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Voices From the Field

Optimizing Title I, Part D Fund Management: Insights from State Educational Agencies

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

www.Neglected-Delinquent.ed.gov



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

About the National Evaluation and Technical Assistance Center for the Education of Children and Youth Who Are Neglected, Delinquent, or At Risk

The mission of the National Evaluation and Technical Assistance Center for the Education of Children and Youth Who Are Neglected, Delinquent, or At Risk (NDTAC) is to improve educational programming for youth who are neglected or delinquent. NDTAC's legislative mandates are to develop a uniform evaluation model for State Educational Agency (SEA) Title I, Part D, Subpart 1 programs; to provide technical assistance to states in order to increase their capacity for data collection and their ability to use those data to improve educational programming for youth who are neglected or delinquent; and to serve as a facilitator among different organizations, agencies, and interest groups that work with youth in neglect or delinquent facilities. For additional information on NDTAC, visit the center's website at <https://neglected-delinquent.ed.gov>.

Introduction

Spending Title I, Part D funds effectively, efficiently, and in a timely manner can be a challenge for State educational agencies (SEAs). Delays in spending funds can occur for myriad reasons. Sometimes, there is a change in leadership in the SEA, State agency (SA), local educational agency (LEA), or facility that can cause confusion or delays in spending funds. At other times, major purchases under the program may fall through, leaving the subgrantee with excess funds in their balance and inadequate time or resources to spend the remaining funds (e.g., a facility closes down with unspent funds, staffing issues result in a high percentage of unspent funds). For example, a program may decide to hire a transition specialist with the Title I, Part D funding that will account for 70% of its annual grant, but when they try to hire for the position, they are unable to find qualified candidates for the role. This problem can leave the program scrambling to reprioritize and distribute their funding to effectively serve students. In this Voices From the Field, we explore the Title I, Part D fiscal cycle and hear from seasoned State coordinators on ways they proactively engage their subgrantees and programs to ensure the effective and efficient spending of Title I, Part D funding.

Fiscal Cycle

Title I, Part D funds are awarded on an annual basis on July 1st. For example:

- ✓ Fiscal year 2024 funds were awarded on July 1, 2024.
- ✓ Funds must be obligated 27 months from the award date, or through September 30, two years after the award is made. Funds awarded on July 1, 2024, must be obligated by September 30, 2026.
- ✓ SEAs have until January 30 of the following year (4 months later) to liquidate the funds. [[2 CFR 200.344\(c\)](#)]

Common Challenges

Challenges obligating and liquidating funds in Title I, Part D can occur for a variety of reasons at any level of the distribution of the funds to grantees and subgrantees. Agencies typically must coordinate to identify funding priorities and ensure allocations are fully utilized within the period of performance. Typically, the movement and coordination of funds goes through the SEA to the SA or the LEA, which then must coordinate with the program or facility that will receive services under the grant. Often, each of these agencies has different leadership, different policies around finances, and even different priorities in how funds should be spent. Some of the more common issues that delay timely spend down include:

Definitions

Obligation: *An obligation of funds is a legal liability to disburse funds immediately or at a later date as a result of a series of actions. [[50 CFR 80.91](#)]*

Liquidation: *means the final computation or ascertainment of duties on entries for consumption or drawback entries. [[eCFR : 19 CFR 159.1 - Definition of liquidation](#)]*

