



**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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**Introductory Remarks
Simon Gonsoulin
Director, NDTAC**

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About NDTAC

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- **Neglected-Delinquent TA Center (NDTAC)**
- **Contract between U.S. Department of Education and the American Institutes for Research**
 - John McLaughlin
Federal Coordinator, Title I, Part D, Neglected, Delinquent, or At Risk Program
- **NDTAC's Mission:**
 - Develop a uniform evaluation model
 - Provide technical assistance
 - Serve as a facilitator between different organizations, agencies, and interest groups

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Agenda and Presenters

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- I. Importance of ongoing communication in subgrantee monitoring and basic strategies
Greta Colombi, Research Analyst, NDTAC
- II. Ongoing communication strategies in Wyoming
Kenya Haynes, Title I, Part D, Program Manager, Wyoming Department of Education
- III. Question and Answer Session
- IV. Ongoing communication strategies in Florida
Melvin Herring, Title I, Part D, Program Director, Florida Department of Education
- V. Question and Answer Session

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Webinar Outcomes

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- SEAs and subgrantees will understand the importance of ongoing communication in improving subgrantee compliance.
- SEAs and subgrantees will adjust existing or institute new communication strategies to improve subgrantee compliance.
- SEAs and subgrantees will know where to turn for resources on adjusting or instituting new communication strategies.

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

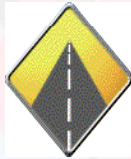
Greta Colombi, NDTAC

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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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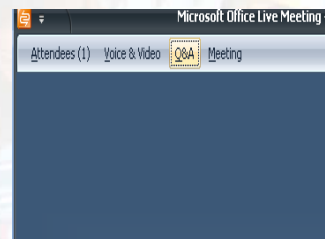


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Have a Question?

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TITLE I, PART D, PROGRAM IMPROVEMENT IN WYOMING

KENYA HAYNES, WYOMING DEPARTMENT OF EDUCATION

Monitoring as process, not event

Context

- Total Student Population: 86,519
- Number of LEAs: 48
- Median LEA size: 830 students
PK-12
- N or D Student Population: 2,299



Monitoring Cycle



- 3 Year Cycle for both subparts
- Most on-site visits last one day, larger LEAs may have a two-day visit
- Subpart 2 visits are coordinated with the other programs in the Consolidated Grant
- Subpart 1 institutions are monitored independently

Subpart 1 Story



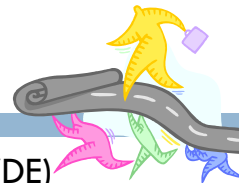
- Initial Monitoring Results
 - 31 Recommendations
 - 26 Fiscal Findings
 - 45 Program Findings
- Areas with most opportunity for improvement
 - Time/effort documentation
 - Institutionwide project planning
 - Services for English Language Learners
 - Annual Program Review

Increased Title I, Part D, Support



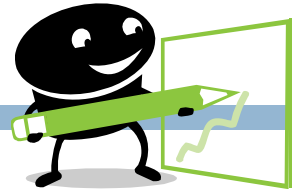
- Semi-annual face-to-face meetings
- Provision of monitoring documents annually
- Annual report of common findings
- Quarterly technical assistance for high-needs subgrantees by the SEA

Additional SEA Support



- Wyoming Department of Education (WDE) partnership with AdvancED/North Central Association (NCA-CASI) provides a school improvement specialist for each of the subgrantees.
- In 2008-09 WDE launched a district coaching program for high-needs LEAs. This year that program has been expanded to include institutional school settings. Coaching focuses not only on school improvement, but systems in general.

Results



- 2nd Monitoring Cycle Data (to date)
 - 6 Recommendations (-70%)
 - 11 Fiscal Findings (-42 %)
 - 15 Program Findings (-55%)

Contact Information



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Questions?

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Title I, Part D, Compliance Monitoring

A Constant Connection

Melvin Herring, Florida Department of Education



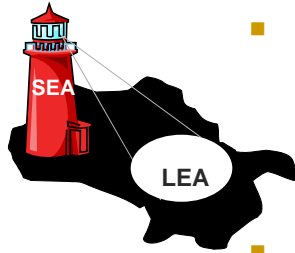
[Constant Connection]

- It is essential that the SEA consistently monitor Title I, Part D, funded programs for compliance with the Title I, Part D, Law.
- Communication is a key aspect of successful monitoring and should be prevalent throughout the process.

