

166

00:33:02.400 --> 00:33:03.810

Christina Endres, NDTAC: Okay, thank you.

167

00:33:04.300 --> 00:33:24.250

Christina Endres, NDTAC: So we know that federal monitoring can feel daunting, but it is one of the most powerful catalysts that we have for strengthening your programs. So we have a panel that is going to bring together state coordinators who have already been through Title I, Part D monitoring, and those who are actively getting ready for it, offering perspectives from both sides of the experience.

168

00:33:24.360 --> 00:33:38.239

Christina Endres, NDTAC: Panelists are going to share their candid reflections and practical strategies, such as refining grant applications, strengthening your guidance and policy documents to set clear expectations around eligibility and compliance.

169

00:33:38.240 --> 00:33:48.040

Christina Endres, NDTAC: And illustrating how Title I, Part D monitoring can actually drive meaningful improvements in systems, accountability, and also program integrity.

170

00:33:48.200 --> 00:33:49.929

Christina Endres, NDTAC: So with that,

171

00:33:50.070 --> 00:34:08.910

Christina Endres, NDTAC: I do want to just, mention again, because we want to give, a shout out to her, that Garen Jay couldn't be here, but we will have some information from her later on in the session. But with that, I am going to turn the floor over to, Shannon Cranmore, and Jessica, and Makisha.

172

00:34:10.400 --> 00:34:12.160

Shannon Cranmore: Hi, good afternoon, everyone.

173

00:34:12.310 --> 00:34:16.739

Shannon Cranmore: Christine, did we have slides, or do you just want me to go down the questions?

174

00:34:17.190 --> 00:34:22.279

Kristine Chan, NDTAC: Yeah, you can just go, down the questions and jump around if it makes sense.

175

00:34:22.310 --> 00:34:30.820

Shannon Cranmore: Sure, absolutely. So I'm Shannon Cranmore, I'm the state, program coordinator for Subpart 1 in Wyoming.

176

00:34:31.190 --> 00:34:40.450

Shannon Cranmore: I also serve... well, just do a brief introduction of everybody, sorry. I also serve as our State Homeless Coordinator and Equitable Services Ombudsman.

177

00:34:40.590 --> 00:34:57.439

Shannon Cranmore: And I've been in this role for about 8 years. I've been with the Wyoming Department of Education for 23 years. Prior to this role, I was our Ed FACTS Coordinator, in our Data Division. I'll go ahead and pass it to Jessica, who's my counterpart.

178

00:34:59.370 --> 00:35:14.379

Jessica Fancher-Wyoming Dept. of Education: Good afternoon, everyone. I'm Jessica Fancher. I am the Title I-D Subpart 2 program manager. I also oversee the Title III program and time and effort for our department.

179

00:35:14.510 --> 00:35:28.260

Jessica Fancher-Wyoming Dept. of Education: I have been in this role for 8 years with the department for... 8 years next month, actually. Prior to that, I worked for the Department of Health and the Behavioral Health Division.

180

00:35:28.260 --> 00:35:35.849

Jessica Fancher-Wyoming Dept. of Education: working with developmental disability waivers, and then prior to that, I worked, in the Medicaid.

181

00:35:35.850 --> 00:35:45.719

Jessica Fancher-Wyoming Dept. of Education: Division of Healthcare Financing, working with eligibility for Medicaid waivers, facilities, state agencies.

182

00:35:46.310 --> 00:35:50.220

Jessica Fancher-Wyoming Dept. of Education: Case management agencies that serve people with disabilities.

183

00:35:50.900 --> 00:35:52.490

Jessica Fancher-Wyoming Dept. of Education: And,

184

00:35:52.590 --> 00:35:59.160

Jessica Fancher-Wyoming Dept. of Education: I think that's pretty much it. I have a bachelor's in business administration, a Master's in Management and Leadership.

185

00:35:59.450 --> 00:36:02.580

Jessica Fancher-Wyoming Dept. of Education: And... Pass it to Nakisha.

186

00:36:03.990 --> 00:36:11.129

Makesia Sumpster: Good evening, everyone. My name is Makisha Sumter. I'm the Title I, Part D State Coordinator for South Carolina.

187

00:36:11.250 --> 00:36:18.280

Makesia Sumpster: July 1 will be year 2 for me, so I'm still technically a newbie, still learning, of course.

188

00:36:18.420 --> 00:36:32.020

Makesia Sumpster: Prior to coming to the State Department, my vast majority of my, experiences, of course, is in education. 20 years in education. Right before I came here, I was an assistant principal.

189

00:36:32.110 --> 00:36:45.690

Makesia Sumpster: In addition to being the State Coordinator for Title I, Part D, I do... I work with Title Subpart I, Subpart II, and our neglected reserve. I'm also a program manager for Title I, Title II, and Title IV.

190

00:36:46.930 --> 00:36:48.990

Makesia Sumpster: So that's just a little bit about me.

191

00:36:49.810 --> 00:36:56.950

Shannon Cranmore: Great, thank you. I think the first two questions I have on my sheet, I think we can roll them into one.

192

00:36:57.380 --> 00:37:09.600

Shannon Cranmore: So, the first question is, when you received notice that your state was being monitored, or when you... or when you realized you needed to proactively prepare for monitoring.

193

00:37:09.600 --> 00:37:22.590

Shannon Cranmore: What was your initial reaction, and what was the first thing you did? And then also, how did you perceive your program on paper? Did you think it was successful, needed improvement, or maybe you didn't know?

194

00:37:22.690 --> 00:37:36.219

Shannon Cranmore: I'll go ahead and start, with this one. We were notified, I want to say it was the fall of 24, that we were going to be monitored, and then we were actually monitored in the spring of 25.

195

00:37:36.360 --> 00:37:45.280

Shannon Cranmore: So it's been about a year since that monitoring occurred. For my Subpart 1 program,

196

00:37:46.170 --> 00:38:00.780

Shannon Cranmore: I kind of fall under two categories of how I perceive the program. I knew it needed an improvement, but I wasn't sure where. So I was really excited to be monitored to ensure that my program was

197

00:38:00.810 --> 00:38:16.779

Shannon Cranmore: meeting all the federal requirements. Little did I know how bad it was going to be for me, but we'll talk about that more. But it was a really good process. USED was wonderful throughout, provided a lot of support.

198

00:38:16.930 --> 00:38:27.870

Shannon Cranmore: And have helped, myself, and I assume Jessica would say the same thing, helped us get our programs on track to where we feel pretty confident in them now.

199

00:38:28.190 --> 00:38:37.809

Shannon Cranmore: I'm just going to go to Jessica again, because she can expand on subpart 2. Not that I'm ignoring you, Keisha, Makisha, but just because we kind of align on some of these.

200

00:38:39.300 --> 00:38:49.650

Jessica Fancher-Wyoming Dept. of Education: So, mine was similar to Shannon's, but not necessarily excited. My initial reaction was relief.

201

00:38:49.790 --> 00:39:07.170

Jessica Fancher-Wyoming Dept. of Education: I had already been overseeing the program for almost 7 years at the time, and so I had made a lot of changes, attending the NDTAC meeting, so... but I knew there were a lot of areas where there were compliance concerns.

202

00:39:07.230 --> 00:39:23.990

Jessica Fancher-Wyoming Dept. of Education: Especially around use of funds. I knew that some subgrantees were going to willingly accept changes, or not willingly accept changes, without stronger backing behind them. So, for me.

203

00:39:24.120 --> 00:39:35.350

Jessica Fancher-Wyoming Dept. of Education: The relief and the excitement, circling back to that in a strange way, knowing that my program was going to be monitored was reassuring, because

204

00:39:35.620 --> 00:39:54.750

Jessica Fancher-Wyoming Dept. of Education: it was going to give me teeth in the game, and also give me someone to blame, you know? USED made me do this, but no, really, we need to do things differently, not because I'm saying so, but that's... this is what USED expects, this is the intent of the program.

205

00:39:55.100 --> 00:40:01.950

Jessica Fancher-Wyoming Dept. of Education: As far as looking back on paper, when I think about my program.

206

00:40:01.960 --> 00:40:12.500

Jessica Fancher-Wyoming Dept. of Education: I knew that there were things that weren't doing... being done correctly. We historic... we inherited our program

207

00:40:12.500 --> 00:40:23.779

Jessica Fancher-Wyoming Dept. of Education: And the person had been doing it for many, many years, so we knew that there was something wrong, but it wasn't successful, not only because the data

208

00:40:24.580 --> 00:40:33.229

Jessica Fancher-Wyoming Dept. of Education: said that it wasn't successful, the outcomes weren't there, some... there was missing data, so we kind of knew that.