- **Change in leadership at SEA, SA, LEA, or program level:** when key personnel who oversee Title I, Part D programming at any level turn over, it can lead to disruptions in program implementation. Personnel who are new to the program may not understand how the program works, what is allowable within the program, and other key elements of administering the program leading to a delay in spending.
- **Failure to hire salaried positions or unexpected vacancy of position:** Title I, Part D funds are frequently used to hire positions within the program. Oftentimes, they are used for transition coordinators, paraprofessionals in the classrooms, and tutoring. When a program fails to hire for the position in a timely manner or has unexpected turnover, it can lead to a significant amount of funding not being used in a timely manner.
- **Failure to secure significant purchases:** computers, projectors, software purchases, career and technical education (CTE) equipment, and smartboards are all examples of instructional support items that may be purchased using Title I, Part D funds. These purchases are a great way to enhance a program and provide opportunities for students. Procurement delays or other procurement challenges can risk funds not being fully utilized.
- **Lack of attention to timeline and knowledge of progress on budget:** many times, especially at the programmatic and LEA or SA level, the Title I, Part D administrator fulfills multiple roles on the education team. For example, the Title I, Part D coordinator at the program level may also serve as the program's principal, teacher, and special education coordinator. At the LEA level, the coordinator is often in charge of multiple federal programs. Because of this, they may inadvertently be unable to regularly evaluate their program budget and plan to spend down their Title I, Part D funds. Even with the best intentions, if the program is not visited in a regular, consistent capacity, it can lead to excess funds remaining at the end of the fiscal cycle.
- **Lack of understanding of what funds can be spent for:** Title I, Part D can be a complicated program if key personnel do not have the training and understanding to implement the program. Lack of understanding on how the program can be used to benefit students can lead to disagreement between administrators that results in a delay in spending funds on time or differences in how to use the funds appropriately.
- **Lack of understanding of supplement, not supplant (SNS) provisions and when they apply:** Title I, Part D, Subpart 1 funding can only be used to supplement (not supplant) the existing instructional program. At times, programs can struggle to understand this nuance and identify appropriate activities or supports that comply with the SNS provision. For example, if an adult correctional facility provides GED preparation and testing through their education program, the SA would not be able to use Title I, Part D funding to cover the cost of materials and a portion of the teacher's salary for those students 21 and younger. Title I, Part D funds must be used for supplemental services, such as tutoring or additional materials (such as reading materials or math manipulatives), to support the learning of eligible children and youth. This misunderstanding can cause a delay on the subgrantee's part as they work to modify their application and identify eligible activities or supports to fund.

Understanding key issues behind lack of spending can help State coordinators target areas for improvement and provide support to their stakeholders. In this way, State coordinators can improve fiscal practices across their programs, as well as student outcomes.

Voices from the Field

In this Voices from the Field, we hear from seasoned State coordinators in Oregon, New Jersey, and Kentucky on their successful practices and recommendations on how other SEAs can best structure their programs for success.

Oregon

Oregon is one of the few States with a significant number of neglected programs under Title I, Part D, Subpart 1. Additionally, the SEA concurrently functions as a SA. Consequently, the SEA is responsible for administering Title I, Part D, Subpart 1 funds to itself to support the 27 neglected facilities served by the SA.

At the forefront of this process is Sam Ko, the State coordinator for Neglected programs under Title I, Part D, Subpart 1 at the Oregon Department of Education (ODE), who also serves as the SA point of contact for Title I, Part D, Subpart 1-Neglected. In his role, Mr. Ko administers the Title I, Part D Subpart 1 neglected award from ODE and subsequently oversees the allocation of funds to the 27 neglected facilities. He works closely with each facility

to ensure proper funding oversight and compliance with spending protocols. Through Mr. Ko's oversight and collaboration with the neglected facilities, ODE is able to consistently utilize its funds year after year, ensuring the full allocation is directed to neglected students within the State. This is achieved through a well-defined structure that includes specific deadlines and actionable steps for facilities when those deadlines are not met. ODE has implemented a unique approach whereby programs that fail to spend their funds within the biannual grant agreement period must forfeit any remaining balance back to the SA. These funds are then redistributed to facilities that have successfully utilized their allocated funds within the prescribed time period. New grants are awarded on a per-pupil basis, with a defined spending deadline, ensuring all funds are spent within the 27-month window.

This systematic approach not only provides clear guidance to the receiving facilities but also incentivizes timely spending. Facilities are motivated to manage their funds efficiently to potentially secure additional funding at the end of the year. Furthermore, it alleviates the burden on facilities struggling to meet spending deadlines by eliminating unspent funds, allowing them to focus on their current year's expenditures without the distraction of excess funds.

Oregon, Subpart 1 Quick Glance 2021-22

- *Allocation: \$1,821,132*
- *Number of Programs: 38*
- *Number of Students Served: 1,644*

Most of the neglected programs in OR allocate their funding toward transition coordinators, a required element in all neglected programs as outlined in the memorandum of agreement between the SA and the facilities. This requirement is also verified during the monitoring process.

When asked about the key to effective and efficient Title I, Part D spending, Mr. Ko identified three essential components:

- **Relationship Building:** Mr. Ko emphasized the importance of fostering strong relationships with program staff, as this facilitates open communication and enhances overall program effectiveness.
- **Quarterly Reports:** ODE mandates that facilities submit quarterly reports on their spending, even if no funds have been expended. This practice encourages facilities to regularly review their financial status and keeps all stakeholders informed on the facility's progress toward meeting spending goals.
- **Clear Deadlines:** Having well-defined deadlines and corresponding actions ensures that all parties are fully aware of the expectations and can plan accordingly.

