

**Desk Audit Compliance Checklist**  
**Children's Internet Protection Act (CIPA) / E-Rate**  
**Internet Safety Policy and Internet Safety Curriculum**

**District/Charter:** Family Foundations      **Reviewer:** Modzelewski

**Date:** 06/16/14

**Legislation/Regulation Authority:**

OMB CIRCULAR A-133, Cross-Cutting Section Part III.B. A State may adopt its own written fiscal and administrative requirements, which are consistent with the provisions of OMB Circular A-133, Cross-Cutting Section Part III.B. A State may adopt its own written fiscal and administrative requirements, which are consistent with the provisions of OMB Circular A-87, for expending and accounting for all funds received by SEAs and LEAs under ESEA programs. The written fiscal and administrative requirements must: (a) be sufficiently specific to ensure that funds are used in compliance with all applicable statutory and regulatory provisions, including ensuring that costs are allocable to a particular cost objective; (b) ensure that funds received are spent only for reasonable and necessary costs of the program; and (c) ensure that funds are not used for general expenses required to carry out other responsibilities of State or local governments (34 CFR section 299.2(b)).

OMB CIRCULAR A-133, Subpart D Section .400(d)(3) Monitor the activities of subrecipients as necessary to ensure that Federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements and that performance goals are achieved.

FCC regulations implementing CIPA: FCC 01-120

FCC 2011 regulation update: FCC 11-125

CHILDREN'S INTERNET PROTECTION ACT (Pub. L. 106-554)

**Intent of the Legislation/Regulation:**

To certify that federal awards are used for authorized purposes.

**Focus of Review:**

Ensure that proper documentation is on file for approved expenditures.

**Method of Assessment:** (Check all that apply)

- Document Review  
 Observation  
 Interview

Required District and Charter School Compliance – Internet Safety Policy and Internet Safety Curriculum Implementation	Evidence	Compliance		Comments/Corrective Action	Corrective Action Due Date
		Yes	No		
Documentation for Internet Safety Policy and Internet Safety Curriculum SY 2013-2014 are available.	<p>A description and documentation of adherence to the requirements of the Children's Internet Protection Act (CIPA) / E-Rate Internet Safety Policy and Internet Safety Curriculum as follows:</p> <ul style="list-style-type: none"> <li>A Board-approved copy of the LEA's Internet Safety Policy.</li> </ul> <p>Policies are posted at <a href="http://dcet.k12.de.us/instructional/internetsafety/internetSafetyPolicies.shtml">http://dcet.k12.de.us/instructional/internetsafety/internetSafetyPolicies.shtml</a> and may be verified by the LEA.</p> <ul style="list-style-type: none"> <li>Scope and sequence of the lessons being taught, including grade level, as aligned to the three federally required content areas:               <ol style="list-style-type: none"> <li>Safety on the Internet</li> <li>Appropriate behavior while on online, on social networking Web sites, and in chat rooms; and</li> <li>Cyberbullying awareness and response.</li> </ol> </li> </ul> <p>Curriculum Matrix 2013-2014 Sample: (<a href="http://dcet.k12.de.us/instructional/internet_safety/index.shtml">http://dcet.k12.de.us/instructional/internet_safety/index.shtml</a>)</p> <ul style="list-style-type: none"> <li>Documentation (teacher names, dates, lessons taught, etc.) that demonstrates that progress has been made toward implementing the LEA's chosen internet safety curriculum during the 2013-2014 school year.               <ul style="list-style-type: none"> <li>iSAFE Curriculum Users:                   <ul style="list-style-type: none"> <li>this will be reviewed thru iSAFE's administrative portal and no submission is required.</li> </ul> </li> <li>Non-iSAFE Curriculum Users:                   <ul style="list-style-type: none"> <li>documentation should be submitted.</li> </ul> </li> </ul> </li> </ul>	X	N/A	<ul style="list-style-type: none"> <li>Non-responsive to last email from Wendy Modzelewski to Sean Moore; Thu 5/29/2014 4:52 PM</li> </ul>	07/04/14
	<ul style="list-style-type: none"> <li>Scope and sequence of the lessons being taught, including grade level, as aligned to the three federally required content areas:               <ol style="list-style-type: none"> <li>Safety on the Internet</li> <li>Appropriate behavior while on online, on social networking Web sites, and in chat rooms; and</li> <li>Cyberbullying awareness and response.</li> </ol> </li> </ul>	X		<ul style="list-style-type: none"> <li>No submission</li> <li>In order to certify your curriculum implementation, please note acceptable evidence that may be submitted as described in the 2014 eRATE Internet Safety Curriculum Monitoring Documentation.</li> </ul>	07/04/14
	<ul style="list-style-type: none"> <li>Documentation (teacher names, dates, lessons taught, etc.) that demonstrates that progress has been made toward implementing the LEA's chosen internet safety curriculum during the 2013-2014 school year.               <ul style="list-style-type: none"> <li>iSAFE Curriculum Users:                   <ul style="list-style-type: none"> <li>this will be reviewed thru iSAFE's administrative portal and no submission is required.</li> </ul> </li> <li>Non-iSAFE Curriculum Users:                   <ul style="list-style-type: none"> <li>documentation should be submitted.</li> </ul> </li> </ul> </li> </ul>	X		<ul style="list-style-type: none"> <li>No Submission.</li> <li>In order to certify your curriculum implementation, please note acceptable evidence that may be submitted as described in the 2014 eRATE Internet Safety Curriculum Monitoring Documentation.</li> </ul>	07/04/14