209

00:40:33.570 --> 00:40:35.400

Jessica Fancher-Wyoming Dept. of Education: I think that...

210

00:40:35.930 --> 00:40:51.749

Jessica Fancher-Wyoming Dept. of Education: long-standing practices being in place over time, it became clear that there were significant gaps. So, I think I always knew that something was wrong, but I didn't know exactly what

211

00:40:51.760 --> 00:41:01.189

Jessica Fancher-Wyoming Dept. of Education: I fixed the things that I could identify, and then I was, like I said, relieved when we were going to be monitored and excited

212

00:41:01.510 --> 00:41:02.450

Jessica Fancher-Wyoming Dept. of Education: So...

213

00:41:02.580 --> 00:41:10.920

Jessica Fancher-Wyoming Dept. of Education: play on Shannon, to hear what we could fix and what needed to be fixed so we could make a better program.

214

00:41:16.430 --> 00:41:25.749

Makesia Sumpter: My initial reaction to learning that we were being monitored was a full-on panic attack at first.

215

00:41:25.750 --> 00:41:36.459

Makesia Sumpter: And again, remember, I was brand new. I got hired in July of 24 when I walked in. I found out that we were being monitored in spring of 25.

216

00:41:36.880 --> 00:41:44.459

Makesia Sumpter: Needless to say, I was kind of grateful for that monitoring experience, because it fast-tracked my learning.

217

00:41:44.600 --> 00:42:08.969

Makesia Sumpter: I definitely fast-tracked it. My team leader, Jennifer Rhodes, who was over Title I, Part D prior to me being hired, it's not like she just handed it off and said, here, here you go. She stayed with me, we went through the monitoring process together. It was more so like she was the chair and I was the co-chair, because, again, I was still in training, I was still learning.

218

00:42:09.330 --> 00:42:28.519

Makesia Sumpter: But again, that did help me fast-track that learning into the world of, neglected and delinquent, because prior to, coming to the State Department, very knowledgeable of Title I, Title II, Title IV, coming from a Title I school as an AP.

219

00:42:29.340 --> 00:42:41.819

Makesia Sumpter: I had a depth of knowledge of that. However, N&D was something that I had to learn and learn quickly. Looking back at everything on paper, it...

220

00:42:42.100 --> 00:42:47.960

Makesia Sumpter: it made me, as I'm learning, take notes of what needs to be improved.

221

00:42:48.010 --> 00:42:55.759

Makesia Sumpter: For example, eligibility was definitely one of the things I know that we needed to, go back and,

222

00:42:55.770 --> 00:43:14.879

Makesia Sumpter: do an eligibility review of our facilities after going through that monitoring. Jennifer was responsible, and she collected all of our documentation to support everything that we did, so as she's collecting documents, I'm going through, looking through what could we update, what we could revise, what needs to be added.

223

00:43:14.880 --> 00:43:22.139

Makesia Sumpter: So that's kind of the role that I played in the monitoring in the spring when that came about, but it was definitely a...

224

00:43:22.140 --> 00:43:29.649

Makesia Sumpter: a learning experience for me, coupled with a panic attack. But it wasn't as bad as I thought it was going to be.

225

00:43:30.480 --> 00:43:37.289

Shannon Cranmore: And Makisha, was yours the full monitoring, or was yours just the targeted data monitoring thing?

226

00:43:37.290 --> 00:43:38.310

Makesia Sumpter: full monitoring.

227

00:43:38.310 --> 00:43:42.670

Shannon Cranmore: Yeah, ours was 2, so ours was the full, monitoring.

228

00:43:45.200 --> 00:43:54.279

Shannon Cranmore: So, the next question, Makisha, we'll have you answer this one first. So, you had talked a little bit about the eligibility and how that came up on monitoring.

229

00:43:54.320 --> 00:44:12.120

Shannon Cranmore: It says, so eligibility has been one of the most common and complex findings in TIPID monitoring. Walk through how you approached reviewing the eligibility of your facilities and state agencies. What did that process look like, and what surprised you?

230

00:44:13.770 --> 00:44:33.590

Makesia Sumpter: Before I could actually start the eligibility review, I needed to learn what were the eligibility requirements, so I did some fast learning there, just to make sure that I fully understood the eligibility requirements. And then, from there, I created an eligibility review form.

231

00:44:33.650 --> 00:44:36.810

Makesia Sumpster: And sent that out to my..

232

00:44:36.870 --> 00:44:49.990

Makesia Sumpster: I contacted all of my LEAs. I did a training with my LEAs first. Then I disseminated the form to them, and we went through the form together. DSS, we normally receive a list

233

00:44:50.000 --> 00:45:02.750

Makesia Sumpster: from DSS and both DHEC of our facilities that are our residential facilities. We went through the list, we looked at our state agencies, we looked at the list from DSS, DHEC,

234

00:45:02.880 --> 00:45:19.320

Makesia Sumpster: sent that list out to the LEAs. They received the eligibility review form. Each LEA was then responsible for sending out that eligibility review form to any facilities within their geographical boundaries.

235

00:45:19.770 --> 00:45:24.960

Makesia Sumpster: I received all of the forms, I went through each and every form one by one.

236

00:45:25.170 --> 00:45:42.850

Makesia Sumpster: reached out to directors of facilities, directors of any place that I had a question where I did not feel comfortable with what they put on their form, I did a phone interview with whomever was the contact person at that particular facility.

237

00:45:43.130 --> 00:45:57.730

Makesia Sumpster: And from the phone interview, some of the facilities went, you know, went back and forth because they had been labeled as either a neglected or a delinquent facility for so long prior to me coming.

238

00:45:57.740 --> 00:46:06.060

Makesia Sumpster: And it made me, you know, second-guess and question myself on whether or not I was correct with what my determination for eligibility was.

239

00:46:06.060 --> 00:46:19.070

Makesia Sumpster: And because, again, I was new, I reached out. Jessica was a godsend, I'll say that. Kudos to Jessica. I reached out to Dan at

IndyTac, I reached out to Heather, so I used my resources that I had at my disposal.

240

00:46:19.070 --> 00:46:24.979

Makesia Sumpter: I didn't try to make those determinations on my own, because there's a lot of gray area.

241

00:46:24.980 --> 00:46:40.889

Makesia Sumpter: Especially when the facilities are challenging you, then you start questioning yourself, well, gosh, am I right? So I wanted to make sure that I reached out and used my resources, my people, as my resources. It kind of help me understand the things that I did not understand, or...

242

00:46:40.890 --> 00:46:54.940

Makesia Sumpter: give me feedback in which I could provide to these, entities to let them know, well, hey, no, you're not eligible, or hey, you are actually eligible, but you're not delinquent, you're neglected, and... because we did have to flip-flop some of our facilities there.

243

00:46:58.090 --> 00:47:06.420

Shannon Cranmore: Yeah, Jessica, I'm gonna go ahead and start this one as well, because it kind of rolls into you as well. You know what we went through?

244

00:47:06.500 --> 00:47:18.839

Shannon Cranmore: So, when, like Jessica said, when we took over in this role, we inherited the program. There wasn't a lot of documentation left from the previous person.

245

00:47:18.920 --> 00:47:35.119

Shannon Cranmore: So we had minimal things to go off of. So what we had was the last monitoring that was completed by USED for our programs was, I think, 9 years ago or something like that, and we passed with flying colors.

246

00:47:35.320 --> 00:47:41.519

Shannon Cranmore: So, when I inherited the program, it was like, it's not broke, everything was perfect, just keep it rolling, right?

247

00:47:42.350 --> 00:47:48.700

Shannon Cranmore: So, eligibility was a big thing we ran into under Subpart 1,

248

00:47:49.000 --> 00:48:00.990

Shannon Cranmore: because, we had our Department of Education listed as an SA, and we had, like, 8 facilities under us, under Subpart 1.

249

00:48:00.990 --> 00:48:09.329

Shannon Cranmore: Well, during the monos... and we didn't have an official way where we were redetermining that eligibility every year for state agencies and or facilities.

250

00:48:09.720 --> 00:48:19.009

Shannon Cranmore: So it was determined during monitoring that our state agency, the Department of Ed, actually was not an eligible state agency.

251

00:48:19.140 --> 00:48:37.849

Shannon Cranmore: Because there were some nuances in there that, even though we provided them educational reimbursement per student, that wasn't necessarily us having that oversight. We weren't the ones hiring the teachers, we were not the ones that had a say in curriculum, even though we required them to be accredited.