Oregon's innovative approach to administering Title I, Part D funding ensures that resources are allocated and spent timely and effectively, directly benefiting neglected students across the State.

New Jersey

New Jersey's Title I, Part D Subpart 1 program supports three subgrantees who, in turn, oversee 35 individual programs. Under Subpart 2, six LEAs serving juvenile detention facilities receive Title I, Part D funding, collectively serving approximately 1,500 students annually. Leading this initiative is Francine Stromberg, a highly experienced State coordinator. Ms. Stromberg has developed and implemented several effective strategies to ensure that Title I, Part D funds are utilized both efficiently and effectively.

A cornerstone of New Jersey's Title I, Part D fiscal management is timely and transparent communication among all participating agencies. At the SEA level, the fiscal team consistently monitors the balance of available funds and promptly communicates any concerns to Ms. Stromberg. In response, she proactively contacts the respective SA or LEA to address and resolve issues collaboratively. Additionally, SAs are required to submit both interim and final expenditure reports to the SEA, reinforcing accountability and ensuring a shared understanding of the funding obligations.

Beyond these standard procedures, Ms. Stromberg emphasizes the importance of cultivating strong relationships with program staff. By fostering open lines of

New Jersey Title I, Part D Quick Glance 2021-22

Subpart 1

- *Allocation: \$1,410,126*
- *Number of Programs: 38*
- *Number of Students Served: 1,765*

Subpart 2

- *Allocation: \$920,599*
- *Number of Programs: 6*
- *Number of Students Served:*

communication and building trust, she encourages program personnel to seek guidance from the SEA. This proactive and approachable management style enables timely intervention and reduces delays that might otherwise occur while waiting for formal reporting.

The State coordinator noted that most programs allocate their budgets primarily toward staffing. These positions typically include additional instructional staff specializing in core academic areas such as mathematics and reading, as well as transition specialists who support students as they re-enter school systems, join the workforce, or integrate back into their communities. These roles greatly enhance both student outcomes and overall program quality, but they also pose potential challenges related to staff turnover – an issue that is often prevalent in neglected and delinquent settings. To mitigate this risk, New Jersey programs place a strong emphasis on staff retention, with many programs successfully maintaining key personnel year after year.

When programs encounter difficulties in fully utilizing their funds, Ms. Stromberg provides individualized support and guidance. She advises programs to begin by examining their *EDFacts* and Consolidated State Performance Report (CSPR) data to identify areas of student need. Using this data-driven approach, programs can then develop targeted plans to help students achieve rigorous State academic standards. For example, Middlesex County Juvenile Detention Center (MCJDC) initially struggled to allocate some of its Title I, Part D funds. After a collaborative planning session, the program chose to enhance its transition services. This enabled MCJDC to fund a dedicated transition coordinator and acquire supplemental curriculum materials. After the implementation of this program, the facility reported an improvement in student English and math scores. Students earning an A in English went from 19% to 29% and students earning a B rose from 24% to 33%. In math, students receiving an A went from 19% to 25% and students receiving a B went from 24% to 42%. The facility also administered pre- and post-surveys to the students to learn more about their experiences and gathered anecdotal data during group meetings. Students reported that after implementation of the program, education became more important to most of the students. Additionally, the facility reported that students felt inspired by the program and started to express their emotions through writing.

New Jersey's Title I, Part D program stands out as a model of effective grant management, rooted in strategic communication, collaborative leadership, and data-driven decision-making. Under the stewardship of Ms. Stromberg, the State has built a culture of trust, accountability, and innovation that enables programs to navigate challenges and continually improve services for youth in neglected and delinquent settings. These practices not only ensure the efficient use of federal funds but also contribute to meaningful educational outcomes for some of the State's most vulnerable student populations.

Kentucky

Kentucky's Title I, Part D program has two subgrantees under Subpart 1 supporting 39 facilities and 19 LEAs supporting 19 programs under Subpart 2. With over \$2.6 million in federal funding, two SEA coordinators, Monica Higgins and Wes Blake, are responsible for ensuring the timely and efficient allocation of these resources to support at-risk students. The two coordinators work

closely together, with Ms. Higgins primarily overseeing Subpart 1 and Mr. Blake primarily overseeing Subpart 2.

