Federal Panel: Program Updates

May 5, 2025

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Agenda

General Updates

Monitoring Updates

Data Collection

Grantee Satisfaction Survey

Meet Our Team

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Program Officer
Title I Part D

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Presidential
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Your State's ED Program Officer

Heather: AL, HI, MI, MD, MI, MN, MO, NE, NH, NJ, NM, NY, NC, ND, PA, SC, TX, WY

Jeff: AK, DC, GA, IN, KY, LA, ME, MS, MT, NV, OR, PR, UT, VT, VA, WA, WV

Mark: AZ, AR, CA, CO, CT, DE, FL, ID, IL, IA, KS, MA, OH, OK, SD, TN, WI

Please direct all communications about your Title I, Part D grant to TitleI-D@ed.gov. This ensures your email will be reviewed promptly. Feel free to copy your State's program officer on the email.

ED and NDTAC: Send us your questions!

How can we improve this?

Questions to send to ED
• Annual Count
• Data Collection
• Facility Eligibility
• State Plan Amendments
• Statutory Definitions
• Use of Funds

Questions and/or Requests to send to NDTAC
• Program Implementation
• Resource Requests
• Research & Promising Practices
• Data Analysis
• Collaboration
• Presentations at Conferences

Are we doing this in accordance with the statute?

Resource Update

- ED
  - Title I Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk Non-Regulatory Guidance PDF (Updated December 20, 2024)
- NDTAC
  - Tip Sheet: Identifying Neglected and Delinquent Institutions with Eligible Children to be Included in the Annual Count: https://neglected-delinquent.ed.gov/resources/ndtac-dip-sheet-identifying-neglected-and-delinquent-institutions-eligible-children-be
- National Center for Homeless Education (NCHE)
 - NCHE has a new contractor providing services, but the website remains the same: https://nche.ed.gov

Title I, Part D Funding Periods

❖Funds are awarded July 1 each year
  ❖ Example: FY24 funds were awarded July 1, 2024

❖Funds are available for obligation 27 months, through September 30 two years after award
  ❖ Example: FY23 funds will be available until September 30, 2025

❖Liquidation period runs through January of the following year
  ❖ Example: FY24 funds have a liquidation period through January 30, 2027

