# CoP 4 April Meeting Summary

Thursday, April 21, 2022 1:00 PM - 2:00 PM ET

**Topic:** Monitoring Your Subgrantees

**Facilitator:** Victor St. John

**Notetaker:** Michaela Rizzo

**Additional NDTAC Representatives:**

**Attendees:** Jennifer Engberg (OR), Dawn Carmody (MI), Emily Teeter (IA), Gerardo Ramirez (TX), Hearcel Craig (OH), Mary Russman (NY), Shawn Owen (GA), Shawn Cockrum (MO), Ratasha Bradley (IL), Wes Blake (KY), Carla Greene (GA), Monica Higgins (KY), Melanie Barner (GA), Sherry Davis (CA), Whittney Mitchell (GA)

This CoP session focused on monitoring subgrantees. This is a large topic that naturally pairs with evaluating your subgrantees, so we discussed some core items, including: (1) the requirements of subgrantee monitoring and evaluation; (2) how you can create and improve any evaluation tools currently used; and (3) how so you use this information once collected.

## Housekeeping

* 2022 NDTAC Annual Conference is quickly approaching! The conference will take place on May 23rd, 24th, and 26th. Registration links for SCs and their guests will be sent next week, and you are welcome to forward that link to anyone you would like to attend.
* The June CoP session will be on Friday, June 24th at 12 PM ET. The topic for this session will be “Preparing Your Subgrantees for Data Collection.”
* The last CoP session in August will take place on Wednesday, August 10th at 3 PM ET. 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.
  + 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?
  + Shawn was interested to know how other States manage fiscal monitoring. Hearcel (OH) talked about his State’s process and how fiscal monitoring is managed in a separate department than the SC.
  + Gerardo (TX) talked about his State’s Random Validation Monitoring system, where subgrantees are selected by lottery and are asked to submit documentation for monitoring. If the subgrantee cannot submit the proper documents, and cannot remediate with the SC, then the issue is escalated to the fiscal office. Gerardo also talked about the frustration of using pre/post testing models for youth; some student’s facility stays are only a couple of days, or they leave so abruptly that there is no post data collected.
    - Gerardo shared a link to his State’s monitoring protocols for the group to view: <https://tea.texas.gov/finance-and-grants/grants/essa-program/essa-program-monitoring-random-validations>
  + Jennifer (OR) relates to the struggle of gathering post-data, and how it is difficult to evaluate programs when there is incomplete data. Jen discusses how her State plans to resume in-person fiscal monitoring in May.
  + The group agrees that COVID has had a significant impact in their ability to get into facilities and properly monitor. Some SCs have had success with virtual monitoring, but it all depends on the relationship with the subgrantee.
  + The group discussed upcoming changes to the CSPR in relation to pre/posttest data, and mentioned that the second comment period for those upcoming changes is open now. The hope of the group is to move away from pre/post test and encourage another entry and exit data collection method.
  + Wes (KY) talked about how his state does a version of consolidated monitoring with all the neglected facilities being monitored in 3 year cycles.
  + Mary (NY) walked the group through her State’s monitoring protocols, with her focus on subgrantee data quality and accuracy. Mary will initiate monitoring if there is an issue with the data submissions from subgrantees.
  + Hearcel (OH) took us though his monitoring process that starts in January. Hearcel sends a web based CSPR survey to subgrantees, as well as a monitoring survey to institutions. The subgrantees input any issues or concerns into this survey for the SEA to review. Hearcel also utilizes a monitoring system where subgrantees submit the formal agreements between LEAs and Correctional facilities and other service providers, along with any other required documents.

## Why do we monitor and evaluate subgrantees?

* Use evaluation findings to improve programming for students
* Hold subgrantees accountable
* The TIPD statute focuses on the subgrantee requirements for monitoring and evaluation. However, in the Statute, it is the responsibility of the SEA to ensure that their subgrantees are following the statutory requirements.
  + When ED resumes State monitoring, they will look to see that you are checking in and monitoring your subgrantees for compliance

### Monitoring

* Title I, Part D (Part D)-funded programs are monitored to ensure compliance with applicable State and Federal laws, including the Elementary and Secondary Education Act.
* Monitoring reviews occur at three levels:
  + The U.S. Department of Education (ED) monitors State education agencies (SEAs) that receive funds (**Federal monitoring**).
  + SEAs monitor their State agency (SA) and local educational agency (LEA) subgrantees (**subgrantee monitoring**); and
  + SA and LEA subgrantees monitor the facilities and programs to which they allocate funds (**facility monitoring**).
* By monitoring Part D programs for compliance, administrators at all levels can ensure that students who are neglected, delinquent, or at-risk (N or D) receive a fair, equal, and significant opportunity to obtain a high-quality education.
* Monitoring also provides a mechanism for collecting information about State and local needs, so that administrators can target assistance and other resources more effectively.