To facilitate effective fund management, the Kentucky Department of Education (KDE) employs a multifaceted approach. A cornerstone of this strategy is frequent and proactive communication. The KDE finance team regularly notifies subgrantees of their current fund balances via email, offering real-time insight into remaining funds and encouraging timely expenditures. These communications are supplemented by detailed updates within the State’s grant management system, ensuring subgrantees remain informed of their financial progress.

Additionally, Ms. Higgins and Mr. Blake have created a dedicated shared drive specifically for Title I, Part D subgrantees, which houses a variety of resources aimed at improving program administration. This virtual space fosters communication and collaboration among Title I, Part D professionals across the State, allowing them to share strategies, resources, and best practices. The drive contains ten sections to assist subgrantees: discussion area; related resources; finance resources; application; performance reports; child count; monitoring; Title I, Part D training materials/resources; new coordinator training materials; and forms.

KDE further strengthens its oversight by hosting monthly meetings with Subpart 1 subgrantees. These consistent touchpoints allow for ongoing dialogue and technical assistance, ensuring all subgrantees clearly understand their grant status and spending responsibilities.

Monitoring is another key component of KDE’s accountability framework. Subpart 2 programs undergo monitoring at least once every three years, while Subpart 1 programs are reviewed every other year. Each monitoring includes a comprehensive fiscal review using a standardized checklist, an examination of project budget reports from the State’s financial system (formerly known as MUNIS), and interviews with key stakeholders – including staff from the SA or LEA, facility administrators, and fiscal officers. Importantly, KDE conducts all monitoring visits in person, enabling more effective communication, timely issue resolution, and a more holistic understanding of program operations.

KDE shared that most programs allocate funds to staff positions in areas such as student transition and supplemental instruction. While this investment is impactful, it poses challenges when staff turnover occurs. For example, a sudden loss of Title I, Part D-funded staff in recent years disrupted service delivery and created under-spending issues. In response, KDE partnered with subgrantees to develop targeted spending plans, which included submitting quarterly progress reports and exploring alternative investments. These included upgrading technology infrastructure (e.g., laptops), investing in career and technical education (e.g., virtual welding simulators), and providing high-quality professional development through State and national conferences.

Kentucky Title I, Part D Quick Glance 2021-22

Subpart 1

- Allocation: \$1,332,972
- Number of Programs: 36
- Number of Students Served: 1,463

Subpart 2

- Allocation: \$1,391,936
- Number of Programs: 23
- Number of Students

Kentucky’s approach to managing Title I, Part D funds demonstrates a strong commitment to fiscal responsibility, program integrity, and student success. Through ongoing communication, collaborative support systems, and rigorous in-person monitoring, KDE ensures that federal funds are used strategically and effectively. By remaining responsive to challenges – such as staffing fluctuations – and supporting innovation in spending, Kentucky serves as a model for how states can maximize the impact of Title I, Part D to improve outcomes for youth in neglected, delinquent, and at-risk situations.

Key Takeaways

Insights from experienced State coordinators, along with a review of common spending challenges, highlight several practical strategies that may help with timely and effective use of Title I, Part D funds. While not an exhaustive list, and with careful consideration for how they apply to the uniqueness of each State, the following practices may offer a strong foundation for building and sustaining a successful program:

- **Build Strong Relationships and Maintain Open Communication:** a recurring theme across coordinator interviews was the critical importance of cultivating strong relationships with all stakeholders involved in Title I, Part D programming. Proactive relationship-building fosters an environment where subgrantees feel comfortable reaching out with questions or concerns before issues escalate. Regular check-ins – whether through phone calls or site visits – are valuable opportunities to deepen understanding of local programs and establish trust, rather than waiting to address concerns only after they appear in reports.
- **Set Clear Deadlines and Foster Consistent Communication:** States with effective fund utilization practices often maintain well-defined deadlines and communicate expectations clearly with subgrantees. For example, in New Jersey, regular coordination between the State coordinator and fiscal team provided real-time insight into subgrantee spending. Similarly, Oregon implemented firm deadlines with a clear understanding that unused funds would be reallocated. Consider implementing tools such as spending plans requiring subgrantees to outline projected expenditures and conduct monthly check-ins or require quarterly spending reports to monitor progress.
- **Understand Program Needs Through Data Analysis:** even with strong systems in place, programs may still encounter challenges in fully utilizing their funds. Early intervention is key to allowing time for adjustments. A data-informed approach – reviewing *EDFacts* and CSPR data – can help identify program needs and guide more strategic spending. A clear understanding of the data and its implications enables better alignment of resources with student outcomes. Both the Title I, Part D Program Office and the National Technical Assistance Center for the Education of Neglected or Delinquent Children and Youth (NDTAC) offer support in data analysis and have several resources listed on their website.