Allocations—Flow of Title I, Part D Funds
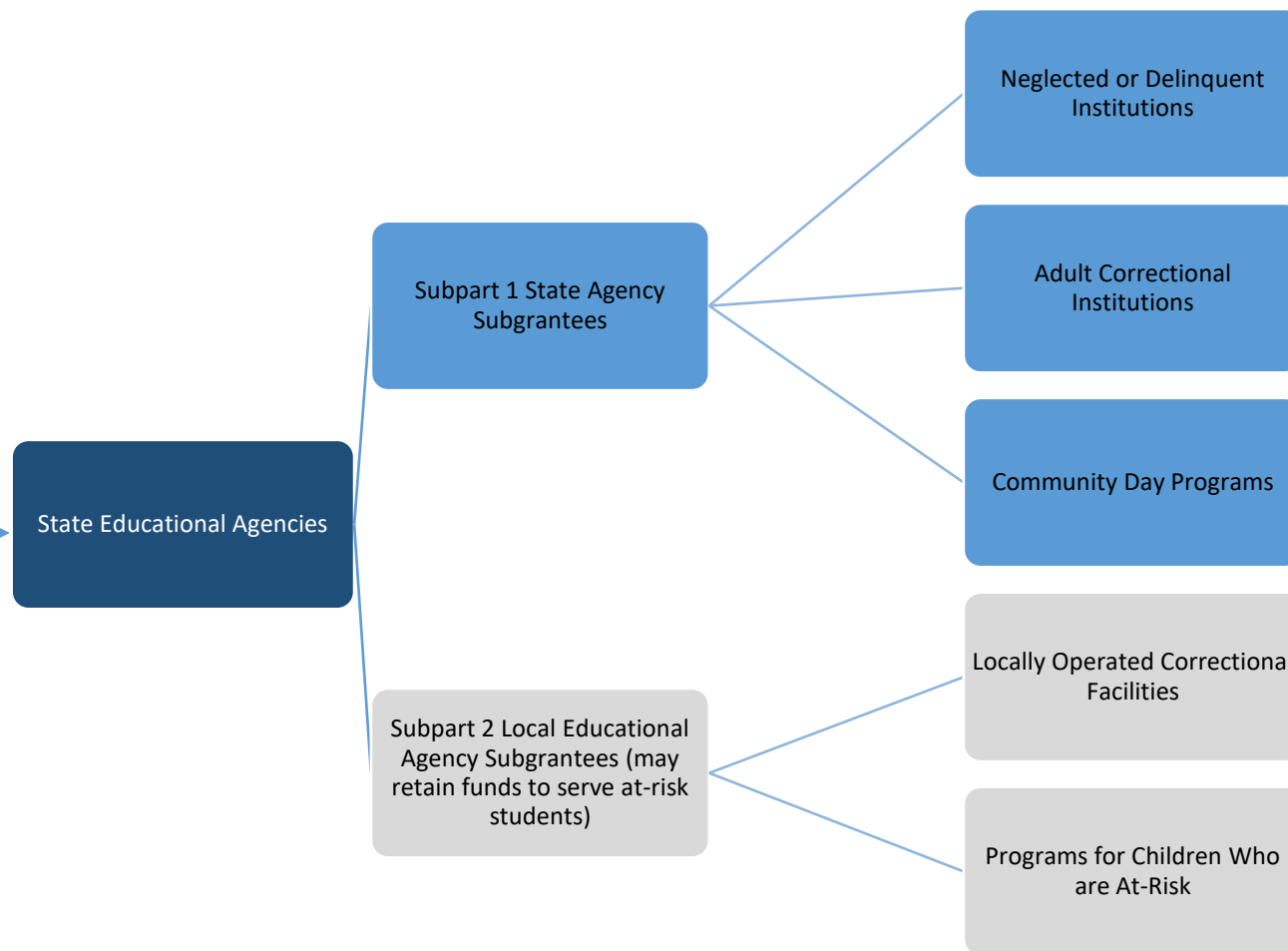
Which Students/Facilities May Receive Services?

Subpart 1—Funds are awarded to State agencies (SAs) based on their proportion of the submitted State count, but there is some flexibility in regard to which students the SA will serve.

- An SA that receives Subpart 1 funds must assess the educational needs of all eligible children and youth in eligible institutions and community day programs. Using assessment data, an SA can **select those most in need of special assistance**. If available funds are insufficient to meet the needs of all eligible youth, those most in need should be served first.

Which Students/Facilities May Receive Services?

Subpart 2 -

- An SEA can award Subpart 2 funds by formula to LEAs **that have an eligible delinquent facility within their boundaries.**

- Allocation amounts are based on the same local delinquent count that it submitted to ED or **based on other data and LEA eligibility criteria** that the SEA chooses to use. Funds may also be awarded competitively.

