

NDTAC Tip Sheet

Title I, Part D Subgrantee Monitoring Menu



THE
NATIONAL TECHNICAL
ASSISTANCE CENTER
FOR
THE EDUCATION OF
NEGLECTED OR DELINQUENT
CHILDREN & YOUTH

Purpose

The purpose of this Tip Sheet is to provide Title I, Part D State coordinators with suggestions for questions and requested documentation to include when developing monitoring protocols for their Title I, Part D subgrantees.

While recognizing state discretion in monitoring decisions, this list of recommended Title I, Part D program areas for review can serve as a foundation for subgrantee monitoring efforts.

The information is organized into sections for Subpart 1 and Subpart 2 grants. For a more thorough description of the monitoring process, see the “Monitoring” section of the [Title I, Part D State Coordinator’s Orientation Handbook](#).

Subpart 1: State Agencies (SAs)

Area	Description of the Program(s) being Served
Description	To effectively monitor a Title I, Part D subgrantee, the State coordinator should understand how their program operates and who they serve. Asking for a description of the program at the beginning of your monitoring process will help you to understand how the funds are being used and who the program serves.
Potential Questions for Subgrantees	<ul style="list-style-type: none">• Describe the Title I, Part D, Subpart 1 program being funded at (name of facility or SA)• Describe the characteristics and needs of the youth served by the Title I, Part D program
Possible documentation subgrantees should provide to the State Education Agency (SEA) prior to monitoring	<ul style="list-style-type: none">• Written description of program• Mission and vision statement• Other materials that describe the program (e.g., website, pamphlets, promotional materials)

Area	SA and Facility Eligibility
Description	<p>Through monitoring, State coordinators should ensure subgrantee eligibility. To be eligible for a Subpart 1 award, subgrantees must be an SA that is responsible for providing free public education for children and youth:</p> <ol style="list-style-type: none">1. In institutions for neglected or delinquent children and youth2. Attending community day programs for neglected or delinquent children and youth; or3. In adult correctional institutions. [Sec. 1411]

Potential Questions for Subgrantees	<ul style="list-style-type: none"> • Describe the purpose and mission of the facility • Describe the educational program for students in your facility. What does a typical day look like as a student in this facility? • How does the SA determine which programs will receive Title I, Part D services?
Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • Copy of the policy, rule, or law that designates the SA as the agency responsible for providing educational services
Provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • List of schools or educational programs the SA is serving under Title I, Part D, Subpart 1

Area	Annual Count
Description	<p>The monitoring process provides a good opportunity for SEAs to examine the SA’s annual count process. After identifying an eligible institution, the SEA must count eligible students within the program.</p> <p>The SA must count the number of N or D children and youth, aged 20 or younger, who are in:</p> <ol style="list-style-type: none"> 1. State-operated adult correctional facilities and who are enrolled in a regular program of instruction for at least 15 hours per week; and 2. State N or D institutions or community day programs for children and youth who are enrolled in a regular program of instruction for at least 20 hours per week. [Nonregulatory guidance A-1]. <p>The SEA must adjust the count of children and youth enrolled in a regular program of instruction to reflect the relative length of the SA's annual programs by:</p> <ol style="list-style-type: none"> A. Multiplying the number of children and youth enrolled, by the number of days per year the regular program of instruction operates; and B. Dividing that number by a number that represents the number of school days in the academic year for the State (e.g., 180). [Nonregulatory guidance A-1]
Potential questions for subgrantees	<ul style="list-style-type: none"> • Describe your annual count process. • How do you collaborate with the facilities to ensure only eligible children and youth are counted in the annual count? • How do you select the annual count date each year?
Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • Annual count submission • Documents used to collect data if collecting from multiple facilities • Any internal SA guidance on collecting annual count data