- **Share and Promote Best Practices:** each subgrantee brings unique strengths and challenges. State coordinators can play a key role in identifying and highlighting successful practices – such as effective fund utilization or innovative program models that improve student outcomes. These can be showcased through webinars, written case studies, or facilitated peer visits. Communities of practice also provide a structured forum for subgrantees to exchange ideas, share lessons learned, and build collective capacity across programs.
- **Develop Effective Monitoring Practices:** monitoring serves as a valuable tool for examining Title I, Part D expenditures and identifying both effective practices and areas for improvement within a State. Through comprehensive monitoring of subgrantees, State coordinators gain deeper insight into how funds are being utilized and can assess the impact of those expenditures. Additionally, the monitoring process creates an opportunity to discuss barriers that may be delaying the use of funds and to collaboratively explore solutions. Most importantly, it brings together key stakeholders to address spending challenges and develop strategies to overcome them. Finally, monitoring equips SEAs with a mechanism to require specific corrective actions by subgrantees, helping to ensure that funds are used efficiently and effectively to enhance student outcomes.
- **Quality Technical Assistance and Professional Development Resources:** Title I, Part D can be a complex program to administer and not all subgrantees may have the knowledge about the program’s requirements. To support effective program implementation and improve student outcomes, it is essential to establish a robust network of technical assistance resources along with a comprehensive suite of high-quality professional development resources and events. State coordinators are encouraged to consider strategies, such as developing an online resource library, maintaining a shared drive to foster collaboration, and organizing live events that provide targeted training on grant administration and facilitate the exchange of best practices. These efforts should be underpinned by a responsive and proactive technical assistance approach, ensuring that State coordinators remain accessible to subgrantees and actively promote a culture where questions and dialogue are welcomed.
- **Leverage Any Remaining Funding to Support At-Risk Youth (Subpart 2 only):** in some cases, a facility receiving services from a Subpart 2-funded LEA may not require or be able to utilize its full allocation. It is important to remember that the LEA – not the facility – is the Subpart 2 grantee. Therefore, funds may be redirected to support at-risk students elsewhere within the LEA after consulting with the facility and determining that student needs are fully met. Allowable uses include supplemental tutoring, school reentry assistance, and mentoring programs, among others. LEAs are encouraged to explore the full range of allowable activities under funding for at-risk youth to ensure maximum impact.

Conclusion

Maximizing the impact of Title I, Part D funds requires a strategic and thoughtful approach from State coordinators. By fostering strong relationships, setting clear expectations, leveraging data to inform decisions, and promoting collaboration among subgrantees, SEAs can significantly enhance the effectiveness and efficiency of program implementation. While each State and program context may differ, these foundational practices offer a roadmap to ensure that funds are not only spent in a timely manner but are also aligned with the over-arching goal of improving outcomes for the youth served. Continued engagement, learning, and innovation will be key to sustaining success across the Title I, Part D community.

Resources

The following resources provide further guidance on spending down funds, use of funds, and applications that State coordinators may find useful in exploring this topic further.

- [NDTAC Tip Sheet – Use of Funds Decision Process](#)
- [NDTAC Tip Sheet – The Use of Title 1 Part D Funds – Decision Making](#)
- [ProgramAdminToolkitTool_1.docx](#)
- [April 2024 NDTAC Webinar: Allocations, Reallocations, and non-Traditional Allocations of Title I, Part D Subpart 2 Funds | NDTAC: Technical Assistance Center for the Education of Youth Who Are Neglected, Delinquent, or At-Risk](#)
- [February 2023 NDTAC Webinar: Use of Funds | NDTAC: Technical Assistance Center for the Education of Youth Who Are Neglected, Delinquent, or At-Risk](#)
- [Title I, Part D Program Administration Planning Toolkit | NDTAC: Technical Assistance Center for the Education of Youth Who Are Neglected, Delinquent, or At-Risk](#)

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