- An LEA that receives Subpart 2 funds can award a subgrant or contract to a local facility or provide services itself to eligible students enrolled in the LEA or residing in facilities.
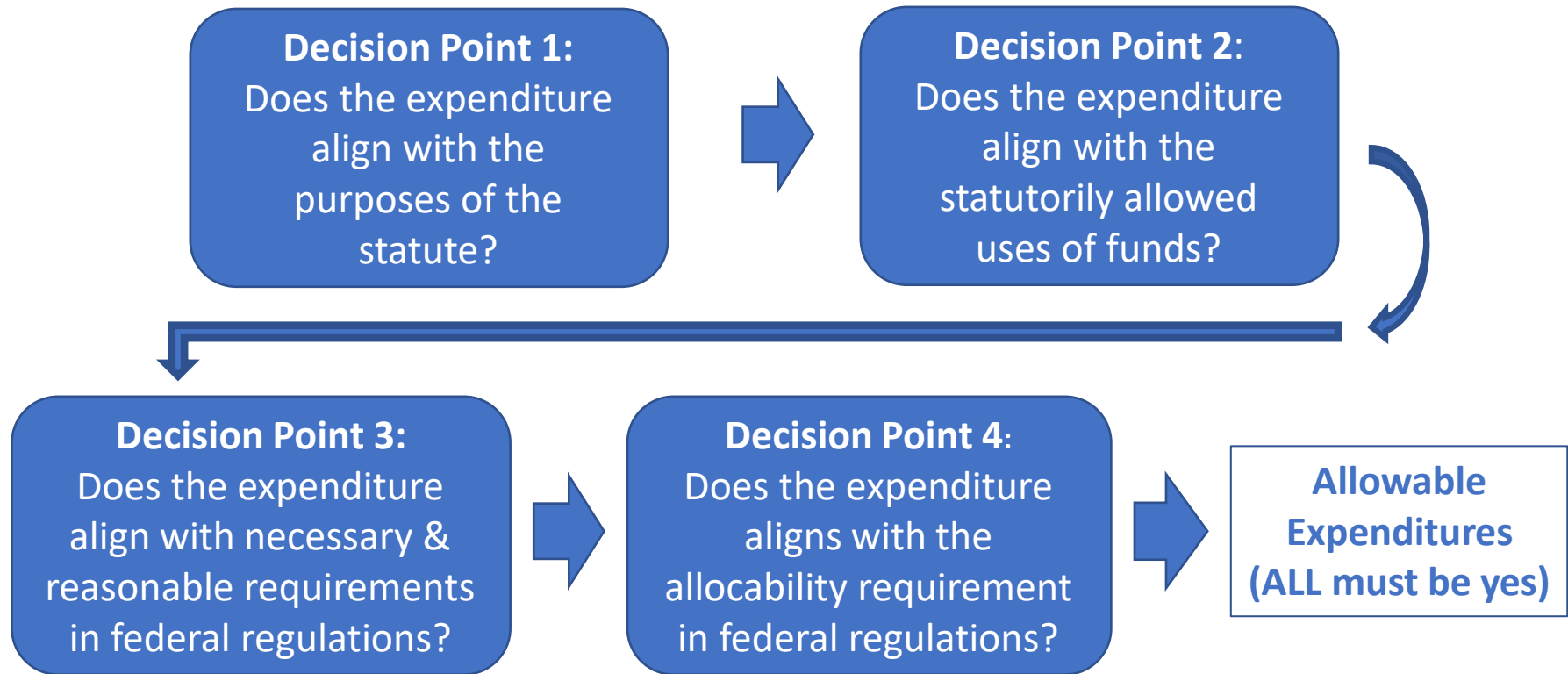
Which Students/Facilities May Receive Services?

Under Subpart 2, States and LEAs may serve **"at-risk"** students who do not meet the statutory definition of delinquent and who are not included in the counts.

Section 1432(2): "A school-aged individual who is at-risk of academic failure, dependency adjudication, or delinquency adjudication, has a drug or alcohol problem, is pregnant or is a parent, has come into contact with the juvenile justice system or child welfare system in the past, is at least one year behind the expected grade level for the age of the individual, is an English learner, is a gang member, has dropped out of school in the past, or has a high absenteeism rate at school."

How can you determine if an expenditure is allowable?

Decision Point 1:
Does the expenditure align with the purposes of the statute?

Decision Point 2:
Does the expenditure align with the statutorily allowed uses of funds?

Decision Point 3:
Does the expenditure align with necessary & reasonable requirements in federal regulations?

Decision Point 4:
Does the expenditure aligns with the allocability requirement in federal regulations?

Allowable Expenditures (ALL must be yes)

NDTAC Use of Funds Tipsheet: https://neglected-delinquent.ed.gov/resources/ndtac-tip-sheet-use-title-i-part-d-funds-decision-process

Facility Closures and Re-Allocation

- If an LEA is receiving Title I, Part D, Subpart 2 funding, and the facility it is serving closes during the middle of the year, can the SEA re-allocate the funds?
  - The LEA works with the SEA to identify other allowable uses of the funds, such as support for another eligible facility or providing additional services to at-risk youth served by the LEA.
  - If an LEA is unable to identify other allowable uses, it should inform the SEA so the SEA can distribute unneeded funds to other LEAs.

MONITORING UPDATE

ED's Monitoring Objectives

The U.S. Department of Education aims to:

- Gather evidence from State educational agencies to assess the effectiveness and impact of State policy on local practice

- Review State support of its subgrantees, including guidance and technical assistance

- Evaluate the effectiveness of State monitoring of programs

- Deepen understanding of State issues regarding program implementation

- Identify and share successes and best practices observed

Monitoring Update

- ED conducts a risk analysis which includes factors such as performance on GPRA measures, data reporting, fiscal concerns such as large unspent balances and turnover in State Coordinator.