252

00:48:37.960 --> 00:48:42.969

Shannon Cranmore: So it was determined that we were no longer an eligible state agency.

253

00:48:43.500 --> 00:48:50.610

Shannon Cranmore: Therefore, those 8 facilities that were under us were really no longer eligible under Subpart 1.

254

00:48:50.820 --> 00:48:57.610

Shannon Cranmore: So, we did return some funds from those facilities. We basically cut them off. I think it was May we cut them off.

255

00:48:57.820 --> 00:49:05.669

Shannon Cranmore: On their grants and returned funds back to U.S. Ed, but then that rolled into Jessica's program,

256

00:49:06.950 --> 00:49:17.099

Shannon Cranmore: But now, because of that, I have included it in my grant application, where we are reviewing state agencies and facilities each year, so we're doing that annual review.

257

00:49:17.160 --> 00:49:28.159

Shannon Cranmore: So those 8 facilities that we said no to in Subpart 1, then it passed to Jessica, and she can kind of explain to you what we did looking at those facilities and the rest of her program.

258

00:49:29.400 --> 00:49:46.439

Jessica Fancher-Wyoming Dept. of Education: Yeah, so that was actually a great segue. So I ended up conducting the interviews with all of those facilities that were served under Subpart 1. And initially, it wasn't, are you eligible for Subpart 2? It was...

259

00:49:46.440 --> 00:49:51.000

Jessica Fancher-Wyoming Dept. of Education: Are you eligible to be served under Title I, Part D?

260

00:49:51.020 --> 00:50:07.769

Jessica Fancher-Wyoming Dept. of Education: At all. And so the way that I approached the interviews was, you know, people can find it disarming if you just start probing and telling them, you know, we don't think you're eligible, and these are the questions we're going to ask, so I just...

261

00:50:07.770 --> 00:50:26.180

Jessica Fancher-Wyoming Dept. of Education: approached each facility interview with questions, like, I wanted to know more about their program, and so I asked questions about how, you know, the kids that they serve, and what kind of services did they provide, and were they residentially placed, and

262

00:50:26.250 --> 00:50:40.490

Jessica Fancher-Wyoming Dept. of Education: how were they placed there? And, you know, they would... they were just open to sharing, because obviously they... they... they have been, and historically, I think one thing that,

263

00:50:40.500 --> 00:50:44.640

Jessica Fancher-Wyoming Dept. of Education: We learned, obviously, inheriting the program.

264

00:50:44.640 --> 00:51:01.849

Jessica Fancher-Wyoming Dept. of Education: some of these facilities have been receiving Title I, Part D Subpart I funds for 20 years. So, to be asking questions about their program was just... it was, you know, they were just answering the questions.

265

00:51:01.910 --> 00:51:10.969

Jessica Fancher-Wyoming Dept. of Education: And obviously, finding out that, the majority of them, I think out of all of them that I interviewed.

266

00:51:10.990 --> 00:51:23.080

Jessica Fancher-Wyoming Dept. of Education: Well, I know, only two were determined eligible for Subpart 2. The rest were not even eligible to receive Title I, Part D funds.

267

00:51:23.090 --> 00:51:41.610

Jessica Fancher-Wyoming Dept. of Education: So, we had to... I drafted a letter, and then we as a team, you know, reviewed it, we indicated why they weren't eligible, and of course, you can imagine that 20 years of receiving Title I, Part D, Subpart 1 funds.

268

00:51:41.610 --> 00:51:46.329

Jessica Fancher-Wyoming Dept. of Education: they were not happy about it. Some pushed back.

269

00:51:46.420 --> 00:52:04.170

Jessica Fancher-Wyoming Dept. of Education: unfortunately, you know, I just acknowledged the fact that it's not that we don't think the kids that you're serving need these services, but it's not the intent of this grant. And at the end of the day, we have to align

270

00:52:04.170 --> 00:52:11.110

Jessica Fancher-Wyoming Dept. of Education: The services and who's eligible with the programs and purpose and intent of the statutory

271

00:52:11.390 --> 00:52:17.250

Jessica Fancher-Wyoming Dept. of Education: what defines statute for this grant. And so, that's really what it came back on.

272

00:52:17.330 --> 00:52:34.050

Jessica Fancher-Wyoming Dept. of Education: For me, I had one facility that was not eligible, but I knew for a year or two that they weren't eligible. But they were a sub-grantee that was one that I had talked about with the first question, that

273

00:52:34.050 --> 00:52:45.309

Jessica Fancher-Wyoming Dept. of Education: wasn't going to willingly accept that change until USED said so. So, that was really helpful for me.

274

00:52:45.340 --> 00:52:58.469

Jessica Fancher-Wyoming Dept. of Education: My approach, again, was just conversational, asking them about what they provide and how kids are replaced there, and that was really how I was able to determine that they weren't eligible.

275

00:52:58.610 --> 00:53:06.590

Jessica Fancher-Wyoming Dept. of Education: What surprised me the most, I think, was how much historical practice

276

00:53:06.700 --> 00:53:24.639

Jessica Fancher-Wyoming Dept. of Education: drove eligibility decisions rather than a close analysis of statutory requirements. So, it just kind of, like, went out the window. None of the kids were adjudicated to any of the facilities, excluding the two.

277

00:53:24.640 --> 00:53:30.520

Jessica Fancher-Wyoming Dept. of Education: I really had to go back to the basics. What was the primary purpose of the facility?

278

00:53:30.710 --> 00:53:47.089

Jessica Fancher-Wyoming Dept. of Education: who's actually being served in the facility, what kids are being there, and what authority are the students placed there? Because just being placed by law enforcement, or just being placed because DFS has custody.

279

00:53:47.090 --> 00:53:53.460

Jessica Fancher-Wyoming Dept. of Education: was not adjudication, and I think that a lot of the facilities did not...

280

00:53:53.460 --> 00:54:09.499

Jessica Fancher-Wyoming Dept. of Education: they didn't understand the differences. They thought, you know, well, they're placed through the state, so that means they're adjudicated, and so really explaining to them the differences in terms of what that looked like.

281

00:54:09.500 --> 00:54:16.290

Jessica Fancher-Wyoming Dept. of Education: I did have one facility push back, and they actually disputed the eligibility determination.

282

00:54:16.290 --> 00:54:32.219

Jessica Fancher-Wyoming Dept. of Education: said that their kids were adjudicated, so I had to review all of the court orders, and I determined that I would do a 3-year period, and I reviewed all court orders for kids that were placed there over a 3-year period.

283

00:54:32.220 --> 00:54:44.269

Jessica Fancher-Wyoming Dept. of Education: To kind of see what was their primary purpose. Were kids adjudicated there as delinquent or in need of supervision? Because, keeping in mind, they have to be a delinquent facility.

284

00:54:44.380 --> 00:54:55.240

Jessica Fancher-Wyoming Dept. of Education: Or were they placed by the local Department of Family Services or another mechanism, parent placement? And so that...

285

00:54:55.470 --> 00:55:11.169

Jessica Fancher-Wyoming Dept. of Education: third facility actually ended up being under Subpart 2 by the skin of their chinny-chin-chin, but they had more court orders that stated they were adjudicated versus parent-placed or placed through DFS.

286

00:55:14.380 --> 00:55:21.019

Shannon Cranmore: Great, thank you. And some of the things that we talked about, kind of roll into this next question.

287

00:55:21.140 --> 00:55:28.370

Shannon Cranmore: Many coordinators inherit programs where eligibility decisions were made years ago by someone else.

288

00:55:28.520 --> 00:55:36.009

Shannon Cranmore: How do you go about auditing those decisions, and how do you have the conversation with a facility that may no longer be eligible?

289

00:55:36.150 --> 00:55:49.870

Shannon Cranmore: With some of the things Jessica discussed for those facilities that we determined were no longer eligible under Subpart 1 because we weren't an eligible SA, and then eligible under Subpart 2. Jessica and I really worked in partnership with this.

290

00:55:49.870 --> 00:55:56.420

Shannon Cranmore: Not only between us, but with our supervisor, our division director, even our superintendent of schools.

291

00:55:56.440 --> 00:56:03.540

Shannon Cranmore: Everybody was involved in these conversations of how we were going to deliver this news, what that would look like.

292

00:56:03.630 --> 00:56:10.769

Shannon Cranmore: And so we really had that support from our leadership when we did make these final decisions.

