# CoP 3 April Meeting Summary

Friday, April 29, 2022 12:00 PM - 1:20 PM EST

**Topic:** Monitoring Your Subgrantees

**Facilitator:** Michaela Rizzo

**Notetaker:** Victor St. John

**Additional NDTAC Representatives:** Lynn Bauer

**Attendees:** Laura Popp, Simone Lynch, Meghan Richert, Paula Harris, and Fran Stromberg

This CoP session focused on how SCs can prepare for monitoring their subgrantees as well as their own federal monitoring as it relates to subgrantee monitoring. Michaela reviewed the statute on NDTAC’s main website, and discussed possible monitoring questions that ED will ask SEAs, and what you may need from your subgrantees to properly answer those questions.

## Housekeeping

Michaela provides some updates to the group

* 2022 NDTAC Annual Conference is quickly approaching! The conference will take place on May 23rd, 24th, and 26th. Registration links for SCs have been shared on 04/28/22. You are encouraged to welcome to forward that link to anyone you would like to attend.
* The next CoP will take place in June. The topic for this session will be “Preparing Your Subgrantees for Data Collection.”
* The last CoP session will occur in August. The two topics for these last sessions will be “Use of At-Risk Funding” and “Supporting Subgrantees to Conduct Needs Assessments.”
  + Coordinators may join whichever CoP session topic they feel is most relevant to them, since not all states receive Subpart 2 funding for At-Risk.
* ND Communities will soon be merging with the NDTAC Main website! This will serve as a “one stop shop” for all NDTAC’s online service offerings, by June 1st, 2022.
  + Our IT team will install a URL forwarding, so that if you click an ND Communities link, you will be redirected to the ND Communities tab on the main site.
  + After the merge, the IT team will begin adding a secure blog function, a CoP Calendar feature, and many other exciting upgrades to further encourage peer to peer sharing, as well as providing a secure space for Coordinators to communicate with one another.

## Today’s Topic: Monitoring Your Subgrantees

Prompt: What does subgrantee monitoring look like for you in your State today?

* + States mention having their monitoring protocols ready.
  + Meghan (Indiana) mentions using desktop and in-person monitoring. For example, she does desktop monitoring twice each monitoring season (i.e., Fall and Spring), as well as in-person monitoring. She also calls it a monitoring review as opposed to an audit or other words that may intimidate subgrantees.
  + Michaela shares that in Ohio, Hearcel conducts a “check-in” using a virtual survey for monitoring within his state.

**Monitoring Resources**

ED’s goal is to potentially start monitoring Fall 2022. Their monitoring protocols are under review with their legal team. The selection of states who will be monitored has not been determined yet. Today we examine how SCs can monitor their subgrantees and how they will be monitored by ED within the scope of subgrantee activities. Michaela created a list of potential questions ED may ask you in your Federal monitoring visit; these questions were created by looking at old monitoring reports that are publicly available at [OESE’s Performance Review Page](https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/performance-review/), [The OSS Title I Program Monitoring page](https://www2.ed.gov/admins/lead/account/monitoring/index.html), as well as reviewing each section in the [Title I, Part D statute on NDTAC’s searchable statute page](https://neglected-delinquent.ed.gov/title-i-part-d-statute). NDTAC has also recently completed a [Monitoring and Evaluation resource research project](https://lgvtyconsulting-my.sharepoint.com/:w:/g/personal/michaela_rizzo_longevityconsulting_com/Ee-89EniEuBKqPVKQciYgwgBc2uRizXFlLkkbPy2Td5EGw?e=DMEPLI) at the request of a State Coordinator; this word doc contains links and descriptions of monitoring protocols, templates, and other resources around Monitoring and Evaluation on all levels of TIPD (Federal, Subgrantee, and Facility).

**PLEASE NOTE:** NDTAC and our TA providers are **NOT** allowed to interpret the TIPD Statute. If you have a question about the meaning of the TIPD statute, please reach to us and we will send it up the chain directly to the TIPD program office.

## Subpart 1 SEA Assessment / Checklist

Michaela shares a breakdown of SC required monitoring activities through a review of the statute. She incorporates possible questions that may arise when a SC is monitored based on the statute and past monitoring reports, and facilitates discussion on potential documentation/evidence that SCs collect and/or may want to collect in preparation for monitoring.

