

# STRENGTHENING STATEWIDE SYSTEMS FOR TITLE I, PART D

Virginia's Approach to Facility Eligibility, Governance, and  
Program Integrity

Gueringe' Richardson, M.Ed., M.S.  
Title I, Part D, Subpart 1 and 2, State Coordinator  
Virginia Department of Education

VIRGINIA DEPARTMENT OF EDUCATION



## DISCLAIMER

This presentation was planned under a grant from the U.S. Department of Education (USED). However, the content does not necessarily represent the policy of the USED, and you should not assume endorsement by the federal government.

# WHY STRENGTHENING WAS NECESSARY



## Key Challenges Identified

- Inconsistent eligibility documentation
- Varying facility verification practices
- Limited statewide standardization
- Need for stronger monitoring alignment
- Sustainability and accountability concerns

# THE VIRGINIA MODEL

Virginia's integrated statewide strengthened framework

- Building stronger statewide systems and oversight
- Strong student outcomes require strong statewide systems
- We identified opportunities to strengthen statewide consistency regarding eligibility verification and monitoring alignment.



# ESTABLISHING STATEWIDE EXPECTATIONS

## Communication, timelines, and technical assistance

- Statewide outreach to divisions and facilities
- Formal audit notification process
- Clear documentation expectations
- Technical assistance support



Subject: Notification of Title I, Part D, Facility Eligibility Audit

Good morning/afternoon, Title I, Part D, Coordinator,

As part of our ongoing efforts to strengthen program integrity and ensure alignment with federal requirements, the Virginia Department of Education will conduct a statewide Title I, Part D, eligibility audit of all participating delinquent facilities.

The purpose of this review is to verify that each facility meets federal statutory eligibility requirements under Title I, part D, including but not limited to:

- Facility designation as an eligible delinquent institution
- Provision of a regular program of instruction
- Student age eligibility
- Length of stay requirements (as applicable)
- Required documentation supporting October count data (if applicable)
- Current formal agreement (for Subpart 2 programs)

This review is designed to ensure continued eligibility for funding, strengthen accountability, and maintain compliance with U.S. Department of Education expectations.

### **Required Action**

Each division/facility must submit the following documentation:

1. Completed Title I, Part D, Facility Eligibility Verification Form (attached)
2. Official documentation of facility designation (all facility chartering documents)
3. Confirmation that the facility provides a regular program or instruction (weekly)
4. Length of stay calculations documentation (students stay an average of 30 days)
5. Age eligibility documentation
6. Current signed formal agreement with clear delineation of roles and transition procedures outlined (signed MOU/Agreement of Services)

**All required documentation must be submitted no later than June 1, 2026.**

We appreciate your cooperation in this important process. This review supports the continued integrity and sustainability of Title I, part d, programming statewide

If you have questions regarding this audit, please contact Gueringe' Richardson at [Gueringe.Richardson@doe.virginia.gov](mailto:Gueringe.Richardson@doe.virginia.gov).



# STANDARDIZED STATE AUDIT INSTRUMENT

## Formalized statewide eligibility review process

–Virginia Department of Education

### Title I, Part D, Facility Eligibility Certification Form (Annual Certification Form)

**Purpose:** This form is used to verify facility eligibility for participation in Title I, Part D programs and to support annual review, monitoring, and statewide records management.

#### Facility Information

| Field               | Fillable Space |
|---------------------|----------------|
| Division / LEA Name | _____          |
| Facility Name       | _____          |
| Facility Type       | _____          |
| Physical Address    | _____          |
| Mailing Address     | _____          |
| Administrator Name  | _____          |
| Administrator Title | _____          |
| Administrator Email | _____          |
| Administrator Phone | _____          |
| Reporting Year      | _____          |

#### Student Population & Residency Data

| Field                               | Fillable Space |
|-------------------------------------|----------------|
| Total Students Residing in Facility | _____          |
| Students Ages 5–17                  | _____          |
| Students Ages 18–21                 | _____          |
| Average Length of Stay (Days)       | _____          |
| Data Snapshot Date                  | _____          |

#### Program Operations & Educational Services

Does the facility provide daily educational services?

Yes  No

Who operates the instructional program?

- Local School Division
- Facility Staff
- Contracted Provider
- Regional Program
- Other: \_\_\_\_\_

Facility Classification

- Secure
- Non-Secure
- Staff-Secure
- Residential Treatment
- Other: \_\_\_\_\_

#### Youth Population Served

Youth served are primarily identified as:

- Adjudicated Delinquent
- Neglected
- At-Risk
- Mixed Population
- Other: \_\_\_\_\_

Basis for classification documentation maintained on file:

- Yes  No

#### Eligibility Certification & Assurances

Please check each item below as applicable:

- Facility serves eligible youth populations consistent with Title I, Part D requirements.
- Facility maintains documentation supporting eligibility and student counts.
- Facility will notify the Division/LEA of material program changes.
- Facility records may be reviewed during monitoring, audit, or program oversight activities.
- Information submitted on this form is accurate to the best of my knowledge.