- In fall 2022, ED implemented a new Title I, Part D monitoring protocol and processes including subgrantee interviews (posted on OESE's performance review page).

- The initial monitoring process and protocols are being piloted for 3rd year. We appreciate your feedback!

- ED is currently reviewing the protocols for potential changes. We expect to have updated protocols in Summer of 2025.

SEA Monitoring Protocol for Subparts 1 & 2

The SEA monitoring protocol includes:
- Annual student count
- Application requirements and review process
- Subgrantee eligibility and use of funds
- State plan requirements
- State administration funds
- Transition services
- Subrecipient monitoring
- Performance reporting and data quality

Monitoring Schedule

Title I, Part D Monitoring Pilot Schedule

- FY23 monitoring reviews – Indiana, Louisiana, Massachusetts, New Mexico

- FY24 monitoring reviews – Alabama, Nevada, Pennsylvania

- FY25 monitoring reviews –
    - Targeted - Arkansas, Delaware, Mississippi
    - Consolidated - New Hampshire
    - Comprehensive - South Carolina, Wyoming

- All completed reports are available at: https://www.ed.gove/about/ed-offices/oese/key-documents

Targeted Monitoring

- Uses the same protocol and critical elements
- No subgrantee interviews

- 2 different approaches
  - All program elements for either Subpart 1 OR Subpart 2

  OR

  - Selected program elements for Subpart 1 AND Subpart 2
    - Program basics
    - Fiscal internal controls
    - Data quality and reporting

neglected-delinquent.ed.gov

Monitoring Roles and Responsibilities

ED
- Review documentation
- Select subgrantees for interviews
- Conduct interviews
- Finalize and distribute monitoring report

NDTAC
- Support interview process and review of documentation
- Note-taking during interviews

SEA
- Develop agenda based on availability of SEA staff
- Provide documentation for review in advance of monitoring
- Advise in the selection of subgrantees and coordinate interviews

Lessons Learned in 2022-25 Monitoring

Biggest lesson: "Things Change"
- Systemic changes in states
- Facilities' missions evolve
- State coordinator turnover

Common areas for corrective actions
- Annual count
- Subgrantee eligibility
- Facility eligibility
- Signed agreements

Monitoring Resources

OESE protocols and monitoring reports

- https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/performance-review/

Program website

- https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/prevention-intervention-programs-children-youths-neglected-delinquent-risk/

NDTAC Resources

- https://neglected-delinquent.ed.gov/administering-title-1/monitoring-and-compliance

DATA COLLECTION
Where did I go wrong?

Programs – Types and Numbers

- **The program types reported on the CSPR must match the program types reported in EDFacts.**

- The CSPR collects the "Count of Programs" by program type. EDFacts collects the program type by LEA. The person submitting the CSPR and the person submitting EDFacts data should communicate to ensure that the program types and counts match.

- If you report data on the CSPR for group homes, juvenile detention, and long term residential then you must report data in EDFacts for those three program types.

- Counts may not match if an LEA operates more than one of a particular program type. For example, an LEA might have three group homes, but all data will be reported in the aggregate for the category "group homes."
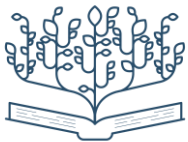
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Length of Stay and Average Days Served

- Length of stay is an average of all students in the facility. It is unlikely that all students were present for 365 days.

- Average days served is an average of the number of days each student participated in the TIPD funded educational program. It is unlikely that a program was offered on weekends or on holidays. The number should not equal the average length of stay.

- It is also unlikely that all students would attend class every day it is offered. Students are often required to attend court hearings, go to medical or psychological evaluations, may get sick, may be punished with isolation, or have other reasons for not attending school. Adult facilities are more likely to experience lockdowns.

Long-Term Students and Academic Achievement

- Long-term students are those students who have been in the facility for 90+ days

- **All** students should be given an initial assessment

- Students who are still in the facility on the 90th day should be given a follow-up assessment

- The number of students who receive both an initial and follow-up assessment cannot be greater than the number of long-term students.

