Effectively Addressing Administrative Challenges of Implementing Title I, Part D

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Agenda

• Areas of administrative challenges:
  – Planning and funding
  – Monitoring and compliance
  – Reporting and evaluation

• Resources available for addressing administrative challenges of implementing Title I, Part D
Planning and Funding
Overview of Planning

Planning involves the following:

• Implementing the overall Title I, Part D program in your State

• Providing guidance to your subgrantees in their planning to ensure alignment with State and Federal requirements
Overview of Funding

U.S. Department of Education (ED) determines the amount of a State’s allocations based on the number of students submitted to ED in the Annual Child Count.

State Education Agencies (SEAs) allocate:

- Subpart 1 (S1) funds to State agencies (SAs) based on formula funding
- Subpart 2 (S2) funds to Local education agencies (LEAs) based on either formula funding or discretionary grants
Part D Coordinator Responsibilities: Planning and Funding

1. State educational agency (SEA) submits State Plan or Consolidated State Plan/Application to ED

2. SEA prescribes criteria for State agency (SA) and local educational agency (LEA) applications based on Title I, Part D, Section 1414(c) (SA applications) or Section 1423 (LEA applications) and the State Plan or Consolidated State Plan/Application as relevant and sends to subgrantees.

3. SA submits completed SA application to SEA

3. LEA submits completed LEA application to SEA

SA
SA

LEA
LEA
LEA
LEA
Part D Coordinator Responsibilities: Planning and Funding (cont.)

- Conduct the annual count and submit numbers to ED.
- Reserve funds for SEA administration, evaluation, and technical assistance (TA), if necessary.
- Determine SA eligibility.
- Review SA and LEA subgrantee applications
- Award allocations to eligible SA and LEA subgrantees.
Common Administrative Challenge: Planning and Funding

Group Exercise
At your table, discuss the following scenario:

• A facility that has received Part D funds in previous years but no longer wishes to receive funds and/or the facility closes after the annual count data was submitted.
  – What do you do with the funds intended for that facility?
  – How do you guarantee you receive Consolidated State Performance Report (CSPR) data for the current school year in which the facility did receive funds?
Common Administrative Challenge: Planning and Funding (cont.)

NDTAC encourages you to consider:
• If the facility closes, the funds should ideally follow the students.
  – What schools/facilities are the students being transferred to?
  – Are those facilities eligible to receive Part D funds?
  – Are the students being transferred to a different LEA?
• The funds can be returned to the SA or LEA, who can then reallocate the funds.
• Collecting CSPR data before the funding relationship ends is the best way to ensure you receive accurate data.
NDTAC’s Resources on Planning and Funding

Provides overview of and resources/tools for the following:

- Conducting needs assessments
- Developing and reviewing applications
- Creating formal agreements between agencies

NDTAC’s Resources on Planning and Funding (cont.)

- Describes tasks in Annual Count process
- Provides tools and resources to help State coordinators comply with Federal requirements

http://www.neglected-delinquent.org/sites/default/files/docs/AnnualCountToolkit_DeterminingFormulaCounts.pdf
NDTAC’s Resources on Planning and Funding (cont.)

Addresses:
- Purpose of the Annual Child Count
- Eligibility
- Relation to other ED reporting requirements
- Difference between the SA and LEA count

Monitoring and Compliance
What Is Monitoring Review?

• Program monitoring involves regularly and systematically examining program implementation and administration.

• Purposes of monitoring of Part D-funded programs are to accomplish the following:
  – Emphasize accountability for using resources.
  – Ensure that all children have equal opportunity to obtain a high-quality education.
  – Assess program implementation of policies and procedures for compliance.
Federal and Subgrantee Monitoring
Federal and Subgrantee Monitoring (cont.)

Subpart 1

State Agency subgrantees

2

Local Educational Agency subgrantees

2

Subpart 2

State Education Agencies

U.S. Department of Education
Part D Coordinator Responsibilities: Federal Monitoring

- Review the indicators and documentation that Federal monitors typically require to assess SEA program compliance.
- Communicate with ED.
- Review past monitoring reports for your State.
- Prepare your SAs and LEAs for Federal monitoring reviews.
Part D Coordinator Responsibilities: Subgrantee Monitoring

- Create subgrantee monitoring protocols and guidelines.
- Establish consistent monitoring “cycles” or schedules.
- Require corrective actions for subgrantees not in compliance.
- Ensure that LEAs and SAs are monitoring every facility that receives Part D funding.
Group exercise

At your table, discuss the following scenario:

• An SA or LEA is acting as a fiscal agent, passing funds through to a facility, but the SEA does not see evidence of monitoring oversight. What do you do in this case?
NDTAC encourages you to consider the following:

- What evidence is required for the SA or LEA to demonstrate appropriate fiscal management?
  - What are the responsibilities of the SA or LEA?

- Why is the monitoring not occurring?
  - Could the issue of capacity be addressed by providing the SA or LEA additional TA, monitoring tools, and training?
  - Is the SA or LEA withholding administrative funds, intended for fiscal oversight?

