

2015 NDTAC NATIONAL CONFERENCE

TITLE I, PART D SEA MONITORING

Presented by:

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<http://www2.ed.gov/about/offices/list/oese/oshs/index.html>

Monitoring from FY2004 – FY2014

- In most years, at least 12 States monitored along with Title I, Part A
- FY 2013, 3 non-ESEA Flexibility States monitored; no more EHCY-NorD monitoring consultants
- FY 2014, only ESEA Flexibility Part B monitoring
- EHCY and NorD programs moved to OSHS on 10/5/14 while the rest of SASA becomes Office of State Support (OSS)
- Child Counts are managed by OSS and OSHS/TIPD staff do not see them; both offices coordinate on verifying them

Monitoring in 2015-2016

- TIPD monitoring plan released in December 2014
- OSHS will continue monitoring TIPD and EHCY together using former SASA indicators revised in October 2009
- New performance-based questions will be piloted, e.g., concerning leading indicators, LEA/program-level data in EDFacts; probably sent in advance from FY '16
- More reviews will be done remotely; maybe not webex
- Training of management and new staff in FY '15
- Overhaul of Plan and Indicators in FY '16 to be implemented in FY '17 (discussed in last two slides)

Monitoring in 2015-2016 (Cont'd)

- Most of 21 SEAs not reviewed prior to new indicators in FY 2010 will be monitored in FY 2015 and FY 2016, as GAO recommended
 - FY 2015 Reviews: AZ (Mar); MD (Apr); NV (May); PA, WA (Jun); CT (Sep)
 - Not since FY '07-08: AL, IN, MN, ND, NH, OH, SD, VA
 - Not since FY '09: AK, KY, SC, TN, UT, WVA, WY

Monitoring Risk Assessments

- Begun by OESE in FY '11 for programs in TA initiative; risk assessment method and monitoring plan required from FY '12
- TIPD and EHCY assessments combined but then Title I, Part A, Title III or SIG “outweighed” these assessments
- Every year the data and methods vary but most stable elements are:
 - Multiple or recurring findings in last review
 - Poor performance on reading and math assessments
 - State Coordinator turnover within 2 years
 - Large available balances 21 months into grant period
 - Years since last program review

Subgrantee Selection and Risk Assessment

- ED plans to use LEA subgrantee performance data to select Subpart 2 subgrantees for review
- GPRA measures and leading indicators are likely criteria
- Award amount, presence of EHCY subgrant and proximity to State capitol still remain top criteria
- LEAs selected will be asked about their ED Facts data which are aggregated to populate CSPR tables
- Agency Child Count and GEPA data on grant funds spent may be used.
- ED has limited access to State agency-specific data; SEAs may advise ED on subgrantee performance issues
- CRDC and OSEP data may be referred to from FY '16

ED Monitors States – not LEAs

- ED gathers evidence from the local level to assess the effectiveness and the impact of State policy on local practice.
- ED reviews the SEA's activities with its grantees: guidance and technical assistance.
- ED reviews the effectiveness of SEA monitoring of State and local agency programs.

State Monitoring of Subgrantees

- In addition to asking about SEA support for program implementation, monitors also ask about SEA monitoring including:
 - The schedule, process, and protocol for State monitoring;
 - The results of the most recent State monitoring of the program; and
 - Any corrective actions and follow-up by the SEA for any compliance issues identified.

Title I, Part D Monitoring Indicators

- 1.1: Program Evaluation & Monitoring
- 2.1: State Agency Program Requirements
- 3.1: Subpart 1 Fiscal Requirements: MOE, Supplement not Supplant, internal fiscal controls
- 2.2: Local Agency Program Requirements (LEAs)
- 3.2: Subpart 2 Fiscal Requirements: Internal fiscal controls, SEA-LEA facility contracts or agreements

- Coordinators may observe ED subgrantee interviews
- ED staff interviews State agency Coordinators and others remotely or on-site

Post-Review Activities

- Additional data collection, as needed
- The Monitoring Report
 - ED will send a draft report of recommendations and findings to the State coordinators within 35 business days
 - Final report issued within 5 days of receipt of State Coordinators' edits
 - SEA shares relevant information with the LEAs visited
 - SEA responds to ED's letter within 30 business days
 - NEW: OSHS commends "emerging practices" observed during the review; emerging practices offer ideas that work in specific situations but have not been evaluated as effective

Tips: Common Findings

- State agency application requirements such as data for MOE, names of transition coordinators for every facility, every description and assurance, all 8 IWP elements
- State agency institution eligibility to be served: RPI, ALOS, age range
- Use of TIPD to evaluate TIPD program value added
- LEA-facility agreements and some required descriptions
- Transition set-aside not clear from application, budget and/or budget narrative
- Timeliness of grant awards

TA on Preparing for Reviews

TA is already available on how to prepare for an ED review via the TA Centers:

- http://www.neglected-delinquent.org/sites/default/files/docs/monitoring_guide_20091111.pdf
- This product was prepared using ED's document review checklists and interview protocols
- OSHS plans are to make all of these available in the FY '17 monitoring plan or via software that can be used for ED monitoring or SEA self-assessment

Plans for FY 2016

- NDTAC may develop extranet website to upload monitoring documents; assist with desk monitoring
- NDTAC may provide State workbooks with *EDFacts* LEA level data and perhaps CRDC and OSEP data
- NDTAC may help develop State plan templates (and facilitate peer reviews of actual State plans)
- States will be asked to set annual goals for GPRA measures, leading indicators or other goals
- Ad hoc group to discuss fiscal guidance and monitoring
- Pilot interviews with parents and other stakeholders?

Plans for FY 2017 and Beyond

- All SEAs to be reviewed ideally once every five years and selected by risk assessment
- Risk assessments will be conducted annually (spring) to guide selection of States (summer)
- New monitoring plan and indicators to be issued in 2016
 - Expanded performance management indicator (1.2)
 - Rename Indicator 2 “Program Support,” include stakeholder recommendations?
 - Expanded fiscal desk monitoring (3.1 and 3.2)
- All document checklists and interview protocols to be released for monitoring self-assessment