Enrolled in a Program and Graduation

- Students must earn high school course credits to graduate. The number of students who graduate should always be less than or equal to the number who earned credit.

- Students must be enrolled in a GED program to earn a GED. The number of students who earn a GED should always be less than or equal to the number who are enrolled in a GED program.

Why Should I Conduct Data Checks?

- The first challenge in utilizing data to improve program outcomes is to ensure that the data are good.

- Data that are incomplete or inaccurate only tell you that you need better quality data.

- Programs that receive funding are required to submit all relevant data files. Data submission is not optional.

How Should I Conduct Data Checks?

- Compare CSPR and EDFacts data to ensure that they align.

- Ensure that each Subpart 2 facility that submits data in any file has submitted data in all files.

- Check to ensure that the number of students reported as being tested is less than or equal to the number of long-term students.

- Check to ensure that the number of students reported as having an academic outcome is less than or equal to the total number of students served.

How Can I Use Program Outcome Data?

- Are programs identifying students in need of additional supports under IDEA and Title III (EL)?

- Are programs assisting students in making gains in reading and math?

- Are students given the opportunity to earn a regular high school diploma?

- Are students provided with opportunities to participate in job training/career and technical education (CTE) or earn a certificate?

Correction Opportunity Requests

- Submit correction opportunity requests to PSC prior to Wednesday, **May 7, 2025**, to be included in this correction opportunity opening.

- Approved correction opportunity requests are due Wednesday, **May 14, 2025**.

- The correction opportunity request template can be found in the EDFacts Workbook on the EDFacts Initiatives Site.

- Include if the request is to update the previously submitted data file or to update the data notes. Requests should only be sent to PSC once the SEA has the data available for upload in EDPass.
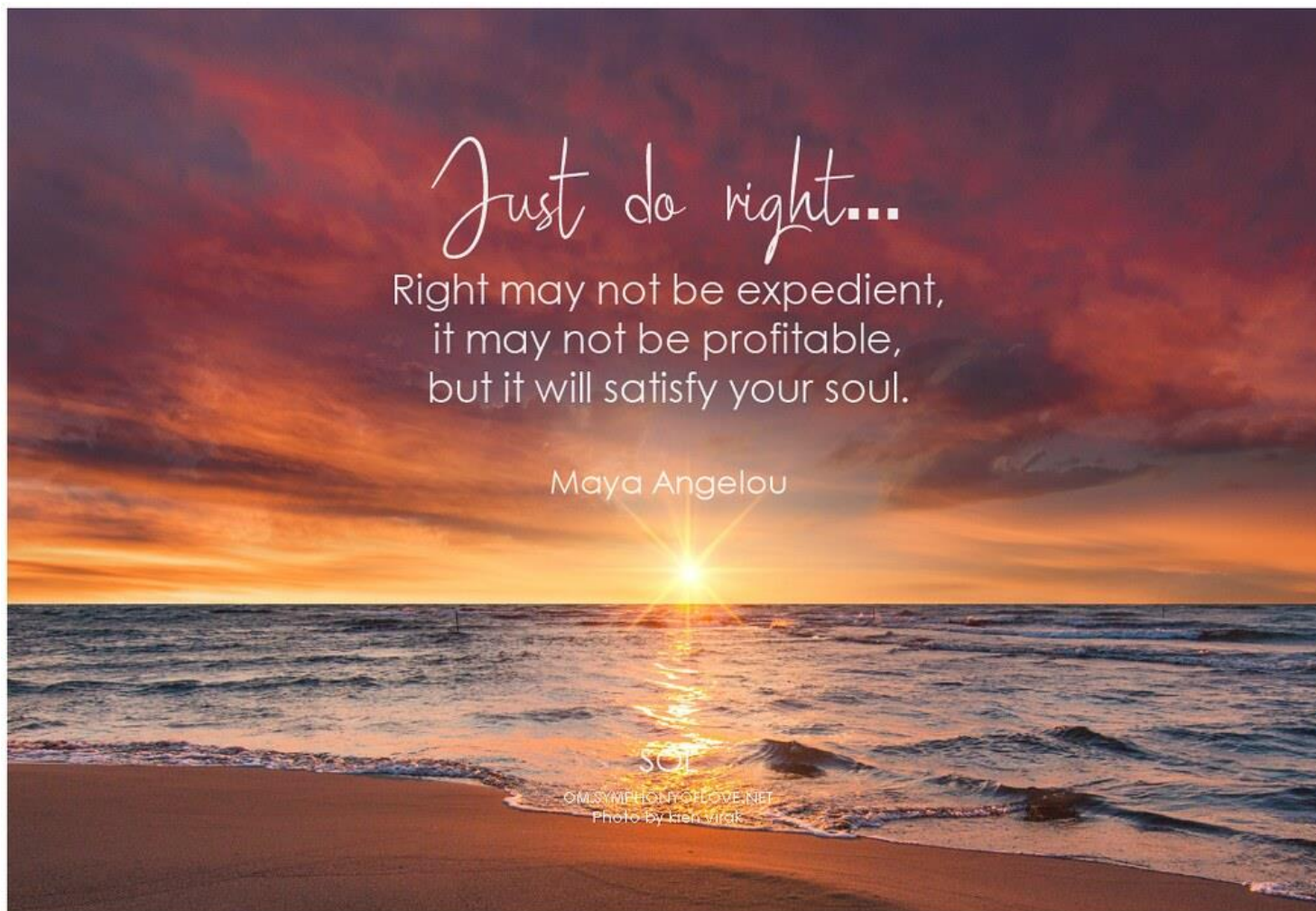
Submitting Data Notes