Area	Institution-wide Projects
Description	<p>Under Section 1416 of the Title, I Part D statute, SAs have the opportunity to serve all children in, and upgrade the entire educational effort of, the institution or program if the SEA has approved a comprehensive plan.</p> <p>Institution Wide Projects (IWP) are only for SAs serving juveniles, or SAs where all students are eligible to receive services. As a result, IWPs cannot be implemented in adult facilities. The exception being facilities that only provide services to young adults up to age 21 and where the only students in the classroom are those who have not obtained a regular high school diploma or GED.</p> <p><i>Note: This plan is optional and may not apply to all programs receiving Title I, Part, Subpart 1 funding.</i></p>
Potential questions for subgrantees	<ul style="list-style-type: none"> • Describe the IWP used at this program • How do you assess the effectiveness of the IWP?
Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • Copy of most recent IWP

Area	Use of Funds
Description	<p>SAs receiving a Title I, Part D subgrant must use funds for programs and projects that concentrate on providing participants with the knowledge and skills needed to make a successful transition to secondary school completion, career and technical education, further education, or employment. In addition, these programs and projects must be designed to support educational services that:</p> <ol style="list-style-type: none"> 1. Except for institution-wide projects, are provided to children and youth identified by the SA as failing or most at-risk of failing to meet the challenging State academic standards; 2. Respond to the educational needs of such children and youth, including by supplementing and improving the quality of educational services provided to these children and youth by the SA; and 3. Afford such children and youth an opportunity to meet challenging State academic standards. (ESEA section 1415(a)(2)(B)) <p>Funds must be used in a supplemental manner in accordance with ESEA Section 1118. For more information on Use of Funds, see Section 1415 of the Title I, Part D Statute and the NDTAC Use of Funds Tip Sheet.</p>
Potential questions for subgrantees	<ul style="list-style-type: none"> • Describe how the program intends to use their Title I, Part D, Subpart 1 funds this fiscal year to supplement the regular educational program. • How does the program make decisions on how best to use Title I, Part D funding? • How does the SA evaluate the success of their Title I, Part D program? • How does the SA ensure the use of funds align with the purpose of Title I, Part D?

	<ul style="list-style-type: none"> • How does the SA ensure the Title I, Part D funds are only used to fund allowable expenses under the statute? • How does the SA ensure the use of funds is reasonable and necessary? • How does the SA ensure the use of funds is supporting only students who are eligible for Title I, Part D services?
Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • Program budget • List of expenses • Needs assessment • Inventory list • Personnel time sheets

Area Review of Application Requirements	
Description	<p>The application process lists several required components for the educational program operated by the SA. Monitoring provides an opportunity to explore those requirements more in depth and verify their inclusion in the program.</p> <p><i>**It is recommended that if the review is going to examine special education programs, the SEA should involve key personnel from their state office of special education.</i></p>
Potential Questions for Subgrantees	<ul style="list-style-type: none"> • Describe how appropriate professional development will be provided to teachers and other staff. [Sec. 1414(c)(10)] • How does the SA work with children and youth with disabilities to meet an existing individualized education program? [Sec. 1414(c)(15)] • How does the program ensure that certified or licensed teachers and other qualified staff are trained to work with children and youth with disabilities and other students with special needs, taking into consideration the unique needs of such students? [Sec. 1414(c)(17)]
Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • List of teacher licensure and/or credentials • Sign-in sheets from professional development opportunities • List of expenditures related to professional development

Area Transition Services	
Description	<p>Each SA shall reserve not less than 15 and not more than 30 percent of the amount such agency receives under this subpart to support transition services. [Sec. 1418]</p>
Potential questions for subgrantees	<ul style="list-style-type: none"> • How does the SA ensure that the proper amount of funds are reserved and used for this purpose? • Describe the transition services provided to students that help facilitate their successful reentry into their local school, post-secondary education, and/or the workforce. • How does the program work with families and the community to facilitate successful transitions back into the home and community?

Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • Student transition plans • List of expenditures for transition related services/items
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Area Data Collection (CSPR/EDFacts)	
Description	<p>Annually, SAs must collect and submit program participation data to the SEA for the Title I, Part D federal data collection, including data that are required through EDFacts and the Consolidated State Performance Report (CSPR). For information on data collection see:</p> <ul style="list-style-type: none"> • Title I, Part D Data Collection Shopping List • Title I, Part D CSPR Data Reporting Forms • File Specifications - EDFacts
Potential Questions for Subgrantees	<ul style="list-style-type: none"> • Describe your process for collecting and submitting program performance data for the annual CSPR/EDFacts report. • How does the program use their academic data, such as graduation rates, number of credits earned, or progress in reading and math to improve student academic success?
Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • EDFacts/CSPR data submission • Internal tools the program uses to collect EDFacts/CSPR data on an ongoing basis • List of initial and follow-up assessment tools • Procedures for collecting academic outcomes after a student has left the program • If a program is not allowed to contact the student after discharge, ask for a policy, rule, or law that states this is not allowable.

Subpart 2: Local Education Agencies (LEAs)

Area Description of the Title I, Part D Program	
Description	To properly monitor a Title I, Part D program, it helps to understand how the LEA is using Title I, Part D funds to serve eligible children and youth.
Potential questions for subgrantees	<ul style="list-style-type: none"> • Describe the Title I, Part D, Subpart 2 program being funded by (name of LEA). • Describe the characteristics and needs of the youth to be served by the Title I, Part D program. • Describe the impact the Title I, Part D program has had on the students • What are some highlights of the Title I, Part D program? • What areas of the Title I, Part D program might you improve upon in the upcoming year?

Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • Written description of the Title I, Part D program • Needs assessment • Budget for the Title I, Part D program
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LEA/Facility Eligibility	
Description	<p>State coordinators must ensure subgrantee eligibility. To be eligible for a Subpart 2 award, LEAs must have an eligible institution for delinquent children within their geographic boundaries.</p> <p>A delinquent facility is defined as a public or private residential facility for the care of children who have been adjudicated to be delinquent or in need of supervision. [Sec. 1432]</p>
Potential Questions for Subgrantees	<ul style="list-style-type: none"> • What is the primary purpose of the facility in which the students reside? • How are students placed in the facility? • Are the students adjudicated to be delinquent or in need of supervision?
Possible Documentation Subgrantees Should Provide to the SEA Prior to Monitoring	<ul style="list-style-type: none"> • Mission, purpose, charter statement of facility • Informational pamphlet or materials describing the program • Clear descriptions of the type of student in the facility and how the student is placed in the facility – who places them in the facility?

Communication Practices and Formal Agreements between LEA and Facility	
Description	<p>The LEA and facility must have a formal agreement in place regarding the program to be assisted. This requirement is described in Section 1423(2). For more information on formal agreements, see the NDTAC Formal Agreement Resources.</p>
Potential questions for subgrantees	<ul style="list-style-type: none"> • Describe the formal agreement that exists between the LEA and facility. • Describe the communication practices between the LEA and facility (e.g., how frequent, what methods are used, who are the contacts). • How often is the formal agreement updated?
Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • Copy of formal agreement • Meeting notes or attendance from Title I, Part D meetings between two agencies

Annual Count	
Description	<p>The monitoring process provides a good opportunity for SEAs to examine the LEAs annual count process. After identifying an eligible institution, the LEA must count eligible students within the program. To be counted, a child or youth must:</p>

	<ul style="list-style-type: none"> • Be age 5 through 17 during the count period • Live in a locally operated facility that meets the definition of an institution for neglected children, an institution for delinquent children and youth or an adult correctional institution as provided in section 1432(1) or (4)(B) of Subpart 2 – and not be counted in the enrollment data submitted to ED for Subpart 1 State Agency N or D program allocation purposes • Live in the institution for at least one day during the 30-day count period. [Nonregulatory Guidance L-2]
Potential questions for subgrantees	<ul style="list-style-type: none"> • How do the LEA and facility collaborate to ensure the annual count is submitted timely and accurately? • What is the process for counting children and youth for the annual count? • What dates did the LEA use as the annual count window during the last collection period?
Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • Sample communication between LEA and facility on the annual count (emails, meeting notes) • Last year’s annual count documentation