[Florida's Process]

- To ensure communication is present throughout the monitoring process.
 - *Workpapers* that outline individual compliance items; questions about compliance; and documents to be submitted for compliance are submitted to the subgrantees well in advance of all monitoring reviews.
 - Compliance issues are discussed during bi-monthly conference calls before, during, and after the monitoring review.
 - Compliance issues from the previous year are addressed in the design of the application for the following year.

Florida's Methods of Monitoring



- **Florida implements three methods of monitoring.**
 - Onsite Monitoring
 - Desktop Monitoring
 - Self Certification Evaluation
- **Onsite monitoring gives SEAs the best view of the day-to-day operations of an N or D program and allows them to easily recognize compliance issues.**

Florida's Monitoring Process

- All of Florida's educational agencies, or subgrantees, are placed in a five-year rotation schedule.
- Subgrantees that are in the current year's group are selected for onsite or desktop monitoring. This selection is dependent upon a risk factor analysis.
- In order to maintain constant connection all subgrantees not in the current year's group are required to complete self certification evaluation.

Florida's 5-year Monitoring Schedule

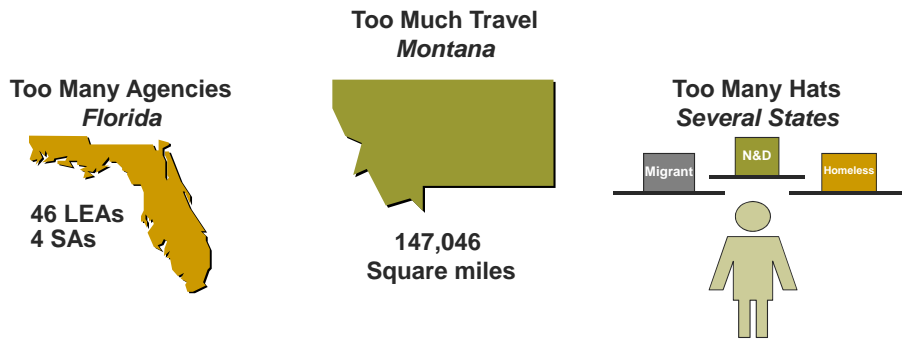
Five Year Monitoring Schedule for 2009-2014

2009-2010	2010-2011	2011-2012	2012-2013	2013-2014
Bay	Escambia	Columbia	Wakulla	UF Lab School
Gadsden	Santa Rosa	Baker	Hillsborough	Dade
Putnam	Nassau	Lake	Pinellas	Pasco
Jefferson	Duval	Orange	Gilchrist	Union
Hamilton	Volusia	Sarasota	Charlotte	Bradford
Manatee	Seminole	Desoto	Liberty	Holmes
Hardee	Martin	St. Johns	Franklin	Calhoun
Highlands	St. Lucie	FSDB	FAU Lab	Citrus
Polk	Palm Beach	FSU Lab	Levy	Hernando
Gulf	Osceola	FAMU Lab	Marion	Monroe
Jackson	Okeechobee	Broward	Clay	Collier
Taylor	Madison	Glades	Indian River	Lee
Brevard	Suwannee	DOC	Flagler	Alachua
Leon	Dozier	Okaloosa		Lafayette
	Dozier II	Walton		Dixie
	Okeechobee Boys School	Hendry		Sumter
	Washington			

Difficulties of Onsite Monitoring

- During onsite monitoring the SEA physically visits the N or D programs which may include:
 - Interviewing the Local Title I, Part D, coordinator
 - Visiting programs served by Title I, Part D

It may be difficult to cover all agencies for many reasons



[Desktop Monitoring]

- Subgrantees submit documentation to the SEA to prove compliance using Florida's online monitoring system.
- The SEA determines whether or not the documentation is sufficient for compliance.

[Florida's Desktop Process]

- Subgrantees receive *Workpapers* well in advance of the documentation submission deadline.
- Program director conducts conference calls with subgrantees in order to walk-through documentation requirements
- Subgrantees submit answers to the compliance questions and compliance documentation using Florida's Online Monitoring System.

Florida's Desktop Process

Sample Workpaper

Compliance Item AID2-3: Any Local Educational Agency (LEA) that receives funds under this subpart shall ensure that formal agreements or contracts with correctional facilities comply with all elements in section 1425 of the NCLB Law. *Section 1425(1), P.L.107-110*

Finding(s)

The LEA should:

ensure that formal agreements or contracts with correctional facilities comply with all elements in section 1425 of the NCLB Act.

Review Question(s)

How did the LEA ensure that formal agreements or contracts with correctional facilities comply with all elements in section 1425 of the NCLB Law?