- Why? – Submit a note any time you are unable to submit data or if the expected data is a zero

- Be detailed. Do not say "we don't have data." Explain why you do not have the expected data
  - Students did not exit the program
  - Students are in grades 6-8 and are not enrolled in high school or in a GED program
  - State law 1-111 prohibits contact with juveniles after they leave a state or locally operated facility
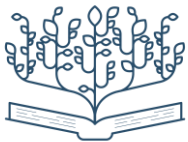
GRANTEE SATISFACTION SURVEY (GSS)

Just do right...
Right may not be expedient,
it may not be profitable,
but it will satisfy your soul.

Maya Angelou

Grantee Satisfaction Survey Overview

- In 2024: 52 invitees | 41 completers | 79% completion rate

- Thank you to all who completed! We rely on your input to drive our work and improve our support

- Our team has analyzed individual comments submitted

- There are currently no plans to conduct the 2025 GSS

Analyzing the 2024 Survey Outcomes

- **Overall Satisfaction**: Climbed 13 points from 2023 and 27 points from 2022
- **Stable Area**: Grant Performance Reporting Requirements: +1
- **Big Increases**:
  - Online Resources: +10 points
  - ED/Staff Coordination: +7 points
- **Open-ended Feedback Highlights**:
  - 'NDTAC and its community has been very available. It's nice to have this resource to have support.'
  - 'Would love to see an updated non-regulatory guidance as well an FAQ section for TIPD.'
- **Positive Trend**: Increased satisfaction in Technical Assistance services: +11 points

Actions We Have Taken to Provide Support

- Implemented a Pathways Program in Collaboration with NDTAC
  - Provides targeted support to new State coordinators to help them become more comfortable with the basics of Title I, Part D
  - NDTAC and ED have held 3 of these sessions since November of 2024
- [NDTAC Developed a Title I, Part D 101 Online Resource Guide](#)
  - Five self-paced learning guides designed to provide detailed information on fundamental components of Title I, Part D administration, including knowledge checks, and an opportunity to receive a completion certificate.

Actions We Have Taken (Continued)

- Established Office Hours with State Coordinators
  - NDTAC and ED hold monthly office hour sessions, where topics like fiscal matters impacting the spending of Title I, Part D funds and the program evaluation requirements according to [Sec. 1431 of the Title I, Part D statute](#) are discussed in addition to your individual questions about Title I, Part D

- Updating Non-Regulatory Guidance
  - A comprehensive update to the Title I, Part D NRG was published on December 20th, 2024

- Please feel free to share more ways that we can help support you during and beyond the conference!

For more information or any questions,
please e-mail:
TitleI-D@ed.gov
ndtac@longevityconsulting.com