

ANALYSES OF TITLE I, PART D, FEDERAL MONITORING REVIEWS, FY 2003–04 THROUGH 2007–08

One way to help prepare for a Federal monitoring review is to understand the results of previous reviews and the types of issues that have been identified. Part D Coordinators can use this information to inform and examine activities in their States.

The following section presents results from analyses of monitoring reviews that took place from FY 2003–04 to 2007–08 based on the former six indicators used during that period of time. Although the indicators subsequently have been revised, these analyses remain relevant because the former and current indicators are based on the same statute and the patterns and issues that arose in the analyses are still applicable. Appendix A compares both sets of indicators.

STATE MONITORING RESULTS: A 5-YEAR PERSPECTIVE

Since SASA began using the new monitoring framework in FY 2003–04, 50 State Title I, Part D, programs were reviewed *at least once* between FY 2003–04 and 2007–08. The majority of States were reviewed between FY 2005–06 and 2007–08, and 21 States were reviewed twice within the 5-year period (Table 2).

Table 2: Monitoring Schedule Since New Framework, FY 2003–04 Through 2007–08

FY 2003–04	FY 2004–05	FY 2005–06	FY 2006–07	FY 2007–08
2 Reviews	17 Reviews	20 Reviews	15 Reviews	17 Reviews
CA and MN	AL, AZ, CO, FL, ID, IL, IN, MD, NV, NM, NC, ND, PA, TX, VA, WA, and WI	AK, AR, DE, DC, GA, HI, KS, KY, MS, NH, NY, OK, OR, PR, SC, TN, UT, VT, WV, and WY	CA, CT, IA, IN , ME, MA, MI, MO, MT, <u>NV</u> , NJ, OH, RI, SD, and <u>WA</u>	AL, AZ, CO, DE , FL, ID, IL, MD, MN, NC, ND, NM, <u>OK</u> , PA, TX, VA, and WI

NOTE: States in bold indicate that the State was reviewed for a second time using the new framework. States that are underlined indicate that the State was reviewed 2 years after its initial monitoring review.

Overview of Monitoring Findings and Recommendations

Based on the results of each State’s most recent Title I, Part D, Federal monitoring review during the 5-year period, SASA issued 78 findings to 34 States and 31 recommendations to 24 States (Table 3).

Table 3: Number of Findings and Recommendations Based on Each State’s Most Recent Review

Type of Monitoring Result	Number	Number of States With at Least One Finding/Recommendation
Findings	78	34
Recommendations	31	24

Summary of Monitoring Findings

Of the 50 States reviewed, the majority (68 percent) received at least one finding during its most recent monitoring review during the 5-year period. Of the 34 States that received findings, more than one-third (38 percent) received a finding for just one indicator and only a handful of States (17 percent) received findings for 4 of the 6 former indicators. No State received a finding for five or more of the former indicators (Table 4).

Table 4: Number and Percent of States That Received a Finding, by Number of Indicators

States With No Findings		States With Findings for 1 Indicator		States With Findings for 2 Indicators		States With Findings for 3 Indicators		States With Findings for 4 Indicators	
#	%	#	%	#	%	#	%	#	%
16	32	13	26	10	20	5	10	6	12

Summary of Monitoring Recommendations

Unlike the results for monitoring findings, of the 50 States most recently reviewed during the 5-year period, the majority (52 percent) did not receive any recommendations. Of the 24 States that received recommendations, nearly all States (87 percent) received a recommendation for only one indicator (Table 5).

Table 5: Number and Percent of States That Received a Recommendation, by Number of Indicators

States With No Recommendations		States With Recommendations for 1 Indicator		States With Recommendations for 2 or More Indicators	
#	%	#	%	#	%
26	52	21	42	3	6

Most Commonly Cited Indicators

Overall, States received more findings and recommendations on certain indicators than others. States received the most **findings** on the following three indicators:

- Subgrantee Monitoring, former Indicator 3.2 (56 percent)
- SA Application, former Indicator 1.2 (32 percent)
- Transition Reservation, former Indicator 3.1 (30 percent)

Similarly, States received the most **recommendations** on the following three indicators:

- SA Application, former Indicator 1.2 (18 percent)
- Subgrantee Monitoring, former Indicator 3.2 (16 percent)
- LEA Application, former Indicator 1.3 (10 percent)

Table 6 summarizes the number of findings and recommendations per indicator.