* Section 1411 covers eligibility
  + SCs are required to confirm that subgrantees are eligible at the time subgrantee applications are approved
  + Subgrantees are required to maintain their own eligibility to receive funding in the next application cycle; SCs **do NOT** have to help subgrantees with maintaining eligibility throughout the year
* Section 1412 covers allocation of funds
  + Reallocation of funds is an option that SCs can determine using fiscal monitoring of subgrantees
  + Removal of funds from one program for another may happen for a variety of reasons such as changes in program needs
  + Meghan mentions wanting to switch to competitive funding allocations and shares with the group her reason with fellow group members. She explains that there can be carry over of funds / difficulty spending down, and that through a competitive process, she can ensure that people who want the funding can spend it down, and it also allows programs who receive smaller amount of funds to apply for larger amounts.
    - Their financial department sets aside TA funds, then gives a number on the amount of money available for the SC to distribute. Ongoing discussions on how to set up a process for competitive applications is underway (e.g., should we create financial caps on the amount of money that grantees can apply for? Like having a max of $10,000.
* Section 1414 covers a review of State Plans
  + Examining whether subgrantees are adhering to the State plan is another important portion. The Statute states that SCs must periodically review their state plan, and only through monitoring can an SC determine if their State plan needs to be adjusted to reflect the day-to-day of current subgrantees.
  + 3 year programs and projects are also an option, meaning SCs can approve programs or projects for up to 3 years. If 3 year program and projects are selected/approved, ED requires information on what these projects are. Suggested documentation may include updated state plans, application requirements which comes from the requirements listed in section 1414 and the bulk of this information will come mainly from subgrantees.
    - Note. [State Plan Directory on ED’s website tracks your state plans over time.](https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-consolidated-state-plans/)
    - Programs longer than 1 year triggers the subpart 1 sec.1417.
    - Note. The application process for programs funded for over a year can be approved on a rotating cycle as opposed to every year.
* Michaela provides a high-level overview of other aspects of monitoring, Use of Funds also known as fiscal monitoring is required, institution-wide projects, SA transition services, and various activities also require monitoring.

**Monitoring and Evaluation C.F.R. 1431 or Subpart 3**

* This part of the statute is primarily directed at SC subgrantees.
  + The SC must be able to prove that these items are in place.
    - E.g., disaggregation of data is a requirement of subgrantees. SCs are to ensure this is done.
  + Evaluations should be used to improve subgrantee programming and SCs should document this process.
    - For example, can SCs verify the data accuracy of subgrantees?
      * Building on this example, Laura asks what are some practices to monitor these items? Michaela gives an example of asking subgrantees to share their data validation processes that are in place.

## Subpart 2 SEA Assessment / Checklist

* + For subpart 2, SCs should have a process in place on how they identify eligible LEAs.
  + Michaela explains that SCs can determine what the high numbers or percentages are in their programs.
    - These numbers will vary based on your jurisdiction. Michaela gives an example of racial and ethnic minorities within the context of a program.
    - Laura asks: in order to be eligible for subpart 2 you do have to have a facility within the boundary of an LEA overseeing the program? Vic confirms this.
    - Laura asks about the amount of funds that can be reserved/spent on at-risk funding. This question was sent to the PO’s, since it was a use of funds question.
      * Michaela suggests to also keep in mind that “at risk youth” are not included in the child count which is tied to funding.
  + Under 1423, SCs are required to explain the process behind their competitive applications. SCs also ensure that formal agreements between LEAs and correctional facilities have be reviewed and updated.

## Closing

* If you have any questions, comments, or concerns regarding the style and flow of this CoP meeting, please let us know! We are always looking to serve our hardworking State Coordinators to the best of our ability, and highly value any constrictive feedback.
* There were a few questions that were asked in the CoP that needed to be logged as TA; I have input these questions below into our TA ticketing system, and they are being handled by our providers and/or ED. If you feel that your question was not captured accurately here, please let us know and we will update it!
  + Fran asks what level of documentation is needed when they are monitored by ED to demonstrate that they did monitor their subgrantees. Specifically, does the use of an SC’s monitoring tool (which indicates in the form a checklist that a subgrantee is eligible) be a sufficient way to document that subgrantees met requirements at the time the SC conducted monitoring, OR are the actual documents of subgrantees needed for ED (e.g., there are requirements on the amount of hourly programming students should receive. Is the school schedule document needed for ED or would a monitoring tool that indicates that this being done suffice?).
  + Paula asks do we know who's being monitored by USED? When we fund 3 year programs- what about the funding?--supposed there is a decrease?
  + Meghan asks what would happen if a program closed and reopened in an institution within a different LEA jurisdiction? The physical building moved so should funding transfer to the LEA in the new jurisdiction?
  + Laura explains that she still has not head back from POs on the percentage of my subpart 2 funds can be used for at risk youth?
* If you have additional questions/concerns and would like to submit a TA ticket, please email us! You are more than welcome to reach out to a TA facilitator directly, or you can email our TA ticketing system directly at [NDTAC@longevityconsulting.com](mailto:NDTAC@longevityconsulting.com)