ins. These measures are designed to provide a comprehensive view of program activities, track progress, and verify the responsible use of funds. Through regular reporting and data analysis, PDF aims to foster transparency, promote continuous improvement, and ensure that the funded program effectively supports the HSSSP program goal.

## **Remediation Strategies**

Remediation strategies are plans and actions to address and correct areas where the SOs are encountering compliance and monitoring challenges. They are essential for maintaining program integrity and ensuring continued funding. They involve developing and implementing targeted corrective actions, providing necessary training and support, and enhancing monitoring and oversight. Failure to implement remediation strategies effectively may result in a program audit, repayment of funds, and impact future funding eligibility.

### **Technical Assistance**

PDF will provide extensive technical assistance (TA) to all organizations, offering training, resources, and support to meet HSSSP policies and compliance and monitoring standards. This assistance will be delivered by PDFs in-house team or through a network of experienced partners. PDF will offer regular workshops and webinars covering application procedures, policies, compliance guidelines, and remediation strategies. An online portal will provide easy access to FAQs, templates, reporting items, and essential documents.

Recognizing that some organizations may require additional support to fulfill specific requests related to compliance, monitoring, or reporting, PDF is prepared to explore tailored assistance on a case-by-case basis. This may include funding to secure external technical assistance.

## **Financial Reports**

### **Compliance Standards**

- Reimbursement funds must be spent within the same year as the distribution cycle.
  - Ex. 2025-2026 distribution cycle (reimbursement for the 2024-25 academic year) funds must be spent by July 31, 2026.
  - Ex. 2026-2027 distribution cycle funds must be spent by July 31, 2027.
- SOs must maintain detailed and accurate records of all expenditures related to the use of HSSSP funds, e.g., invoices, receipts, and payroll records.
- Financial documentation will be submitted with the end of year report and must be retained to be readily available for review upon request by PDF.
- All expenditures must be directly related to the provision of eligible HSSSP services.
- Expenses must support high school students, align with the program components, and support the goal
  of increasing postsecondary preparedness and enrollment for low-income Denver residents.

### **Monitoring**

- SOs are expected to complete two financial reports annually.
  - Mid-Year Expenditure Review: Expenditure update in March detailing the progress of spend down.
  - **End of Year Report:** Comprehensive end-of-year report due in July detailing the progress of spend down, submission of documentation and records, and narrative explaining the use of funds.
- SOs must submit complete and timely reports and adhere to the compliance and monitoring requirements.
- PDF will conduct thorough reviews of financial reports to ensure accuracy, completeness, and compliance and will identify and address any necessary remediation.

## **Remediation Strategy**

- SOs will be required to provide explanations and address identified issues.
- Failure to adhere to the requirements outlined may result in the repayment of funds.
- Compliance and monitoring challenges and non-compliance will be shared with the Board and inform future funding opportunities.

## 2024-2025 Distribution Cycle (fall 2024)

### **Mid-Year Expenditure Review**

- SOs may be required to meet with PDF staff if there are concerns with the progress of spend down and/or management of funds.
- A review of financial documentation and records may be required.

## **End of Year Report**

- SOs awarded in the 2024-2025 Distribution Cycle (fall 2024) are expected to expend funds by July 31, 2025.
- PDF may conduct case-by-case reviews for SOs with documented extenuating circumstances and justifiable delays that prevented spending.
- SOs that report any amount of unspent funds must submit a spend down plan by August 30, 2025.
- SOs that submit a spend down plan must spend the remaining funds and complete an additional detailed financial report with supporting documentation accounting for the remaining funds by October 1, 2025.
- Any funds not spent must be returned to PDF by October 27, 2025.
- SOs that do not meet these requirements will not be eligible to apply for the 2025-2026 Distribution Cycle.
- SOs may be required to meet with PDF staff if they have concerns about reporting, the progress of spend down, and/or the management of funds.

## 2025-2026 Distribution Cycle (and all future cycles)

## **Mid-Year Expenditure Review**

- SOs may be required to meet with PDF staff if there are concerns with the progress of spend down and/or management of funds.
- A review of financial documentation and records may be required.