Table 6: Number and Percent of States That Received a Finding or Recommendation, by Result and Indicator

Type of Monitoring Result	Former 1.1: State Plan		Former 1.2: SA Application		Former 1.3: LEA Application		Former 2.1: Institution-Wide Projects		Former 3.1: Transition Reservation		Former 3.2: Subgrantee Monitoring	
	#	%	#	%	#	%	#	%	#	%	#	%
Findings	4	8	16	32	3	6	6	12	15	30	28	56
Recommendations	2	4	9	18	5	10	2	4	3	6	8	16

NOTE: Five States received more than one finding for former Indicator 1.2. One State received more than one finding for former Indicator 3.2. One State received more than one recommendation for former Indicator 3.2.

The next part of this overview examines each of the former indicators in greater depth and provides more context for the findings and recommendations received by States.

Indicator-Specific Summaries

The analyses uncovered commonalities in the types of issues that led to States receiving a finding or recommendation. The results are summarized by indicator below. (Appendix C contains data tables that provide detailed results.)

Standards, Assessment, and Accountability Indicators

Former Indicator 1.1: The SEA has implemented all required components as identified in its Title I, Part D, N or D plan (State Plan). Six States (12 percent) received findings and recommendations for Indicator 1.1. The findings and recommendations involved two primary issues:

1. **Whether the content of the State Plan adhered to Federal guidelines.** In these instances, State Plans were indicated as being problematic because States either insufficiently or improperly identified their goals; insufficiently described their activities and/or services, such as funding provisions for transition services; or used out-dated language.
2. **The extent to which States implemented their State Plan.** State Plan implementation issues involved inappropriate allocation of Part D funds or lack of alignment between the content of the plan and how program activities were being conducted.

Former Indicator 1.2: The SEA ensures that SA applications for services to eligible N or D students meet all requirements (SA Application). Sixteen States (32 percent) received findings and nine States (18 percent) were given recommendations related to the SA Application. Of the 16 States with findings, 5 (31 percent) received two findings for this indicator. The findings and recommendations involved two primary issues:

1. **Not addressing all 19 required elements in the SA Application per the statute requirements of Title I, Part D.** The majority (87 percent) of findings and recommendations dealt with the SA application lacking all 19 required elements. In particular, the following six elements often were covered insufficiently or not included: parental involvement, the existence of a transition coordinator, SA/SEA monitoring, the fiscal maintenance effort of SAs, academic instruction requirements, and professional development.
2. **Problems with the SA/SEA application process.** Problems with the SA application process included using an inappropriate application, not having evidence that the application had been approved by the SEA, and not using an application to allocate funds.

Former Indicator 1.3: The SEA ensures that LEA applications for services to eligible N or D students meet all requirements (LEA Application). Three States (6 percent) received findings, and five States (10 percent) received recommendations around the LEA Application. The findings and recommendations involved the following issues:

1. **Insufficient oversight of LEA subgrantees.** The majority (50 percent) of findings and recommendations dealt with States providing insufficient support to subgrantees. SASA suggested that SEAs communicate better with their subgrantees so that they are aware of SEA and SASA requirements.
2. **Problems with the application process and identification of LEAs.** States with these problems either administered applications that did not meet statutory requirements or did not sufficiently identify and invite LEAs that serve students with the greatest needs to complete an application.
3. **Faulty data collection.** An SEA improperly counted students for the Annual Count. SASA required the State to follow ED's directives for the next count.

Instructional Support Indicators

Former Indicator 2.1: The SEA ensures that IWPs (Institutionwide Projects) developed by the SA under Subpart 1 use the flexibility provided to them by law to improve the academic achievement of all students in the school (Institutionwide Projects). Eight States (16 percent) received findings and recommendations related to institutionwide projects. States who were cited under Indicator 2.1 faced problems related to the following issues:

1. **Insufficient monitoring of existing IWPs.** States with this issue were not sufficiently monitoring and ensuring the successful implementation of IWPs, including compliance with the submitted plan. For example, one Subpart 1 grantee was operating an IWP in a facility without the knowledge of the SEA.
2. **Problems with IWP plans.** In this instance, SEAs were found to be negligent in providing subgrantees with an opportunity to submit information related to IWPs on grant applications or for ensuring that each IWP submitted a plan.
3. **Insufficient training and technical assistance to SAs.** States received either a finding or recommendation to provide greater training and technical assistance to SAs on the benefits, requirements, and flexibility of IWPs.