293

00:56:12.390 --> 00:56:30.639

Shannon Cranmore: it was hard. As Jessica said, many of these facilities were receiving money for a very long time. I've worked with them for many years, not only in this position, but my previous position, so it was really hard. I was in tears many days when I knew I was going to have to tell them, no, I'm sorry, we're pulling your funding.

294

00:56:30.930 --> 00:56:49.000

Shannon Cranmore: But we did have that support from our leadership, and I think that was very important, to make sure we had that support and, you know, explain the reasons why to get that support. So that was very helpful. Makisha, did you run into anything like that? Any pushback?

295

00:56:49.140 --> 00:56:54.699

Makesia Sumpster: I did. I had a couple of facilities that did push back.

296

00:56:55.560 --> 00:57:13.560

Makesia Sumpster: because again, just like you and both you and Jessica said, they were facilities that historically had received funding from us. And here I am, brand new, just getting here, and doing an eligibility review, and then having the...

297

00:57:14.960 --> 00:57:20.849

Makesia Sumpster: I guess, unpleasure, I would say, of having to tell them that they're technically not eligible.

298

00:57:21.140 --> 00:57:30.650

Makesia Sumpster: And they've been receiving funding for years. So, one, I think they... the pushback came more so because

299

00:57:30.890 --> 00:57:43.160

Makesia Sumpster: I was new, and so I had to over-provide them with documentation to support how they did not meet the eligibility requirements. And then finally.

300

00:57:43.310 --> 00:57:50.619

Makesia Sumpster: After several back and forth, they just kind of, you know, accepted that determination and said, well.

301

00:57:50.750 --> 00:57:53.590

Makesia Sumpster: Are we able to apply in the future?

302

00:57:53.850 --> 00:58:17.260

Makesia Sumpster: And of course, if you're... if things change at the facility, then absolutely, yes. And, you know, we do an eligibility review every year, so I let them know that one will be conducted again

this year, and if you feel that changes have been made and you meet the eligibility requirements, absolutely submit that eligibility reform. But I did receive pushback. It was, you know, it wasn't easy.

303

00:58:17.340 --> 00:58:25.610

Makesia Sumpster: telling facilities that had historically received funding from us that, you know, I'm sorry, you just don't meet those requirements.

304

00:58:25.700 --> 00:58:34.030

Makesia Sumpster: So that was a, you know, that was hard for me, and it was a hard pill for them to swallow, because it wasn't like I was wanting to pull their funding.

305

00:58:34.420 --> 00:58:49.869

Makesia Sumpster: I have to follow the federal guidelines, just like they have to. So, it was a little bit challenging, it was hard, it was a little bit gut-wrenching at the same time, because those facilities have been depending on that funding. But again, we have to stay in compliance.

306

00:58:52.660 --> 00:58:58.940

Shannon Cranmore: Thank you. To expand on that a little bit more,

307

00:58:59.310 --> 00:59:05.640

Shannon Cranmore: We've talked about determining eligibility a lot, throughout, this year's meetings.

308

00:59:05.660 --> 00:59:22.390

Shannon Cranmore: And we know it isn't always black and white. There are many, many gray areas, especially around those privately placed students or facilities that serve a mixed population. How have you navigated those gray areas in practice? Either one of you want to start?

309

00:59:25.330 --> 00:59:41.389

Jessica Fancher-Wyoming Dept. of Education: Yeah, I think you have to approach it very objectively. You have to ground everything in statute and documentation. It is gut-wrenching, and I... and like Shannon said, Hart and Makisha, gut-wrenching, but

310

00:59:41.510 --> 00:59:58.889

Jessica Fancher-Wyoming Dept. of Education: You definitely have to approach it and make those determinations case by case. You have to ask the questions, and unfortunately, sometimes the result is not necessarily what they want to hear, and it's not the news that you want to provide.

311

00:59:58.890 --> 01:00:06.370

Jessica Fancher-Wyoming Dept. of Education: But you do have to look at it, the placement data very carefully when you're...

312

01:00:06.440 --> 01:00:12.490

Jessica Fancher-Wyoming Dept. of Education: making those decisions. So, I think just looking at it...

313

01:00:13.670 --> 01:00:19.390

Jessica Fancher-Wyoming Dept. of Education: Objectively, I think analysis ultimately guides.

314

01:00:19.680 --> 01:00:35.320

Jessica Fancher-Wyoming Dept. of Education: Your determination and the conversations are difficult to have, because it feels personal, especially for district... or facilities that received funding for 20 years, in our case.

315

01:00:35.370 --> 01:00:41.610

Jessica Fancher-Wyoming Dept. of Education: And that was really, really tough to do, but I really tried to frame

316

01:00:41.790 --> 01:00:58.649

Jessica Fancher-Wyoming Dept. of Education: the questions and the conversation around compliance and program integrity rather than blame. And at the end of the day, our responsibility is to ensure that federal funds are used consistently with statutory intent, but

317

01:00:58.770 --> 01:01:08.910

Jessica Fancher-Wyoming Dept. of Education: to serve the kids that this grant is intended to serve. I think that was the question you asked. The gray areas, were...

318

01:01:09.740 --> 01:01:26.350

Jessica Fancher-Wyoming Dept. of Education: I... I... there were gray areas, but I think the gray areas were more where the facility thought they were eligible, and trying to explain to them, what adjudication meant versus

319

01:01:27.750 --> 01:01:45.730

Jessica Fancher-Wyoming Dept. of Education: parent placed, catching them before they enter the juvenile justice system, which was what I heard a lot during the interviews that I did for the facilities. So, you know, gray areas, obviously, one of our escape rooms, had a really good gray area, I think.

320

01:01:45.740 --> 01:01:55.540

Jessica Fancher-Wyoming Dept. of Education: I don't know that I encountered any gray areas other than the one that did dispute, and I just went back and

321

01:01:55.550 --> 01:02:06.670

Jessica Fancher-Wyoming Dept. of Education: looked at the court orders, and I guess if you call it gray, you know, they.. they became eligible by.. because the primary purpose, the over 50%,

322

01:02:06.670 --> 01:02:17.050

Jessica Fancher-Wyoming Dept. of Education: by two court-ordered kids. So, obviously, reviewing these facilities yearly is essential in a case like that.

323

01:02:22.610 --> 01:02:39.700

Makesia Sumpter: gray areas for me, and I won't necessarily call them gray areas for me, but they were more so gray areas for our facilities that had been receiving funding for so long. One of our delinquent facilities, for example.

324

01:02:39.860 --> 01:02:48.540

Makesia Sumpter: Of course, we all know that you had to be.. the students had to be adjudicated, or in need of supervision, so that

325

01:02:48.660 --> 01:03:04.459

Makesia Sumpter: or in need of supervision was a hang-up for them, because they understood that they had to be adjudicated as delinquent. But I guess the wording of it, or in need of supervision, they took the or in need of supervision as

326

01:03:04.460 --> 01:03:20.120

Makesia Sumpter: they could have been deemed as needing supervision from anyone, from, say, a parent, could have placed them there as needing supervision. So we went back and forth with that wording and that, you know, the wording of how that's displayed for a minute, and I had to..

327

01:03:20.240 --> 01:03:36.519

Makesia Sumpter: finally convinced them that they had to be also court-ordered in need of supervision by a judge as well, and not just in need of supervision based on what a parent says, and placed into their facility. So that was a great area for them, because that's how

328

01:03:36.520 --> 01:03:44.190

Makesia Sumpter: they've been, I guess, receiving funding because their students were parent-placed in need of supervision.

329

01:03:44.280 --> 01:03:59.960

Makesia Sumpter: ICPC was another one, never heard of it until last year, because some of their students had been placed there by ICPC, so I had to do my research and figure out what ICPC is. It's an Interstate Compact Agreement.

330

01:03:59.960 --> 01:04:05.279

Makesia Sumpter: So I had to reach out to the director here in Columbia that's over ICPC,

331

01:04:05.280 --> 01:04:16.940

Makesia Sumpter: And she had to educate me on how that works, and.. and a lot of their students were placed by ICPC, but she also informed me, just because they're placed by ICPC,

332

01:04:16.940 --> 01:04:36.399

Makesia Sumpter: doesn't mean that that student was adjudicated. And so she was able to provide me with information on what facilities, students are placed at here in our state through ICPC that are actually adjudicated students, and not just students that are placed through ICPC, but not adjudicated.

333

01:04:36.400 --> 01:04:46.140

Makesia Sumpter: So that made a big difference, too, in that facility, because I guess they assumed that their students were adjudicated since they were placed through ICPC, but there technically weren't.