Area	Use of Funds
Description	<p>During monitoring it is critical for SEAs to examine the ways in which LEAs are using Title I, Part D funds to serve delinquent children and youth. In general, LEAs may use the funds for:</p> <ol style="list-style-type: none"> 1. Programs that serve children and youth returning to local schools from correctional facilities, to assist in the transition of such children and youth to the school environment and help them remain in school to complete their education; 2. Dropout prevention programs which serve at-risk children and youth; 3. The coordination of health and social services for such individuals if there is a likelihood that the provision of such services, including day care, drug and alcohol counseling, and mental health services, will improve the likelihood such individuals will complete their education; 4. Special programs to meet the unique academic needs of participating children and youth, including career and technical education, special education, career counseling, curriculum-based youth entrepreneurship education, and assistance in securing student loans or grants for postsecondary education; 5. Programs providing mentoring and peer mediation; 6. Programs for at-risk Indian children and youth, including such children and youth in correctional facilities in the area served by the LEA that are operated by the Secretary of the Interior or Indian tribes; and 7. Pay for success initiatives. [Sec. 1424] <p>For more information on use of funds, see the Tip Sheet on The Use of Title I, Part D Funds.</p>
Potential questions for subgrantees	<ul style="list-style-type: none"> • What are some of the most common uses of Title I, Part D funding by the LEA?

	<ul style="list-style-type: none"> • How have Title I, Part D funds been used to improve the academic programming for delinquent children and youth? • How does the LEA ensure that all uses of funds are allowable according to statutory and regulatory requirements? • How does the LEA evaluate the success of their Title I, Part D program? • How does the LEA ensure the use of funds align with the purpose of Title I, Part D? • How does the LEA ensure the Title I, Part D funds are only used to fund allowable expenses under the statute? • How does the LEA ensure the use of funds is reasonable and necessary? • How does the LEA ensure the funds are used only for students who are eligible for Title I, Part D services?
Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • Program description • List of personnel funded by Title I, Part D • Inventory list • Program budget

Area	Application Requirements
Description	<p>The application process lists several required components for the Title I, Part D program being served by the LEA. Monitoring provides an opportunity to explore those requirements more in depth and verify their inclusion in the program.</p> <p><i>Note: It is recommended that if the review is going to examine special education programs, the SEA should involve key personnel from their state office of special education.</i></p>
Potential questions for subgrantees	<ul style="list-style-type: none"> • How does the LEA coordinate with facilities working with delinquent children and youth to ensure that such children and youth are participating in an education program comparable to one operating in the local school such youth would attend? [1423(3)] • How does the program involve parents and family members in efforts to improve the educational achievement of their children, assist in dropout prevention activities, and prevent the involvement of their children in delinquent activities? [1423(8)] • How does the LEA ensure correctional facilities working with children and youth are aware of a child’s or youth’s existing individualized education program? [1423(12)]
Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • Daily student schedule • List of course offerings • List of teacher licensure or credentials • Sign-in sheets from professional development opportunities • Flyers, sign-in sheets, or materials from family engagement activities

Area	Data Collection (CSPR/EDFacts)
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Description	<p>Annually, LEAs must collect and submit data to the SEA for the Title I, Part D federal collection, including data that are required through <i>EDFacts</i> and the Consolidated State Performance Report (CSPR). For information on data collection, see:</p> <ul style="list-style-type: none"> • Title I, Part D Data Collection Shopping List • Title I, Part D CSPR Data Reporting Forms • <i>EDFacts</i> SY 2022–23 Non-XML File Specifications [113, 119, 125, 127, 218, 219, 220, 221, 224, and 225]
Potential questions for subgrantees	<ul style="list-style-type: none"> • Describe your process for collecting and submitting program performance data for the annual CSPR/<i>EDFacts</i> report • How does the program use their academic data, such as graduation rates, number of credits earned, or progress in reading and math to improve student academic success?
Possible documentation subgrantees should provide to the SEA prior to monitoring	<ul style="list-style-type: none"> • <i>EDFacts</i>/CSPR data submission • Internal tools the program uses to collect <i>EDFacts</i>/CSPR data on an ongoing basis • List of initial and follow-up assessment tools • Procedures for collecting academic outcomes after a student has left the program • If a program is not allowed to contact the student after discharge, ask for a policy, rule, or law that states this is not allowable

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