Fiduciary Indicators

Former Indicator 3.1: The SEA ensures that the SA has not reserved less than 15 percent and not more than 30 percent of its allocation for transition services (Transition Reservation). Fifteen States (30 percent) received findings, and three States (6 percent) received recommendations about transition reservation. The findings and recommendations concerned the following four issues:

1. **Insufficient evidence of reserving funds for transition.** The largest proportion of findings and recommendations (44 percent) focused on the SEA's ability to provide evidence that SAs were meeting the transition reservation requirement. To clarify how much and which activities were covered by the reservation, SASA requires States to ensure that SA applications include a section for a budget breakdown of each facility or program that received Title I, Part D, Subpart 1, funds.
2. **Not enforcing requirements to reserve funds or reserving insufficient funds for transition.** States with these problems had either not required their SAs to reserve funds for transition or, based on evidence they provided, revealed they did not reserve a sufficient amount.
3. **Questionable use of the transition reservation.** In this instance, a State had reserved a sufficient amount of funds for transition but did not ensure that the services met the needs of all youth transitioning out of N or D institutions.
4. **Inappropriate oversight of transition reservations.** SEAs in States with findings in this category were inappropriately overseeing institutions' reservations of transition funds: SAs should oversee the transition reservation.

Former Indicator 3.2: The SEA sufficiently monitors subgrantees to ensure compliance with the Title I, Part D, program requirements (Subgrantee Monitoring). Twenty-eight States (56 percent) received findings, and eight States (16 percent) received recommendations about subgrantee monitoring. Unlike the other indicators, a substantial portion of States (28 percent) received findings for this indicator that dealt with more than one issue.

Reports indicated whether the monitoring problems existed in Subparts 1 (SAs) and/or 2 (LEAs). The majority of States (50 percent) had problems monitoring SAs with Subpart 1 programs, and 43 percent had problems monitoring both Subparts 1 and 2. Five main issues led to the findings:

1. **No evidence of subgrantee monitoring.** The largest proportion of findings (30 percent) dealt with States not having evidence (e.g., schedule, protocol, postmonitoring reports) that they monitored all or some of their subgrantees (e.g., monitored all but one State agency).
2. **Insufficient subgrantee monitoring.** States with this problem only collected data and reviewed annual applications, just provided technical assistance to subgrantees, did not monitor subgrantee compliance in all areas, and/or did not provide postmonitoring results to their subgrantees or implement corrective action processes.
3. **Use of informal and unsystematic monitoring protocols.** Although several States had subgrantee monitoring protocols and schedules, some States did not use the protocols and schedules in a formal or systematic manner. In a few cases, the protocol was not suitable (e.g., used protocol for Subpart 2 when it was most appropriate for Subpart 1) or specific to Title I, Part D.
4. **Faulty data collection processes.** One SEA did not submit its Consolidated State Performance Report (CSPR) data, and another SEA did not ensure the accuracy of its CSPR data because of an informal process of data collection.
5. **Insufficient use of program evaluation information.** One SEA did not use evaluation information to plan and improve programs despite having found a significant issue to address.

In contrast to the findings, recommendations for former Indicator 3.2 focused on how States could improve specific aspects of their monitoring systems, including using additional tools—such as an annual evaluation form and/or data from CSPRs, strengthening monitoring processes (e.g., tracking students after exiting a facility, providing more technical assistance), and planning for the future (e.g., focus on awarding more high school diplomas).

PROGRESS OF STATES THAT HAVE BEEN MONITORED TWICE UNDER THE NEW SASA MONITORING FRAMEWORK BETWEEN FY 2003–04 AND 2007–08

By the end of FY 2007–08, 21 States (42 percent) had been reviewed twice (see bolded States in Table 2) under the monitoring framework using the six former indicators. During each of these reviews, the expectations and reviewing criteria were the same.

In comparison to the previous review:

- Nearly one-half (47 percent) of States received fewer findings
- One-third (33 percent) of States received the same number of findings
- Less than one-fifth (19 percent) of States received more findings

In relation to recommendations:

- Nine States (43 percent) received fewer recommendations
- Seven States (33 percent) received the same number of recommendations; and
- Five States (24 percent) received more recommendations.

Table 7 summarizes the number of findings and recommendations, compared with the previous review, in States that had been reviewed twice under the new monitoring framework.

Table 7: Number and Percent of States That Were Reviewed Twice Under the New SASA Monitoring Framework, by Result and Quantity of Results, Compared With Previous Review

Type of Monitoring Result	Fewer Results		Same Number of Results		More Results	
	#	%	#	%	#	%
Findings	10	47	7	33	4	19
Recommendations	9	43	7	33	5	24

Notably, two States (10 percent) showed substantial improvements (i.e., resolved findings for three to five indicators since the previous review), and three States (14 percent) showed moderate improvements (i.e., resolved findings for two indicators since the previous review).

Summary of Monitoring Findings Over Time

When examining the overall results by indicator among the States that received findings, most States received fewer findings than the previous review (Table 8). For example, every State that received a finding for LEA Application (former Indicator 1.3) during the first review did not receive any findings for that same indicator during the second review. However, for States that did not receive fewer findings, they were more likely to receive a greater number of findings in the second review than to receive the same number of findings.