334

01:04:48.000 --> 01:04:54.549

Jessica Fancher-Wyoming Dept. of Education: Makesha, I'd have to say that you got lucky that they understood adjudicated, because I think that

335

01:04:54.590 --> 01:05:06.009

Jessica Fancher-Wyoming Dept. of Education: not that that's a gray area, because for me, I mean, it's very... it's black and white. Adjudicated means they were adjudicated, for a crime.

336

01:05:06.010 --> 01:05:21.840

Jessica Fancher-Wyoming Dept. of Education: that if they were an adult, it would have risen to the level of a conviction. They did not get that. They thought, well, a judge did place them. Well, no, the judge gave DFS custody, and DFS placed them with you, and that was a really tough one.

337

01:05:21.840 --> 01:05:26.910

Jessica Fancher-Wyoming Dept. of Education: And then the other one was the adjudicated in need of supervision.

338

01:05:26.910 --> 01:05:45.620

Jessica Fancher-Wyoming Dept. of Education: they... they did not... well, all these kids need supervision, because they're... they're suicidal, or they have emotional trauma, or substance use, etc, and I would have to explain that these are status offenses, like truancy, or minor possession, or runaways, and..

339

01:05:45.620 --> 01:05:47.700

Jessica Fancher-Wyoming Dept. of Education: But they, they still..

340

01:05:47.730 --> 01:05:57.489

Jessica Fancher-Wyoming Dept. of Education: for them, that was the gray area, because they did not get the difference between it, and so I think, going back to what I said.

341

01:05:57.790 --> 01:06:15.760

Jessica Fancher-Wyoming Dept. of Education: about the facility that made it by two court orders, and because student population trends vary from year to year, that's why I decided to take a three-year snapshot versus a one-year, because they would not have been found eligible.

342

01:06:15.760 --> 01:06:30.080

Jessica Fancher-Wyoming Dept. of Education: So I just decided to do that 3-year, because then I think it would have been a gray area for us, because they would have had more to dispute if they're like, hey, we'll look at our population over this period of time.

343

01:06:30.140 --> 01:06:34.529

Jessica Fancher-Wyoming Dept. of Education: So, it's, it's definitely, I think.

344

01:06:35.230 --> 01:06:50.949

Jessica Fancher-Wyoming Dept. of Education: those are the gray areas. In my opinion, our escape room provided one for us, but I think that during monitoring, it became a gray area more on the side of the facility than it was

345

01:06:51.330 --> 01:06:54.630

Jessica Fancher-Wyoming Dept. of Education: For me, it was just where they adjudicated, so..

346

01:06:54.630 --> 01:07:00.029

Makesia Sumpter: Correct. That in need of supervision was definitely pretty tough for them to understand.

347

01:07:00.030 --> 01:07:01.510

Jessica Fancher-Wyoming Dept. of Education: It really was.

348

01:07:04.280 --> 01:07:08.990

Shannon Cranmore: Alright, great. Let's go ahead and move on to use of funds.

349

01:07:09.070 --> 01:07:17.149

Shannon Cranmore: And I'm gonna kind of combine these two questions, because I think they play well off of each other, and Makisha, we'll start with you on this one.

350

01:07:17.200 --> 01:07:29.889

Shannon Cranmore: So, use of funds is another area that comes up frequently in monitoring. Not always because something is clearly wrong, but spending isn't focused on the best outcomes for kids.

351

01:07:29.980 --> 01:07:39.679

Shannon Cranmore: How do you distinguish between what's allowable and truly reasonable and necessary, and how do you communicate that distinction with your subgrantees

352

01:07:39.690 --> 01:07:58.479

Shannon Cranmore: But in addition to that, were there any policy changes that you made regarding the use of funds, like prior approval for professional development? And if you made some of those changes, what drove those decisions, and how did your subgrantees respond?

353

01:07:59.050 --> 01:07:59.920

Makesia Sumpter: Okay.

354

01:08:00.050 --> 01:08:09.389

Makesia Sumpter: just looking back at our previous year's applications, through our June system is where they submit their application, just looking back.

355

01:08:09.660 --> 01:08:29.480

Makesia Sumpter: On what was in their plan, what they were approved for last year, and I like to compare just to see what they're submitting pre... the current year versus what they submitted and was approved for last year. I like to compare those. And a lot of our facilities,

356

01:08:31.010 --> 01:08:33.640

Makesia Sumpter: Was doing a copy-paste.

357

01:08:33.840 --> 01:08:52.090

Makesia Sumpter: And that definitely is not going to fly, because you're telling me your needs don't ever change. And so, from that, we derive the needs assessment. And what should drive your needs assessment is your data that you're using. So you use your data to, of course, you know.

358

01:08:52.660 --> 01:08:56.240

Makesia Sumpter: Create your needs assessment, and then your needs of what you're...

359

01:08:56.260 --> 01:09:03.430

Makesia Sumpter: asking for funding for should tie into your needs assessment. So I look at all of that as a whole.

360

01:09:03.430 --> 01:09:19.369

Makesia Sumpter: when I'm reading and reviewing plans to make sure that, one, the things that you're actually asking for ties into your needs assessment. And where did you get... what data drove your needs assessment? So I look at all of that as a whole.

361

01:09:19.370 --> 01:09:37.469

Makesia Sumpter: Now that's something that I do, and again, I go back in last year's plans, too, just to make sure that it's not just a copy and paste over to the current year's plan, to make sure that they're making the changes that they're needing, to make sure they're growing and pushing students in the right direction. So that's one of the things, and a needs assessment

362

01:09:37.470 --> 01:09:51.820

Makesia Sumpter: That's new for us in Title I, Part D, so that is a change that we did make, because we, of course, had needs assessment in our other grants, but wasn't necessarily a requirement in Title I, Part D application. It is now.

363

01:09:51.880 --> 01:10:08.709

Makesia Sumpter: And so that was new for them. I got a little pushback on that. Some of them didn't want to, of course, submit a needs assessment while their plans weren't approved. I can't determine your needs, and I can't tie your needs to the funding that you're requesting, or your allowability of the things.

364

01:10:09.570 --> 01:10:13.460

Makesia Sumpter: They had to end up doing that needs assessment for me.

365

01:10:13.460 --> 01:10:36.860

Makesia Sumpter: got a little pushback on it, but we're all good now, with that. I think they're kind of used to me now. It took almost 2 years for them to get used to me, but they're kind of used to me now. So, those are the improvements that we did make, making sure that now that a needs assessment is required. It wasn't required before. It was pretty much optional, but now it's required.

366

01:10:36.900 --> 01:10:43.990

Makesia Sumpter: So that's one of the changes we made to our application, and as far as allowability and reasonableness.

367

01:10:44.500 --> 01:10:46.559

Makesia Sumpter: We look at return on investment.

368

01:10:47.010 --> 01:10:53.420

Makesia Sumpter: So we want to make sure... my thing... my... my question is, What's the return on investment?

369

01:10:53.930 --> 01:11:07.580

Makesia Sumpter: for example, if you're putting down... if I'm looking at your data, and I'm looking at your needs assessment, and I'm seeing that there's a deficit, more of a deficit in ELA, but your bulk is going to math.

370

01:11:07.820 --> 01:11:11.720

Makesia Sumpter: then I'm going to ask you, you know, why is this the case?

371

01:11:11.720 --> 01:11:29.709

Makesia Sumpter: Don't you think most of it may need to go to ELA? Maybe flip it. Put the bulk of it in ELA, and, you know, flip-flop it and put the lesser amount in math. Make sure that you're looking at your students' needs. Make sure you're looking at the growth that needs to take place.

372

01:11:29.710 --> 01:11:30.940

Makesia Sumpter: in a... a...

373

01:11:30.940 --> 01:11:54.899

Makesia Sumpter: computers. We don't need to purchase computers and laptops every single year. So that's one of the things, too, I'm making sure that I'm paying attention to, because when they start requesting,

especially the laptops and Chromebooks, I want to go back into previous year's grant. Since I'm new, I can't remember... I don't know, I have to go back into other previous year's grants and see when was the last time

374

01:11:54.900 --> 01:11:56.540

Makesia Sumpter: And they purchased those things.

375

01:11:56.540 --> 01:12:06.330

Makesia Sumpter: So that's just some of the things that I do, just to make... and of course, looking at the use of, the allowable use of funds document, just to make sure that everything is in line there.