# **End of Year Report**

- If any unspent funds remain from the previous distribution cycle, the SO must return them to PDF by October 1 to be eligible to apply in the next distribution cycle.
- If unspent funds are not received by October 1, the SO is not eligible to apply for funding.
- SOs may be required to meet with PDF staff if they have concerns about reporting, the progress of spend down, and/or the management of funds.

### **Program Reports**

## **Compliance Standards**

- Program activities must be aligned with the goal of increasing postsecondary preparedness and enrollment.
- The program primarily supports high school students who are Denver residents and/or attend a Denver high school (at least 75% of students) and low-income students (at least 50% of students).
- Services align with the six program components and any approved novel/innovative services.
- Collect and maintain accurate data on program participation, outcomes, and impact.

### Monitoring

- SOs will complete one end of year report.
- SOs must submit complete and timely reports and adhere to the compliance and monitoring requirements.
- Comprehensive end of year narrative report due in July detailing the populations served, services and program component alignment, and how the funds supported the SO in growing their reach and impact.
- PDF will conduct thorough reviews of program reports to ensure accuracy, completeness, and compliance and will identify and address any necessary remediation.

### **Remediation Strategies**

- SOs will be required to provide explanations and address identified issues.
- SOs may be required to meet with PDF staff if there are concerns with the services offered, the population served, and/or the alignment with the goals of HSSSP.
- SOs may be required to provide additional program data and reports; these documents must retained and readily available for review upon request by PDF.
- Failure to meet compliance and monitoring requirements may result in the repayment of all funds.
- Compliance and monitoring challenges and non-compliance will be shared with the Board and inform future funding opportunities.

## Engagement

## **Compliance Standards**

- Maintain open and consistent communication with PDF staff and respond to inquiries and requests in a timely manner.
- Notify PDF of any significant changes to program operations or staffing.
- Cooperate with PDF staff during check-in meetings, providing access to staff and records.
- Complete an annual SO Renewal Agreement.

## Monitoring

- SOs must maintain open and consistent communication with PDF staff.
- Respond to inquiries and requests in a timely manner.
- Complete at least one check-in annually.
- Submit an annual renewal in July.
- PDF will conduct thorough reviews of SO engagement and will identify and address any necessary remediation.

## **Remediation Strategy**

- SOs will be required to provide explanations and address identified issues.
- SOs must maintain open and consistent communication with PDF staff, respond to inquiries and requests in a timely manner, and complete at least one check-in annually.
- SOs may be required to meet with PDF staff more often if there are concerns with financial management, programmatic support, and/or disengagement.
- Failure to meet compliance and monitoring requirements may result in the repayment of all funds.
- Compliance and monitoring challenges and non-compliance will be shared with the board and inform future funding opportunities.

# Timeline

To facilitate effective planning and coordination, the key dates and milestones are presented in the following timeline.

2024-2025 Distribution Cycle Timeline		
Activity	Date	
Mid-Year Expenditure Review Due	March 14, 2025	
End of Year Report Released	June 2, 2025	
End of Year Report Webinar	June 2, 2025	
End of Year Report Help Desk Sessions	June 25, 2025, July 9, 2025;	
	July 16, 2025	
Final Expenditure Date	July 31, 2025	
End of Year Report Due	August 30, 2025	
Spend Down (if applicable)		
Spend Down Plan Due	August 30, 2025	
Spend Down Report Due	October 1, 2025	
Spend Down Returned Funds Due	October 27, 2025	

2025-2026 Distribution Cycle Timeline		
Activity	Date	
Mid-Year Expenditure Review Released	February 23, 2026	
Mid-Year Expenditure Review Webinar	February 23, 2026	
Mid-Year Expenditure Review Help Desk Sessions	March 3, 2026; March 10, 2026	
Mid-Year Expenditure Review Due	March 20, 2026	
Mid-Year Check-Ins	Week of March 30, 2026	
End of Year Report Released	June 1, 2026	
End of Year Report Webinar	June 1, 2026	
End of Year Report Help Desk Sessions	June 24, 2026; July 8, 2026' July	
	15, 2026	
Final Expenditure Date	July 31, 2026	
End of Year Report Due	August 30, 2026	
Return of Funds Due	October 1, 2026	