The indicators in which States received more findings in the second review reflected the same indicators for which States usually receive findings: SA Application, Transition Reservation, and Subgrantee Monitoring (former Indicators 1.2, 3.1, and 3.2, respectively).

Table 8: Number and Percent of States That Were Reviewed Twice Under the New SASA Framework, by Indicator and Whether They Had More or Fewer Findings on the Second Review Than on the First Review

Level of Improvement	Former 1.1: State Plan		Former 1.2: SA Application		Former 1.3: LEA Application		Former 2.1: IWPs		Former 3.1: Transition Reservation		Former 3.2: Subgrantee Monitoring	
	#	%	#	%	#	%	#	%	#	%	#	%
Fewer Findings	2	9	5	24	3	14	1	5	6	29	8	38
Same Number of Findings	0	0	1	5	0	0	0	0	0	0	2	9
More Findings	1	5	3	14	0	0	3	14	3	14	4	19

NOTE: Two States received the same finding for both reviews.

When focusing on the actual findings that States received, as opposed to the number of findings by State, a slightly different picture arises. Thirty-two of the 34 findings (94 percent) from the first review were rectified by the time States were reviewed a second time. During the second review, 14 new findings were issued that fell under different indicators from what the States had received during the first review. Four States received findings for the same indicator but for different issues, and two States did not rectify a specific issue that was identified in the first review.

Summary of Monitoring Recommendations Over Time

Like the pattern of findings by indicator, a larger proportion of States received fewer recommendations per indicator after the second review (with the exception of increased recommendations for Subgrantee Monitoring—former Indicator 3.2) (Table 9). For States that received more recommendations in the second review, they were focused on 3 of the 6 former indicators: SA Application, Transition Reservation, and Subgrantee Monitoring (former Indicators 1.2, 3.1, and 3.2, respectively). These indicators also have the most recommendations in general. In contrast, no State received more recommendations for SEA Plan or IWPs (former Indicators 1.1 and 2.1, respectively).

Table 9: Number and Percent of States That Were Reviewed Twice Under the New SASA Framework, by Indicator and Whether They Had More or Fewer Recommendations on the Second Review Than on the First Review

Level of Improvement	Former 1.1: State Plan		Former 1.2: SA Application		Former 1.3: LEA Application		Former 2.1: IWPs		Former 3.1: Transition Reservation		Former 3.2: Subgrantee Monitoring	
	#	%	#	%	#	%	#	%	#	%	#	%
Fewer Recommendations	2	10	3	14	3	14	1	5	4	19	3	14
More Recommendations	—	—	2	10	1	5	—	—	3	14	5	24

NOTE: Three States received a recommendation during the second review but not during the first. Six States did not receive a recommendation during the second review after receiving one during the first.

SUMMARY OF ANALYSES

The review of the Title I, Part D, program monitoring results since SASA began implementing its new framework using the original six indicators, identified several patterns:

- Particular indicators systematically generated more findings than others: Subgrantee Monitoring (former Indicator 3.2), SA Application (former Indicator 1.2), and Transition Reservation (former Indicator 3.1).
- For States that received findings, common issues prevented them from meeting requirements:
 - **State Plan (former Indicator 1.1).** Goals and services were not described in a comprehensive and complete fashion. Program implementation did not match the content of the State Plan.
 - **SA Application (former Indicator 1.2).** SA Applications did not address all required elements. Application processes were insufficient during application development and administration.
 - **LEA Application (former Indicator 1.3).** LEA Applications did not address all required elements. Application processes were insufficient during application development and administration.
 - **IWPs (former Indicator 2.1).** IWP applications were not being submitted separately (by institution). SEAs provided only limited evidence of IWP application processes and offered insufficient training and technical assistance to SAs on how to monitor IWPs.
 - **Transition Reservation (former Indicator 3.1).** Some States were not reserving a sufficient percentage of allocations, if at all, for transition. Evidence of the transition reservation was often insufficient.
 - **Subgrantee Monitoring (former Indicator 3.2).** States often lacked appropriate monitoring tools. Subgrantees were not sufficiently monitored. Data collection processes were faulty.
- Most States (94 percent) successfully resolved findings from the first review by the second review, thereby making important programmatic improvements.
- Despite the recent reorganization of SASA indicators for the Title I, Part D, program, the content and patterns of the findings and recommendations issued between FY 2003–04 and 2007–08 are relevant and should be considered by States as they prepare for upcoming Federal monitoring reviews.