

# TITLE I, PART D, FEDERAL MONITORING BASICS

During FY 2003–04, the United States Department of Education’s (ED’s) Student Achievement and School Accountability Office (SASA) began to use a new framework to monitor formula grant programs being administered by States and territories through their respective State Education Agencies (SEAs), including Title I, Part D.<sup>1</sup> The new framework, which was designed to align with the principles of the Elementary and Secondary Education Act, as amended in 2001 (also known as the No Child Left Behind Act or NCLB), includes indicators that allow SASA to monitor the implementation of the program and the use of Federal funds in three areas: (1) standards, assessment, and accountability; (2) instructional support; and (3) fiduciary.<sup>2</sup> Table 1 describes the indicators SASA currently uses by area.

**Title I, Part D**, of NCLB—also called The Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk—provides financial assistance to educational programs for youth in State-operated institutions and community day programs. The program also provides financial assistance to support school districts’ programs involving collaboration with locally operated correctional facilities. The goals of Title I, Part D, are to (1) improve educational services for these children so they have the opportunity to meet challenging State academic content and achievement standards; (2) provide them with services to successfully transition from institutionalization to further schooling or employment; (3) prevent at-risk youth from dropping out of school; and (4) provide dropouts and children and youth returning from correctional facilities with a support system to ensure their continued education. Title I, Part D, programs must comply with respective [statutory requirements](#).

**Table 1: SASA, Title I, Part D, Indicators for Monitoring Compliance**

Monitoring Area	#	Level	Description
Standards, Assessment, and Accountability	1.1	State Agency (SA) and Local Education Agency (LEA)	The SEA monitors and evaluates its subgrantees to ensure compliance with Title I, Part D, program requirements and progress toward Federal and State program goals and objectives.
Instructional and Program Support	2.1	SA	The SEA ensures that SA programs for eligible students meet all requirements, including facilities that operate institutionwide projects (IWPs).
	2.2	LEA	The SEA ensures that LEA programs for eligible students meet all requirements.
Fiduciary	3.1	SA	The SEA ensures that each SA complies with statutory and other regulatory requirements that govern State administrative activities; provides fiscal oversight of the grants, including reallocations and carryover; ensures reserve funds for transition services for subgrantees; and demonstrates fiscal maintenance of effort and requirements to supplement, not supplant.
	3.2	LEA	The SEA ensures that each LEA complies with statutory and other regulatory requirements that govern State administrative activities and provide fiscal oversight of the grants—including reallocations, carryover, and allowable uses of funds.

<sup>1</sup> Formula grants are distributed to SEAs in all 50 States, the District of Columbia, and Puerto Rico. SEAs are interchangeably referred to as “SEAs” and “States” throughout this guide.

<sup>2</sup> Beginning in FY 2009–10, SASA reorganized its original six indicators into five indicators to better align with SASA’s other programs. Despite the change, the content of the indicators remains largely unchanged. Appendix A compares both sets of indicators. Throughout this guide, the original indicators are referred to as “former indicators” or “former Indicator #.#” and the others are referred to as the “current indicators” or “currently Indicator #.#.”

## FREQUENCY OF FEDERAL MONITORING REVIEWS

SASA staff monitor approximately 18 States each FY for their compliance with the statute and regulations of Title I, Part D. States are selected for monitoring based on a number of factors, including:

- When they were last monitored
- Whether they have received recurring findings over two reviews or clusters of findings during their most recent monitoring reviews
- Whether ED has flagged risk factors for other SASA or ED programs within the State (if so, the State will be monitored for Title I, Part D, as well)
- Size of their funding allocations

Typically, States are monitored every 2–3 years.

## STRUCTURE OF A FEDERAL MONITORING REVIEW

Each review involves (1) a comprehensive desk review of documents the SEA is asked to submit and (2) interviews with the SEA, all SA subgrantees, and a selection of LEA subgrantees that entail additional review of documentation and program implementation across a State.<sup>3</sup> The interviews occur remotely via video conference or in-person during an onsite review that occurs simultaneously with the Title I, Part A, onsite review.<sup>4</sup> States are selected for onsite monitoring reviews based on the same factors described above.

## FEDERAL MONITORING RESULTS

After each review, SASA prepares a monitoring report that includes an Indicator Summary Table with a list of the indicators and their status. Each indicator receives one or more of the following three status assessments:

1. **Met Requirements.** This indicates that the State has fulfilled all requirements for this indicator, and no action is required on behalf of the State.
2. **Recommendation.** This indicates that SASA *recommends* a certain action to improve programming. The State is not necessarily required to implement the recommendation.
3. **Finding.** This indicates that the State is not fulfilling a requirement of the Title I, Part D, law. The monitoring report cites the part of the law that is not being upheld and indicates required action(s) to be taken by the State to address the issue. In this case, the State must take steps to rectify the problem.

States usually receive the SASA monitoring report a few months after the review is completed. If a State receives any findings, the State must project a timeline for SASA regarding the completion of corrective actions and describe how it will be done within 1 year.

For more details about the basics of the Title I, Part D, Federal monitoring process, refer to the [SASA Monitoring Plan for Formula Grant Programs](#).

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<sup>3</sup> If a State does not participate in the Title I, Part D, Subpart 2, program—that is, does not submit a child count for Subpart 2 or does not accept applications and awarding funds—then SASA will only review the State’s Subpart 1 program. SASA will not interview any LEA staff in relation to Title I, Part D.

<sup>4</sup> Appendix B includes the guiding questions that SASA asks and acceptable evidence they seek for each Title I, Part D, indicator during a monitoring review.