### What does the Statute say about monitoring?

* Victor breaks down the Statutory requirements in terms of personnel (Subgrantees, facilities, and SCs)
  + **Subgrantees** must monitor their respective programs and facilities no less than once every 3 years
    - **SCs** must ensure/document that subgrantees are doing this
  + SCs are advised to prepare in advance by gathering information to facilitate the monitoring review. You can effectively gather information through various means.
    - For example, you can use one-on-one interviews during onsite visits with youth or staff; disseminate Web-based or pen and paper questionnaires to large groups of staff and/or youth; and hold focus groups or interviews with a small number of individuals simultaneously.
  + Additionally, it is critical to include a range of respondents and examine patterns across responses to avoid biased data or collection of skewed information.

### What does the Statute say about Evaluations?

* Like monitoring, requirements around subgrantee evaluation places much of the actions on the subgrantee, with the SEA overseeing and verifying those evaluation activities.
* [§1431: Program Evaluations](https://neglected-delinquent.ed.gov/title-i-part-d-statute#:~:text=SUBPART%203%3A%20SEC.%201431.%20PROGRAM%20EVALUATIONS.,subsequent%20programs%20for%20participating%20children%20and%20youth.)
  1. “SCOPE OF EVALUATION—Each State agency or local educational agency that conducts a program under subpart 1 or 2 shall evaluate the program, disaggregating data on participation by gender, race, ethnicity, and age, while protecting individual student privacy, not less than once every 3 years, to determine the program's impact on the ability of participants —
     + to maintain and improve educational achievement and to graduate from high school in the number of years established by the State under either the four-year adjusted cohort graduation rate or the extended-year adjusted cohort graduation rate, if applicable;
     + to accrue school credits that meet State requirements for grade promotion and high school graduation;
     + to make the transition to a regular program or other education program operated by a local educational agency or school operated or funded by the Bureau of Indian Education;
     + to complete high school (or high school equivalency requirements) and obtain employment after leaving the correctional facility or institution for neglected or delinquent children and youth; and
     + as appropriate, to participate in postsecondary education and job training programs.
  2. EXCEPTION—The disaggregation required under subsection (a) shall not be required in a case in which the number of students in a category is insufficient to yield statistically reliable information or the results would reveal personally identifiable information about an individual student.
  3. EVALUATION MEASURES—In conducting each evaluation under subsection (a), a State agency or local educational agency shall use multiple and appropriate measures of student progress.
  4. EVALUATION RESULTS—Each State agency and local educational agency shall—
     + submit evaluation results to the State educational agency and the Secretary; and
     + use the results of evaluations under this section to plan and improve subsequent programs for participating children and youth.”
* Part D programs should be designed with the expectation that children and youth will have the opportunity to meet the same challenging State academic content and academic achievement standards that all children in the State are expected to meet. ***To the extent feasible,*** evaluations should be tied to the standards and assessment system that the State or school district has developed for all children.
* **The SA or LEA must determine which tests are the most appropriate** assessments of its N or D students' progress.
  1. For example, tests designed to be administered as pre- and post-tests at the time a youth enters a facility and then, again, when he or she leaves, may be more appropriate measures of progress than annual State assessments.
  2. If it is determined that the State assessments are not available or would not provide accurate information about the progress of children in institutions, the SA or LEA may select other assessments (as well as any additional indicators to measure the progress of these programs) that are more appropriate and reflect the progress of those children toward meeting the State's standards
  3. In most cases, State definitions of Annual Yearly Progress (AYP) may not provide an appropriate indication of progress for programs that serve children and youth in institutions for children who are N or D.
     + Because of high turnover and limited length of stay of children and youth in many of these institutions, SAs and LEAs may not be able to use the same measures as are applied to children who attend school in a more traditional setting.

## Creating Your State’s Personalized Monitoring Checklist

* What information do we need from Subgrantees? Note that you will need the following data from EACH facility.
  + Disaggregated data on participation by gender, race, ethnicity, and age, not less than once every 3 years to determine the program’s effect on educational achievement
  + Accrual of school credits that meet State requirements for grade promotion and secondary school graduation
  + Transition to a regular program or other education program operated by an LEA
  + Secondary school (or secondary school equivalency requirements) completion
  + Obtaining employment after leaving the correctional facility or institution for neglected or delinquent children and youth and, as appropriate, participation in postsecondary education and job training
  + Record/documentation that subgrantees are monitoring their programs at least once every three years
  + Subgrantee program evaluation reports/results and the underlying assessments used in their evaluation
* Who may we need to speak with or collect information from?
  + Subgrantees
  + School / Program Administrators
  + Students
  + Teachers
* How do we collect some of this information?
  + Onsite or Offsite
  + Forms and Checklists
  + Interviews
  + Questionnaires
  + Web-based survey
  + Focus Groups
  + Emails
  + Online System
  + Video/phone conference
* When do we collect this information?
  + Regular monitoring cycles, consolidated monitoring, random monitoring validation. As long as the monitoring is consistent and satisfy the 3 year evaluation requirement, SCs are encouraged to develop a monitoring protocol that suits them best.
* How to respond?
  + Confirm receipt, completeness, and quality of information
  + Submit an official response and or corrective action plan if needed, or have subgrantees submit a plan to address any identified noncompliance.

## 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.