376

01:12:09.630 --> 01:12:10.560

Shannon Cranmore: Hi, Jessica.

377

01:12:10.560 --> 01:12:27.090

Jessica Fancher-Wyoming Dept. of Education: Yeah, okay. Well, I was gonna say, for me, the use of funds, that was the gray area. So that was probably one of the biggest areas that were addressed after monitoring. I ended up having to develop a cost limitation policy for

378

01:12:27.090 --> 01:12:41.139

Jessica Fancher-Wyoming Dept. of Education: the overall Title I, Part D, and then I worked with Shannon to make sure we were on the same page, and that both programs were addressed within that cost limitation policy, and that was...

379

01:12:41.140 --> 01:12:59.950

Jessica Fancher-Wyoming Dept. of Education: more focused on... well, I added, and I met multiple meetings with Obioma, Jeff, and Heather to make sure that I had every single statutory, regulatory reference cited in there, and then just a

380

01:12:59.950 --> 01:13:01.210

Jessica Fancher-Wyoming Dept. of Education: kind of quick...

381

01:13:01.460 --> 01:13:19.709

Jessica Fancher-Wyoming Dept. of Education: one-liner on what that meant. But, you know, obviously, CFR 200, 403, 404, 405 was really where, you know, necessary, reasonable, allocable goes. And, I spent a lot of time with sub-grantees.

382

01:13:20.450 --> 01:13:38.660

Jessica Fancher-Wyoming Dept. of Education: helping them understand the difference between what that meant, because, you know, when you look at

the CFR, it just says what necessary, reasonable, allocable mean. And, well, if they felt administrative functions were necessary.

383

01:13:38.660 --> 01:13:49.559

Jessica Fancher-Wyoming Dept. of Education: Then they targeted, you know, a quarter of their entire allocation to somebody running the grant, writing the grant, or reviewing the data.

384

01:13:49.610 --> 01:13:55.640

Jessica Fancher-Wyoming Dept. of Education: And so I had to kind of retrain their brains

385

01:13:55.760 --> 01:14:10.609

Jessica Fancher-Wyoming Dept. of Education: And I'm going to intertwine this with the policy, but retrain their brains. I focused heavily on them looking at whether the expense addressed a documented need.

386

01:14:10.660 --> 01:14:24.110

Jessica Fancher-Wyoming Dept. of Education: And Makisha, you talked about the comprehensive needs assessment. Well, we did not have that in place either, and I know Shannon created one for Subpart 1, and I was initially gonna

387

01:14:24.110 --> 01:14:30.989

Jessica Fancher-Wyoming Dept. of Education: kind of piggyback off hers, but then I realized that it... my popu... the population

388

01:14:30.990 --> 01:14:43.020

Jessica Fancher-Wyoming Dept. of Education: And the way that the LEAs under Subpart 2 and the facilities are structured was very different, so then I had to create a last-minute comprehensive needs assessment, just

389

01:14:43.050 --> 01:14:54.659

Jessica Fancher-Wyoming Dept. of Education: Two weeks ago, to go into our 2627 grant, so they're... they have those in place, and they're able to use that data.

390

01:14:54.660 --> 01:15:09.589

Jessica Fancher-Wyoming Dept. of Education: So, the other thing that I had to look at, use of funds-wise, was, what are kids already receiving? Like, what are kids... and I'm gonna... yep, Heather, I'm using it. I love this analogy, I use food analogies for everything, and..

391

01:15:09.590 --> 01:15:15.660

Jessica Fancher-Wyoming Dept. of Education: Heather talked about cake. All kids get to eat cake. So, what...

392

01:15:15.660 --> 01:15:32.700

Jessica Fancher-Wyoming Dept. of Education: were all kids supposed to get? Not just at-risk or delinquent kids, but what did all kids get? Well, they all got the core programming, you know, this... while it's not subject to supplement, not to plant for Subpart 2,

393

01:15:32.770 --> 01:15:40.350

Jessica Fancher-Wyoming Dept. of Education: everything needs to be supplemental. So all kids get cake, so I had to explain that to them. These kids

394

01:15:40.350 --> 01:15:53.210

Jessica Fancher-Wyoming Dept. of Education: They get the frosting, and the caramel sauce, and the sprinkles, and the cherries, and all that, depending on where that kid is. You gotta meet them where they're at, and that's how you address their needs, and that's how the grant application

395

01:15:53.210 --> 01:15:58.099

Jessica Fancher-Wyoming Dept. of Education: should be focused. It should be driven by your data.

396

01:15:58.120 --> 01:16:07.430

Jessica Fancher-Wyoming Dept. of Education: Targeting needs that you see kids that have the highest, greatest needs, and that the funds are going to make

397

01:16:07.470 --> 01:16:24.790

Jessica Fancher-Wyoming Dept. of Education: the most impact for these kids, versus spending the majority of your allocation or a quarter of it on grant management. So that was a big, huge shift. And then policy, I talked about, I wrote the

398

01:16:24.860 --> 01:16:34.380

Jessica Fancher-Wyoming Dept. of Education: policy cost limitations, that... that has been interesting. It was not well received by

399

01:16:34.500 --> 01:16:39.400

Jessica Fancher-Wyoming Dept. of Education: Subpart 2, some subpart 2 sub-grantees, but that's okay.

400

01:16:39.550 --> 01:16:55.169

Jessica Fancher-Wyoming Dept. of Education: And then I had a subgrantee guidebook, that I had already been using for a couple years, and it... Heather, when the team reviewed it, there were a couple things that I did not understand.

401

01:16:55.290 --> 01:17:07.490

Jessica Fancher-Wyoming Dept. of Education: for use of funds, you know, coordinating, daycare assistance, things like that. Well, I allowed them to pay for daycare, because if it was the...

402

01:17:07.870 --> 01:17:27.710

Jessica Fancher-Wyoming Dept. of Education: the end-all, be-all, and whether a parenting teen attended school or dropped out, and the district could pay \$240 a month for daycare, then I allowed it because I missed the coordination piece. So that did come out in monitoring, it was in my guidebook.

403

01:17:27.760 --> 01:17:47.269

Jessica Fancher-Wyoming Dept. of Education: So I had to pull the guidebook out of circulation so I could change those things, but it gave me an opportunity to also align it with some of the policy things that we wrote with... with regards to the CFR with necessary, reasonable, allocable, and

404

01:17:47.270 --> 01:18:01.510

Jessica Fancher-Wyoming Dept. of Education: It turned into... from a 12- to 15-page guidebook to now, I think it's like 40 pages. But now it's not a guidebook, it's now a tool that they can actually use. It's... it's more...

405

01:18:01.510 --> 01:18:07.480

Jessica Fancher-Wyoming Dept. of Education: In practice. And so, hopefully, when I roll it out.

406

01:18:07.480 --> 01:18:25.459

Jessica Fancher-Wyoming Dept. of Education: They won't see it as more of a policy rather than a tool that... like the toolkits that NDTAC offers. They'll see it as something that they can just kind of roll to as they're writing their grant application, or they're thinking about planning needs for kids.

407

01:18:25.460 --> 01:18:37.809

Jessica Fancher-Wyoming Dept. of Education: how do we target these funds? How are we using our data to impact programming? And how are we using it for our implementation strategies? And this

408

01:18:37.810 --> 01:18:41.010

Jessica Fancher-Wyoming Dept. of Education: Guidebook has examples.

409

01:18:41.010 --> 01:18:51.180

Jessica Fancher-Wyoming Dept. of Education: real-life examples so that LEAs will be able to utilize it in practice. So those were the policy changes or guidance changes that

410

01:18:51.280 --> 01:19:01.190

Jessica Fancher-Wyoming Dept. of Education: I identified, and the comprehensive needs assessment that allowed us Move forward positively.

411

01:19:02.080 --> 01:19:20.469

Shannon Cranmore: I agree with a lot of both of them said. One thing I will add real quick, and then we'll go into the little video from Virginia. But, with my subpart 1 program, we had one state agency that was utilizing the majority of their funding to pay for salaries for a couple of, aides.

412

01:19:20.680 --> 01:19:30.430

Shannon Cranmore: And staff. So, like, 90-95% of their grant was going just towards salaries. So, through monitoring, and working with Heather and Jeff.

413

01:19:30.430 --> 01:19:45.859

Shannon Cranmore: we determined that probably wasn't going to really move the needle on these kids, right? It wasn't going to make them more successful in school or with that transition. So that policy that Jessica was talking about that we worked on together, and she did the majority of the work on that.