- There is a possibility for the SEA to act as the fiscal agent, but additional oversight may be required for SEAs financially transferring funds directly to a facility.
NDTAC’s Resource on Federal Monitoring

- Prepare for a Federal monitoring review.
- Use practical tips to meet compliance requirements.

Office of Safe and Healthy Students
Monitoring Plan for Homeless and Neglected or Delinquent Education Programs

- Purpose, rationale, and process used by OSHS in monitoring Part D programs
- Periodic Federal updates

NDTAC’s Resources on Subgrantee Monitoring

- Embeds a “youth- and staff-centered” framework in the subgrantee monitoring process
- Provides questions and approaches that can be integrated into the subgrantee monitoring process

http://www.neglected-delinquent.org/sites/default/files/Monitor_Tipsheet_2013_508%20FINAL.pdf
NDTAC’s Resources on Subgrantee Monitoring (cont.)

2014–15 Topical Call Series on Subgrantee Monitoring Tools

Call 1: http://www.ndcommunities.org/calls/subgrantee-monitoring-tools-call-1
Reporting and Evaluation
What Is the Consolidated State Performance Report (CSPR)?

• CSPR is a data-collection instrument administered annually by ED’s Office of Elementary and Secondary Education.
• The required measures for Title I, Part D can be found in CSPR section 2.4. and include the following:
  – Demographic data of students
  – Data on transition services
  – Academic/vocational achievement data
  – Reading and math performance data
What Is EDFacts?

- EDFacts is an ED initiative to collect, analyze, report on, and promote the use of high-quality performance data.
- Most of the Title I, Part D data are now reported through EDFacts.
- Eventually, all CSPR data will be reported through the EDFacts’ online Education Data Exchange Network Submission System.
How ED Will Use the CSPR Data (GPRAMA)

<table>
<thead>
<tr>
<th>Percent of students who are N or D and</th>
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<tbody>
<tr>
<td>Earned high school course credits</td>
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<tr>
<td>Obtained diploma or diploma equivalent</td>
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<th>Percent of long-term students who</th>
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<tbody>
<tr>
<td>Improved in mathematics</td>
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<tr>
<td>Improved in reading</td>
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<tr>
<th>Efficiency measure</th>
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<tbody>
<tr>
<td>Amount of funding per diploma or diploma equivalent</td>
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Part D Coordinator Responsibilities: Reporting and Evaluation

Understanding the requirements related to data and reporting

- Be familiar with the CSPR measures
- Know your State’s reporting requirements
- Understand the Federal reporting cycle
Facilitating the data reporting processes and focus on data quality

- Identify the programs receiving funds
- Develop relationships with the data contacts in your State
- Establish reporting timelines
- Review the data you receive, and assess the quality
- Provide training
Part D Coordinator Responsibilities: Reporting and Evaluation (cont.)

Using the data you collect

- Analyze data for program quality improvement
Common Administrative Challenge: Reporting and Evaluation

Group exercise
At your table, discuss the following scenario(s):

1. A subgrantee has not provided some or all CSPR data for the most recent school year. What is your response?

2. A subgrantee has consistently shown poor student outcomes. How do you address this?
Common Administrative Challenge: Reporting and Evaluation (Scenario 1)

NDTAC encourages you to consider:

• What additional TA or tools might this facility need to collect and report CSPR data?
• Do you need to put a corrective action plan in place? When planning a corrective action to address missing data in upcoming CSPR data collection, you will want to
  – Document the corrective action clearly
  – Create benchmarks that indicate progress
  – Allow sufficient time for the facility to make the necessary changes
NDTAC encourages you to consider:

- Are low student outcomes for this facility something new or a trend?
  - Are these outcomes what you would expect from the population served by that facility?
- Is the issue poor data system reporting?
  - Is there data missing?
- Review the application of the subgrantee to see how the funds are used.
- Review the most recent monitoring of this subgrantee.
  - How recently have you monitored this subgrantee?
  - Were there any findings in the most recent monitoring review?
- Has the subgrantee set SMART goals relating to student outcomes?
NDTAC’s Resources on Reporting and Evaluation

- Latest updates for the CSPR data collection
- Review of data collection process
- Details about the CSPR and the EDFacts initiatives
- Comprehensive reporting instructions

NDTAC’s Resources on Reporting and Evaluation (cont.)

- Title I, Part D Data Collection List for SY 2014–15
- Title I, Part D Data Collection and Submission Timeline for SY 2014–15
- Checklists for Performing Data Quality Reviews of Title I, Part D Data
- Reporting Tool: Creating a Weighted Average Length of Stay
- Reporting Tool: Collecting and Reporting Racial Ethnic Data in Seven Categories
- Reporting Tool: Reporting Complete Pre- and Posttest Results for Reading and Mathematics
Resources Available for Addressing Administrative Challenges of Implementing Title I, Part D
NDTAC can provide:

- Numerous products and resources
- References to statute and nonregulatory guidance
- Access to experts in the field
- Examples from other peers
ND Community Peer-to-Peer Support

- Quarterly ND community calls
- Topical call series
- ND communities Web site (http://www.ndcommunities.org)
  - State coordinator contact information
  - Topical and community call recaps and recordings
  - State-developed resources