Compliance Isn't Built in a Day: The Importance of Ongoing Communication in Subgrantee Monitoring

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Introductory Remarks
Simon Gonsoulin
Director, NDTAC

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About NDTAC

- Neglected-Delinquent TA Center (NDTAC)
- Contract between U.S. Department of Education and the American Institutes for Research
  - John McLaughlin
    Federal Coordinator, Title I, Part D, Neglected, Delinquent, or At Risk Program
- NDTAC’s Mission:
  - Develop a uniform evaluation model
  - Provide technical assistance
  - Serve as a facilitator between different organizations, agencies, and interest groups

Agenda and Presenters

I. Importance of ongoing communication in subgrantee monitoring and basic strategies
   Greta Colombi, Research Analyst, NDTAC

II. Ongoing communication strategies in Wyoming
    Kenya Haynes, Title I, Part D, Program Manager, Wyoming Department of Education

III. Question and Answer Session

IV. Ongoing communication strategies in Florida
    Melvin Herring, Title I, Part D, Program Director, Florida Department of Education

V. Question and Answer Session
Webinar Outcomes

- SEAs and subgrantees will understand the importance of ongoing communication in improving subgrantee compliance.
- SEAs and subgrantees will adjust existing or institute new communication strategies to improve subgrantee compliance.
- SEAs and subgrantees will know where to turn for resources on adjusting or instituting new communication strategies.

Compliance Isn’t Built In A Day: The Importance of Ongoing Communication in Subgrantee Monitoring
Greta Colombi, NDTAC

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Why Subgrantee Monitoring Is Important

- Subgrantee monitoring is required (Title I, Part D, Nonregulatory Guidance: F-1, G-11, Q-1)
- The requirements are the backbone of the program
- Compliance is possible for subgrantees

Most States and subgrantees interpret the requirements as having to conduct/participate in onsite monitoring review process(es).

Like Rome, Compliance Isn’t Built In A Day

- Reviews tend to be short and infrequent
- Staff turnover tends to be high
- Requirements can be challenging to understand
Approach to Overcome Common Challenges in Subgrantee Monitoring

- Ongoing Communication
  - Process of message transaction between people to create shared meaning:
    - Process
    - Message exchange
    - Shared meaning


When to Communicate

- During onsite monitoring review process
  - In preparation for onsite monitoring review
  - During onsite monitoring review
  - After onsite monitoring review

- Between onsite monitoring reviews
  - Formal
    - Desk monitoring process
    - Regular conferences/meetings
  - Informal
    - Follow-up calls/emails

The National Evaluation and Technical Assistance Center for the Education of Children and Youth Who Are Neglected, Delinquent or At-Risk (NDTAC)

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What to Communicate on an Ongoing Basis

- Subgrantee Monitoring Basics
  - Schedule of onsite and remote/desktop monitoring
  - Onsite and remote monitoring protocols
  - Corrective action plan process
  - Resources to help achieve or maintain compliance
- Title I, Part D, requirements
  - Administrative
  - Implementation
  - Evaluation
  - Distinction between Subparts 1 and 2

How to Communicate on Ongoing Basis

- Add/expand current monitoring activities
- Follow-up on compliance issues
  - Conduct/follow-up on corrective action plans
  - Take notes on issues each subgrantee has/you have and touch base with subgrantee representative/SEA during face-to-face meetings or via email
- Collaborate with other program monitoring activities
- Integrate compliance issues into regular communications and activities
  - Annual Count meeting
  - Subgrantee application process
  - CSPR meeting/webinar
Ongoing Communication Strategies from the Field

- Wyoming
  - Use monitoring results and input from subgrantees to host regular conferences and provide targeted TA

- Florida
  - Implement a desk monitoring and self-certification process between onsite monitoring reviews

Have a Question?

During the Webinar, you can submit written questions by clicking the “Questions and Answers” (Q&A) button at the top left of your screen, typing your question in the box, and then pressing “Enter” to submit your question.
TITLE I, PART D, PROGRAM IMPROVEMENT IN WYOMING
KENYA HAYNES, WYOMING DEPARTMENT OF EDUCATION

Monitoring as process, not event

Context

- Total Student Population: 86,519
- Number of LEAs: 48
- Median LEA size: 830 students
  - PK-12
- N or D Student Population: 2,299
Monitoring Cycle

- 3 Year Cycle for both subparts
- Most on-site visits last one day, larger LEAs may have a two-day visit
- Subpart 2 visits are coordinated with the other programs in the Consolidated Grant
- Subpart 1 institutions are monitored independently

Subpart 1 Story

- Initial Monitoring Results
  - 31 Recommendations
  - 26 Fiscal Findings
  - 45 Program Findings
- Areas with most opportunity for improvement
  - Time/effort documentation
  - Institutionwide project planning
  - Services for English Language Learners
  - Annual Program Review
Increased Title I, Part D, Support

- Semi-annual face-to-face meetings
- Provision of monitoring documents annually
- Annual report of common findings
- Quarterly technical assistance for high-needs subgrantees by the SEA

Additional SEA Support

- Wyoming Department of Education (WDE) partnership with AdvancED/North Central Association (NCA-CASI) provides a school improvement specialist for each of the subgrantees.