414

01:19:45.860 --> 01:19:58.140

Shannon Cranmore: We did set salary caps within our state for administration and teachers, so we did set salary caps. We made sure we worked together and that our programs are aligned with the same percentages.

415

01:19:58.140 --> 01:20:10.339

Shannon Cranmore: And we worked really hard on that, so I will say that's something maybe to consider when you're looking at your grant application. If the majority of the funds is going to salaries, are you getting the best bang for your buck to make these kids successful?

416

01:20:10.360 --> 01:20:16.570

Shannon Cranmore: So do look at that. Christine, we'll go ahead and go to you real quick for that video, and then we'll come back.

417

01:20:16.900 --> 01:20:37.620

Kristine Chan, NDTAC: Sure, I'm gonna share a video from Garen Jay from Virginia. She was not able to make it today, but thankfully was able to record her presentation. So she has a 5-minute introduction, and I'm really just gonna highlight some of the slides that I think are really helpful, and we're uploading this PowerPoint so that you have access to that as well.

418

01:20:37.620 --> 01:20:40.330

Kristine Chan, NDTAC: So let me share my screen.

419

01:20:41.530 --> 01:20:50.929

Kristine Chan, NDTAC: And you can get to the PowerPoint. I'm gonna move to the next slide right now, where the audio is gonna begin on its own. And it's gonna happen in 3, 2, 1.

420

01:20:54.240 --> 01:20:55.600

Kristine Chan, NDTAC: Should be happening.

421

01:20:57.000 --> 01:20:58.539

Kristine Chan, NDTAC: Of course, it did not happen.

422

01:20:59.370 --> 01:21:02.880

Kristine Chan, NDTAC: One second,

423

01:21:06.460 --> 01:21:14.009

Kristine Chan, NDTAC: Hello, and thank you so much for the opportunity to present on behalf of the Virginia Department of Education.

424

01:21:14.740 --> 01:21:23.150

Kristine Chan, NDTAC: My name is Garen J. Richardson, and I am the Title I, Part D, Subpart 1, and Subpart 2 State Coordinator.

425

01:21:23.820 --> 01:21:27.500

Kristine Chan, NDTAC: Across Virginia, we have engaged in a pretty big lift.

426

01:21:27.670 --> 01:21:34.270

Kristine Chan, NDTAC: And we have been implementing a statewide effort to strengthen our Title I, Part D program.

427

01:21:34.540 --> 01:21:36.220

Jessica Fancher-Wyoming Dept. of Education: our processes.

428

01:21:36.220 --> 01:21:44.210

Kristine Chan, NDTAC: Are being strengthened through clearer eligibility procedures, stronger governance structures, improved documentation practices.

429

01:21:44.640 --> 01:21:48.519

Kristine Chan, NDTAC: And more sustainable systems of oversight, just overall.

430

01:21:49.090 --> 01:21:54.750

Kristine Chan, NDTAC: As many of you know, Title I, Part D programs are often pretty complex.

431

01:21:54.860 --> 01:22:10.039

Kristine Chan, NDTAC: They are working within complex environments to include agencies, facilities, school divisions, at-risk programs, LEAs, and over time, we recognize the need for more consistent statewide structures.

432

01:22:10.070 --> 01:22:28.500

Kristine Chan, NDTAC: So in response to that need, Virginia began implementing a framework focused on strengthening facility eligibility verification, standardizing annual documentation processes, updating application assurances, improving statewide communication systems.

433

01:22:28.500 --> 01:22:34.300

Kristine Chan, NDTAC: And aligning these efforts more intentionally with monitoring and technical assistance.

434

01:22:35.490 --> 01:22:38.310

Kristine Chan, NDTAC: The slides that I share, it is my hope that

435

01:22:38.530 --> 01:22:43.190

Kristine Chan, NDTAC: We are informing you of Virginia's approach to this really, really important work.

436

01:22:43.290 --> 01:22:53.349

Kristine Chan, NDTAC: We still have tons to do, folks. We have a lot to do, but we are working, and while this work continues to evolve, our focus remains extremely clear.

437

01:22:53.420 --> 01:23:05.050

Kristine Chan, NDTAC: We want to build sustainable systems that strengthen program integrity while ultimately improving services and supports for the most vulnerable youth across the state of Virginia.

438

01:23:07.560 --> 01:23:19.399

Kristine Chan, NDTAC: Why this work matters so much. As we evaluated our existing Title I, Part D processes across the state, we identified opportunities to strengthen our program.

439

01:23:19.480 --> 01:23:28.539

Kristine Chan, NDTAC: And our goal was not simply to update forms and procedures. Our goal was to strengthen statewide systems

440

01:23:28.660 --> 01:23:35.240

Kristine Chan, NDTAC: That support accountability, sustainability, and ultimately program integrity.

441

01:23:36.470 --> 01:23:48.299

Kristine Chan, NDTAC: Virginia's approach focused on, creating an integrated statewide framework rather than an isolated compliance task or compliance activities.

442

01:23:48.410 --> 01:24:00.010

Kristine Chan, NDTAC: We were intentionally aligning governance structures with our facility eligibility verification system, an annual certification procedure.

443

01:24:00.130 --> 01:24:19.680

Kristine Chan, NDTAC: documentation review, monitoring alignment, and technical assistance. And we did this to create one continuous statewide system. And this has been a really big lift. I think it's gonna be worth it when it's all over, and I think we will see so many, positive impacts.

444

01:24:19.970 --> 01:24:31.220

Kristine Chan, NDTAC: But right now, it's been a pretty big lift. The framework has helped establish clear expectations and stronger documentation practices across state agencies.

445

01:24:31.380 --> 01:24:36.700

Kristine Chan, NDTAC: facilities, and LEAs.

446

01:24:38.960 --> 01:24:55.960

Kristine Chan, NDTAC: We noticed that communication was a critical component of implementation. Virginia established a formal statewide communication process. We outlined the expectations, required

documentation, our timelines, and of course, we provided technical assistance supports.

447

01:24:56.010 --> 01:25:13.950

Kristine Chan, NDTAC: The communication helped ensure divisions and facilities both understood the purpose and the structure of the statewide review process. And we also wanted to ensure that the process was framed not only as compliance work, but as a part of a broader statewide effort to strengthen sustainability

448

01:25:14.020 --> 01:25:15.750

Kristine Chan, NDTAC: and program integrity.

449

01:25:17.600 --> 01:25:22.170

Kristine Chan, NDTAC: Our facilities are now required to participate in annual review.

450

01:25:22.180 --> 01:25:38.839

Kristine Chan, NDTAC: and recertification procedures, which are aligned with the federal statutory requirements, and we've noticed that it's created a more structured and sustainable statewide approach to eligibility oversight already. So I can't wait for the future and what's in store.

451

01:25:39.820 --> 01:25:48.020

Kristine Chan, NDTAC: So, I'm just gonna walk us through a few of these slides, and you can spend some time when you get the PowerPoint to just go through it.

452

01:25:48.020 --> 01:26:03.110

Kristine Chan, NDTAC: So the first one I want to highlight is slide 4, which just tells you a little bit about, the Virginia model. So just getting kind of the basics of what is the foundation, that drives, the Virginia model and how Title I, Part D is laid out here.

453

01:26:03.760 --> 01:26:21.460

Kristine Chan, NDTAC: Slides 6 and 7, I think, are really great, visuals to start thinking about how do you build a streamlined process? And you can see Garen Jay has kind of laid out how she thinks about, the work from the submission all the way to the monitoring stage.

454

01:26:21.460 --> 01:26:35.670

Kristine Chan, NDTAC: And then also, an instrument that she's developed... let me zoom in a little bit, she's given you copies of her eligibility certification form that you can copy and model off of the questions.

455

01:26:35.730 --> 01:26:47.409

Kristine Chan, NDTAC: And as you're building out the process, you always want to think of, you know, what should you expect if the changes were successful? And I love this slide because it lays out

456

01:26:47.560 --> 01:27:00.950

Kristine Chan, NDTAC: the problems and the challenges before some type of, like, statewide system change, and then what should you expect after if these changes are successful, right? So thinking really about the indicators

457

01:27:00.950 --> 01:27:25.779

Kristine Chan, NDTAC: of, where you should be if everything is implemented as, as, as expected. And so, she started to think about a checklist. How do you think about eligibility verification, monitoring, getting technical assistance to support this work, and then continuous improvement to ensure that the process, is stable and it continues, it continuously

458

01:27:25.780 --> 01:27:27.120

Kristine Chan, NDTAC: improves over time.