**Delaware Department of Education (DDOE) Federal Compliance Monitoring**

**Subject: Children's Internet Protection Act (CIPA) / E-Rate  
Internet Safety Policy and Internet Safety Curriculum**

**Status**  Compliant

Non-Compliant

**INTERIM MONITORING: December 2014**

(Full monitoring will occur again in April 2015)

**Curriculum Option**

OPTION A: iSAFE Curriculum

OPTION B: Combination or Other Curriculum

**LEA:**

**DDOE Reviewer:**

**Program Reviewed:**

**Date of Review:**

**Review Type:**

On-site Review

Desk Audit Review

**Legislation/Regulation Authority:**

OMB CIRCULAR A-133, Cross-Cutting Section Part III.B. A State may adopt its own written fiscal and administrative requirements, which are consistent with the provisions of OMB Circular A-87, for expending and accounting for all funds received by SEAs and LEAs under ESEA programs. The written fiscal and administrative requirements must: (a) be sufficiently specific to ensure that funds are used in compliance with all applicable statutory and regulatory provisions, including ensuring that costs are allocable to a particular cost objective; (b) ensure that funds received are spent only for reasonable and necessary costs of the program; and (c) ensure that funds are not used for general expenses required to carry out other responsibilities of State or local governments (34 CFR section 299.2(b)).

OMB CIRCULAR A-133, Subpart D Section .400(d)(3) Monitor the activities of subrecipients as necessary to ensure that Federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements and that performance goals are achieved.

FCC regulations implementing CIPA: FCC 01-120

FCC 2011 regulation update: FCC 11-125

CHILDREN'S INTERNET PROTECTION ACT (Pub. L. 106-554)

**Focus of Monitoring:**

To certify that federal awards are used for authorized purposes and to ensure that proper documentation is on file for approved expenditures.

Required Federal Compliance Items	Acceptable Evidence	Compliance		Comments/Corrective Action Required/ DDOE Action Taken	Corrective Action Due Date
		Yes	No		
Documentation for Internet Safety Policy and Internet Safety Curriculum SY 2014-2015 are available.	A description and documentation of adherence to the requirements of the Children's Internet Protection Act (CIPA) / E-Rate Internet Safety Policy and Internet Safety Curriculum as follows:  A Board-approved copy of the LEA's Internet Safety Policy.  Policies are posted at <a href="http://dcet.k12.de.us/instructional/internet/safety/InternetSafetyPolicies.shtml">http://dcet.k12.de.us/instructional/internet/safety/InternetSafetyPolicies.shtml</a> and may be verified by the LEA.	X		All LEAs had this document on file as of 7/1/14 and therefore this document will not be collected at this time.	N/A
	<p><b>1. Curriculum Matrix</b></p> <p>Matrix follows the required format and contains a list of the lessons being taught, including grade level, as aligned to the three federally required content areas:</p> <ul style="list-style-type: none"> <li>a. Safety on the Internet</li> <li>b. Appropriate behavior while on online, on social networking Web sites, and in chat rooms; and</li> <li>c. Cyberbullying awareness and response.</li> </ul> <p>Curriculum Matrix format and sample: (<a href="http://dcet.k12.de.us/instructional/internet/safety/index.shtml">http://dcet.k12.de.us/instructional/internet/safety/index.shtml</a>)</p>				

	<p><b>2. Subscription Teachers Action Table (STAT)</b></p> <ul style="list-style-type: none"> <li><b>iSAFE Curriculum Users:</b> The STAT has been completed and submitted AND has been uploaded to iSAFE following the instructions found on the iSAFE Administrative Portal</li> <li><b>Non-iSAFE Curriculum Users:</b> The STAT has been completed and submitted.</li> </ul> <p>STAT: format and sample: (<a href="http://doet.k12.de.us/instructional/internet/safety/index.shtml">http://doet.k12.de.us/instructional/internet/safety/index.shtml</a>)</p>			
	<p><b>3. Sample Curriculum</b></p> <ul style="list-style-type: none"> <li><b>iSAFE Curriculum Users:</b> No curriculum documentation is required.</li> <li><b>Non-iSAFE Curriculum Users:</b> Curriculum documentation has been submitted and aligns to the required contents as indicated in the 2014-2015 eRATE Internet Safety Curriculum Monitoring Documentation Table.</li> </ul>			
	<p><b>4. Rollout Plan</b></p> <p>A rollout plan has been provided (one-page description/table) that encompasses the following:</p> <ul style="list-style-type: none"> <li>List of all grade levels involved</li> <li>Starting timeline for rollout</li> <li>Ending timeline for rollout (Entire curriculum must be taught, certified, and completed no later than April 1, 2015)</li> </ul>			