Documents to Support Compliance

Formal Agreements: Evidence that the LEA has formal agreements with correctional facilities that comply with all 11 elements in section 1425 of the NCLB Law including at least one of the following:
 actual formal agreements with all 11 elements highlighted; and/or
 addendums to all formal agreements that ensures compliance with the 11 elements

Florida's Desktop Process

Sample Documentation

COOPERATIVE AGREEMENT
 BETWEEN THE SCHOOL BOARD OF HAMILTON
 COUNTY, FLORIDA
 AND
 THE DEPARTMENT OF JUVENILE JUSTICE
 ATTACHMENT B
 FORMAL AGREEMENTS

In compliance with PL 107-110, Section 1423, we agree to meet all the requirements of PL 107-110, Section 1425, as follows:

(1) where feasible, we will ensure that educational programs in the correctional facility are coordinated with the student's home school, particularly with respect to a student with an individualized education program under part B of the Individuals with Disabilities Education Act;

(2) if the child or youth is identified as in need of special education services while in the correctional facility, we will notify the local school of the child or youth of such need;

(3) where feasible, we will provide transition assistance to help the child or youth stay in school, including coordination of services for the family, counseling, assistance in accessing drug and alcohol abuse prevention programs, tutoring, and family counseling;

Cooperative Agreement Review Report
 Section 1425:

(1) where feasible, we will ensure that educational programs in the correctional facility are coordinated with the student's home school, particularly with respect to a student with an individualized education program under part B of the Individuals with Disabilities Education Act;

Compliance:
 Yes No Reviewed by: _____

(2) if the child or youth is identified as in need of special education services while in the correctional facility, we will notify the local school of the child or youth of such need;

Compliance:
 Yes No Reviewed by: _____

(3) where feasible, we will provide transition assistance to help the child or youth stay in school, including coordination of services for the family, counseling, assistance in accessing drug and alcohol abuse prevention programs, tutoring, and family counseling;

Compliance:
 Yes No Reviewed by: _____

[Certified Self-Monitoring]

- Subgrantees collect documentation to prove compliance.
- Subgrantee head certifies compliance and reports certification to SEA using the Self Certification Evaluation.

****Responsibility is placed on the subgrantee head.****

[Florida's Self Certification Process]

- Subgrantees receive *Workpapers* well in advance of the Self Certification Evaluation submission deadline.
- Program director conducts a conference call with subgrantees in order to walk-through documentation requirements
- Superintendents certify compliance with each item by completing a self certification survey.
- Completed surveys are submitted to the SEA.

Florida's Self Certification Process

- Methods Ensure Self Certification
 - Annual Internal Monitoring
 - Individual Program or LEA level staff conducting mock monitoring visits on all N or D programs within the state
 - Annual compliance monitoring by external parties
 - Peer monitoring

Florida's Self Certification Process

2009-2010 No Child Left Behind and Selected Florida Statute Monitoring Self-Evaluation Certificate

Local Education Agency: _____ LEA Contact: _____

In the column headed, "Contact Information," please provide the name, title, mailing address (including room/office number if applicable), telephone and fax numbers (including area code), and e-mail address of the person responsible for each program.

Program	Compliance Determination			Program Contact Information
	Requirements Met	Further Action Required (System Improvement Plans Required)	Not Applicable*	
Title I, Part A (Basic)				
Title I, Part A (Choice)				
Title I, Part C (Migrant)				
Title I, Part D, Subpart 1 (State Agency N&D)				
Title I, Part D, Subpart 2 (Local Agency N&D)				
Title II, Part A (Teacher & Principal Training)				
Title II, Part D (Balancing Education Through Technology)				
Title III, Part A (English Language Acquisition)				
Title IV, Part A (Safe & Drug-Free)				
Title VI, Part B (Rural & Low-Income)				
Title X, Part C (Homeless)				

*If not applicable because the LEA does not participate in this program, please indicate this. (Not Applicable is not an option for Title IV, Part A and Title X, Part C, even if the LEA does not receive funding).

I, _____ (Type or Print Name of Superintendent/Designee) do hereby certify that all facts, figures, and representations reported herein are true, correct, and consistent with the requirements set forth in the No Child Left Behind Act and cited sections of the Florida Statutes. Furthermore, all applicable statutes, regulations, procedures, and administrative requirements have been implemented to ensure proper accountability for the expenditure of funds. All records necessary to substantiate these requirements will be available for review by appropriate federal and state personnel.

Signature of Superintendent/Designee _____ Date _____

Contact Information

Melvin L. Herring, III
Program Director, Title I, Part D
Florida Department of Education
(850) 245-0684
melvin.herring@fldoe.org

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