459

01:27:27.310 --> 01:27:38.829

Kristine Chan, NDTAC: And of course, how can data keep you on track? And so that is thinking about indicators that can help with, this oversight to ensure that your system is working.

460

01:27:38.930 --> 01:27:51.339

Kristine Chan, NDTAC: And then I'm gonna jump us to slide 13, because she's had some reflection questions for us, and I just want to read one of them, it being, what advice would you give to other states?

461

01:27:51.730 --> 01:28:06.020

Kristine Chan, NDTAC: Hershey says, start with governance clarity, standardize documentation early, and then build systems that can be sustainable beyond individual personnel and create internal systems to ensure sustainability.

462

01:28:06.020 --> 01:28:12.019

Kristine Chan, NDTAC: So please, please, if you get a chance, you know, do a coffee chat or check in with Garen Jay,

463

01:28:12.020 --> 01:28:22.689

Kristine Chan, NDTAC: to touch base on her expertise and kind of her process in kind of revising Virginia's process, and we hope to hear from her in other, spaces as well.

464

01:28:23.270 --> 01:28:33.890

Kristine Chan, NDTAC: Alright, I'm gonna stop the share, and I know we are about 4 minutes out. If we need to take a good, like, extra 5 to 10 minutes for questions, we're okay to adjust the schedule.

465

01:28:33.890 --> 01:28:51.380

Shannon Cranmore: Okay, perfect. So, I think I will just follow up with that, and Jessica and Makesha, you can just shake your head and agree. I'll try to kind of answer this last question for all of us. It has to do with strengthening your systems based on your monitoring findings. So, I think,

466

01:28:51.660 --> 01:28:55.340

Shannon Cranmore: I know Jessica and I, and I'm sure probably Makisha.

467

01:28:55.370 --> 01:29:15.100

Shannon Cranmore: My grant application is completely new this year. I did a huge overhaul on that. I know Jessica adjusted hers a little bit. I think Makisha said that she changed her grant application a little bit, too, based on this monitoring. I have also incorporated a needs assessment that they have to submit with their application. I know Makisha said she is, Jessica is.

468

01:29:15.170 --> 01:29:23.360

Shannon Cranmore: We're... I mean, we're looking at all of our policies, our procedures, our monitoring, our grant application, that needs assessment, all that documentation.

469

01:29:23.460 --> 01:29:31.980

Shannon Cranmore: I think all of us in some capacity have dove into that and updated it and make sure it was aligned with federal statute. Do you both agree?

470

01:29:34.680 --> 01:29:41.960

Jessica Fancher-Wyoming Dept. of Education: Yeah, I think for me, the biggest change was really strengthening expectations around planning.

471

01:29:41.980 --> 01:29:47.710

Jessica Fancher-Wyoming Dept. of Education: And yes, I did a complete overhaul of my grant application, and so...

472

01:29:47.710 --> 01:30:03.950

Jessica Fancher-Wyoming Dept. of Education: I would... shifting away from broad descriptions to more intentional planning based on what their data says, describing their major milestones that they expected to achieve with programming.

473

01:30:03.950 --> 01:30:08.360

Jessica Fancher-Wyoming Dept. of Education: And what those implementation strategies would look like.

474

01:30:09.910 --> 01:30:21.009

Makesia Sumpter: And I would agree with Jessica. We want to make sure that everything is intentional. And of course, 1,000% student growth focused. We want to push the needle.

475

01:30:21.010 --> 01:30:35.099

Makesia Sumpter: So, and again, I don't want copies and pastes from last year, so we want to make sure that they are doing everything that they need to do to ensure that once we're meeting compliance and guidelines, and that they're doing what they need to do to push the needle.

476

01:30:35.100 --> 01:30:41.139

Makesia Sumpter: to ensure that there's student growth there. And everything, again, ties back to that needs assessment.

477

01:30:42.000 --> 01:30:47.979

Shannon Cranmore: Absolutely. Alright, so we'll go ahead and see if we can get in a question or two, if anybody has any.

478

01:30:51.160 --> 01:30:56.020

Kristine Chan, NDTAC: Just gonna unpin the screen so that you can get, kind of, everybody on the same...

479

01:30:56.540 --> 01:30:59.170

Kristine Chan, NDTAC: Screen, so one second.

480

01:31:01.170 --> 01:31:01.850

Christina Endres, NDTAC: Whoa.

481

01:31:01.850 --> 01:31:09.960

Shannon Cranmore: If you guys think of questions afterwards, please feel free, I'm sure, to reach out to any of us. We would be more than happy to tell you our experience, or...

482

01:31:10.270 --> 01:31:12.200
Shannon Cranmore: Or help you through that process.

483
01:31:13.460 --> 01:31:14.190
Christina Endres, NDTAC: Perfect.

484
01:31:14.540 --> 01:31:29.869
Christina Endres, NDTAC: One question that did come up that I... it was a little bit ago, so I'm just gonna scroll back up to it a little bit, is, Makisha, people were really interested in your eligibility form as well, and so they were wondering if you would be willing to share that.

485
01:31:30.580 --> 01:31:34.510
Makesia Sumpter: I will, and can share it, but I want to...

486
01:31:34.510 --> 01:31:54.799
Makesia Sumpter: updated for this upcoming eligibility review. Last year, first year out the gate. So, I do... I did see that I needed to make changes and update that from last year, so once I get it updated, which should be by the end of June, before I push it out for this round of eligibility, I can definitely share that out with whoever wants it.

487
01:32:00.760 --> 01:32:03.210
Shannon Cranmore: And I do see...

488
01:32:03.790 --> 01:32:23.409
Shannon Cranmore: Moi, you asked if you could meet with us. Absolutely. I'm gonna go ahead and throw my email in chat, if you guys want to reach out to me, and I can coordinate with Jessica, or if you've reached out to her before. We're... I... we probably wouldn't be able to meet with you till the end of June, because we're... our next month is packed, but we would definitely meet with you at some point.

489
01:32:23.620 --> 01:32:25.580
Shannon Cranmore: Any other questions?

490
01:32:39.180 --> 01:32:48.309
Christina Endres, NDTAC: Okay, we had another one that came in, asking if you do, eligibility determinations, for all facilities every year.

491
01:32:49.720 --> 01:32:51.429
Shannon Cranmore: I will be going forward.

492
01:32:52.030 --> 01:33:00.619

Makesia Sumpter: Prior to our audit, we weren't, but we are going forward with that every year now, and it's an annual thing now.

493

01:33:01.330 --> 01:33:11.520

Jessica Fancher-Wyoming Dept. of Education: I would agree with Makisha. Prior to the audit, yeah, we didn't, but moving forward, for some facilities.

494

01:33:11.800 --> 01:33:29.519

Jessica Fancher-Wyoming Dept. of Education: they... they're always serving the same population. They're all adjudicated, so maybe not as frequent for those, but for the ones that passed with just two court orders, and a couple others, yes, every year.

495

01:33:31.080 --> 01:33:35.940

Shannon Cranmore: And then Kathy had a question, Jessica, about wondering on our salary caps.

496

01:33:36.040 --> 01:33:44.229

Shannon Cranmore: Are they absolute, or... or do you depart if justified? For mine, I... this first year, they... they are sticking to that. I am not...

497

01:33:44.500 --> 01:33:48.410

Shannon Cranmore: There's no leeway in those caps at all.

498

01:33:48.410 --> 01:34:06.510

Jessica Fancher-Wyoming Dept. of Education: Yeah, no, we actually... we, without knowing it, each of us did a lot of research to determine what that would look like, and found that across the U.S, most states, actually, for this program, do an administrative cap of 5-10%.

499

01:34:06.650 --> 01:34:13.960

Jessica Fancher-Wyoming Dept. of Education: Of the total allocation, and so that's... we both settled on 5%, because we really felt like

500

01:34:13.970 --> 01:34:31.840

Jessica Fancher-Wyoming Dept. of Education: the majority of the funds needed to directly provide services to kids. That's what drives the needle, that's where you see the most bang for your buck and program impact, and where you see kids getting what they need, and you see the best outcomes.

501

01:34:33.320 --> 01:34:34.000

Kathy Cross - DESE Massachusetts: X.

502

01:34:39.540 --> 01:34:50.449

Shannon Cranmore: All right. Well, I said, if you all think of any other questions or want to reach out to any of us directly, please feel free to do so. And I think, Christine, we can throw it back over to you. Thank you all for..

503

01:34:50.620 --> 01:34:52.329

Shannon Cranmore: For listening to us today.