- In 2008-09 WDE launched a district coaching program for high-needs LEAs. This year that program has been expanded to include institutional school settings. Coaching focuses not only on school improvement, but systems in general.
Results

- 2nd Monitoring Cycle Data (to date)
  - 6 Recommendations (-70%)
  - 11 Fiscal Findings (-42 %)
  - 15 Program Findings (-55%)

Contact Information

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  - Title I, Part D, Program Manager
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- You can also ask a question by typing it into the Question and Answer box near the bottom of the Webinar console

Title I, Part D, Compliance Monitoring

A Constant Connection
Melvin Herring, Florida Department of Education
Constant Connection

- It is essential that the SEA consistently monitor Title I, Part D, funded programs for compliance with the Title I, Part D, Law.
- Communication is a key aspect of successful monitoring and should be prevalent throughout the process.

Florida’s Process

- To ensure communication is present throughout the monitoring process.
  - Workpapers that outline individual compliance items; questions about compliance; and documents to be submitted for compliance are submitted to the subgrantees well in advance of all monitoring reviews.
  - Compliance issues are discussed during bi-monthly conference calls before, during, and after the monitoring review.
  - Compliance issues from the previous year are addressed in the design of the application for the following year.
Florida’s Methods of Monitoring

- Florida implements three methods of monitoring.
  - Onsite Monitoring
  - Desktop Monitoring
  - Self Certification Evaluation
- Onsite monitoring gives SEAs the best view of the day-to-day operations of an N or D program and allows them to easily recognize compliance issues.

Florida’s Monitoring Process

- All of Florida’s educational agencies, or subgrantees, are placed in a five-year rotation schedule.
- Subgrantees that are in the current year’s group are selected for onsite or desktop monitoring. This selection is dependent upon a risk factor analysis.
- In order to maintain constant connection all subgrantees not in the current year’s group are required to complete self certification evaluation.
Florida's 5-year Monitoring Schedule

Five Year Monitoring Schedule for 2009-2014

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Difficulties of Onsite Monitoring

- During onsite monitoring the SEA physically visits the N or D programs which may include:
  - Interviewing the Local Title I, Part D, coordinator
  - Visiting programs served by Title I, Part D

*It may be difficult to cover all agencies for many reasons*

- Too Many Agencies
- Too Much Travel
- Too Many Hats
- Several States

- Florida
  - 46 LEAs
  - 4 SAs
  - 147,046 Square miles
Desktop Monitoring

- Subgrantees submit documentation to the SEA to prove compliance using Florida’s online monitoring system.
- The SEA determines whether or not the documentation is sufficient for compliance.

Florida’s Desktop Process

- Subgrantees receive Workpapers well in advance of the documentation submission deadline.
- Program director conducts conference calls with subgrantees in order to walk-through documentation requirements.
- Subgrantees submit answers to the compliance questions and compliance documentation using Florida’s Online Monitoring System.
Sample Workpaper

Compliance Item Aid2-3: Any Local Educational Agency (LEA) that receives funds under this subpart shall ensure that formal agreements or contracts with correctional facilities comply with all elements in section 1425 of the NCLB Law. Section 1425(1), P.L. 107-110

Finding(s)
The LEA should: ensure that formal agreements or contracts with correctional facilities comply with all elements in section 1425 of the NCLB Act.

Review Question(s)
How did the LEA ensure that formal agreements or contracts with correctional facilities comply with all elements in section 1425 of the NCLB Law?

Documents to Support Compliance
Formal Agreements: Evidence that the LEA has formal agreements with correctional facilities that comply with all 11 elements in section 1425 of the NCLB Law including at least one of the following:
- actual formal agreements with all 11 elements highlighted; and/or
- addendums to all formal agreements that ensures compliance with the 11 elements

Sample Documentation

COOPERATIVE AGREEMENT
BETWEEN THE SCHOOL BOARD OF HAMILTON COUNTY, FLORIDA AND THE DEPARTMENT OF JUVENILE JUSTICE
ATTACHMENT B: FORMAL AGREEMENTS
In compliance with PL 107-110, Section 1423, we agree to meet all the requirements of PL 107-110, Section 1425, as follows:
- if the child or youth is identified as in need of special education services while in the correctional facility, we will notify the local school of the child or youth of such need;
- where feasible, we will provide transition assistance to help the child or youth stay in school, including coordination of services for the family, counseling, assistance in accessing drug and alcohol abuse prevention programs, tutoring, and family counseling;
- where feasible, we will ensure that educational programs in the correctional facility are coordinated with the student’s home school, particularly with respect to a student with an individualized education program under part B of the Individuals with Disabilities Education Act;

Compliance:
☑️ Yes  ☐ No  Reviewed by: ______________________

Florida’s Desktop Process
Certified Self-Monitoring

- Subgrantees collect documentation to prove compliance.
- Subgrantee head certifies compliance and reports certification to SEA using the Self Certification Evaluation.

*****Responsibility is placed on the subgrantee head.*****

Florida’s Self Certification Process

- Subgrantees receive Workpapers well in advance of the Self Certification Evaluation submission deadline.
- Program director conducts a conference call with subgrantees in order to walk-through documentation requirements.
- Superintendents certify compliance with each item by completing a self certification survey.
- Completed surveys are submitted to the SEA.
Florida’s Self Certification Process

- Methods Ensure Self Certification
  - Annual Internal Monitoring
    - Individual Program or LEA level staff conducting mock monitoring visits on all N or D programs within the state
    - Annual compliance monitoring by external parties
    - Peer monitoring
Contact Information

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