



**The National  
Evaluation and  
Technical  
Assistance Center**

for the  
Education of Children and Youth  
Who Are Neglected, Delinquent  
or At-Risk (NDTAC)



## **Compliance Isn't Built In A Day: The Importance of Ongoing Communication in Subgrantee Monitoring**

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[www.neglected-delinquent.org](http://www.neglected-delinquent.org)

## **Why Subgrantee Monitoring Is Important**

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- Subgrantee monitoring is required  
(Title I, Part D, Nonregulatory Guidance: [F-1](#), [G-11](#), [Q-1](#)) 
- The requirements are the backbone of the program
- Compliance is possible for subgrantees 



**Most States and subgrantees interpret the  
requirements as having to conduct/participate in  
onsite monitoring review process(es).**

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## Like Rome, Compliance Isn't Built In A Day

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- Reviews tend to be short and infrequent
- Staff turnover tends to be high
- Requirements can be challenging to understand

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## Approach to Overcome Common Challenges in Subgrantee Monitoring

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- Ongoing Communication
  - Process of message transaction between people to create shared meaning:
    - Process
    - Message exchange
    - Shared meaning



(West, R., Turner, L. 2009. Understanding Interpersonal Communication: Making Choices in Changing Times).  
Boston: Cengage Learning)

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## When to Communicate

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- During onsite monitoring review process
  - In preparation for onsite monitoring review
  - During onsite monitoring review
  - After onsite monitoring review
- Between onsite monitoring reviews
  - Formal
    - Desk monitoring process
    - Regular conferences/meetings
  - Informal
    - Follow-up calls/emails



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## What to Communicate on an Ongoing Basis

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- Subgrantee Monitoring Basics
  - Schedule of onsite and remote/desktop monitoring
  - Onsite and remote monitoring protocols
  - Corrective action plan process
  - Resources to help achieve or maintain compliance
- Title I, Part D, requirements
  - Administrative
  - Implementation
  - Evaluation
  - Distinction between Subparts 1 and 2



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## How to Communicate on Ongoing Basis

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- Add/expand current monitoring activities
- Follow-up on compliance issues
  - Conduct/follow-up on corrective action plans
  - Take notes on issues each subgrantee has/you have and touch base with subgrantee representative/SEA during face-to-face meetings or via email
- Collaborate with other program monitoring activities
- Integrate compliance issues into regular communications and activities
  - Annual Count meeting
  - Subgrantee application process
  - CSPR meeting/webinar



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## Ongoing Communication Strategies from the Field

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- Wyoming
  - Use monitoring results and input from subgrantees to host regular conferences and provide targeted TA
- Florida
  - Implement a desk monitoring and self-certification process between onsite monitoring reviews



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