#### Certification Statement

I certify that the information provided above is accurate and that this facility meets the eligibility requirements for participation in Title I, Part D programs. I understand that this certification may be reviewed during monitoring or audit processes.

#### Signatures

| Signature Field                                   | Fillable Space |
|---|----------------|
| Facility Administrator Signature                  | _____          |
| Date  | _____          |
| LEA Authorized Official Signature (if applicable) | _____          |
| Date  | _____          |

#### Submission Instructions and Retention Notice

Submit completed form and supporting documentation in accordance with current VDOE Title I, Part D, guidance. Maintain a signed copy and supporting records locally for monitoring and audit purposes.

# BEFORE & AFTER STRENGTHENING SYSTEMS

## Transitioning to sustainable statewide systems

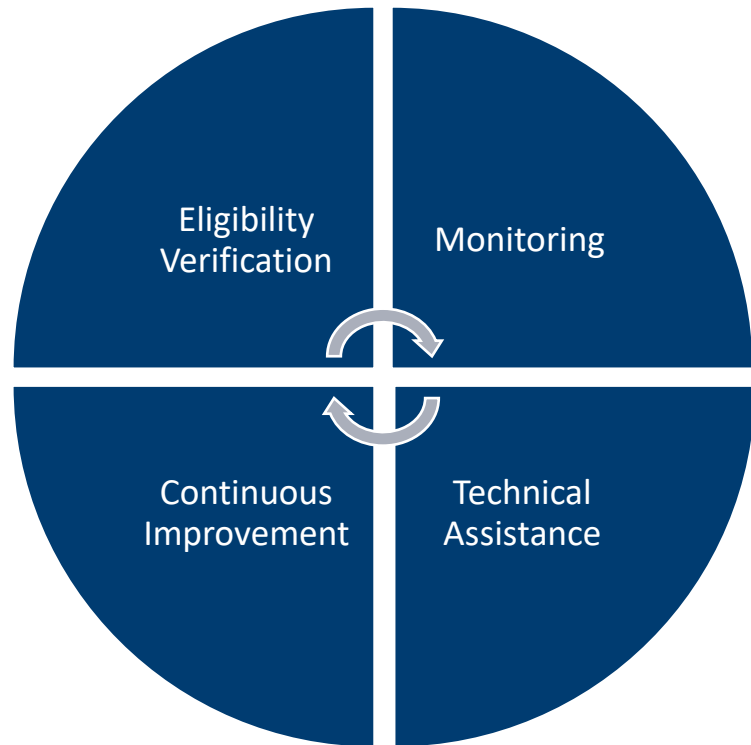
### BEFORE

- Inconsistent documentation
- Fragmented oversight
- Informal verification
- Limited standardization

### AFTER

- Annual certification
- Statewide audit tool
- Monitoring alignment
- Sustainable governance

# ALIGNING ELIGIBILITY & MONITORING

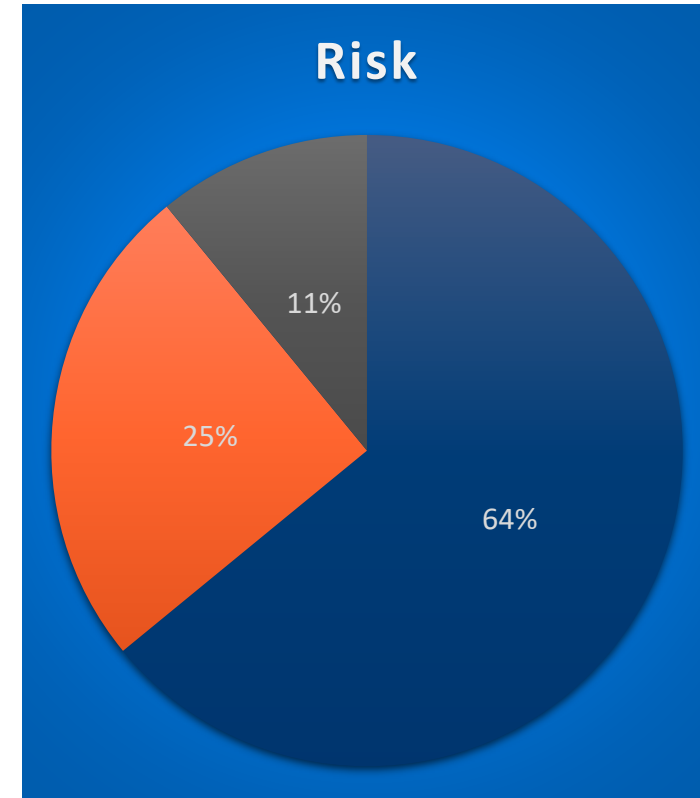


| Facility Eligibility Checklist |  |                    |          |
|--------------------------------|--|--------------------|----------|
| Division / LEA: _____          |  | Review Date: _____ |          |
| Facility Name: _____           |  | Reviewer: _____    |          |
| Core eligibility               |  |                    |          |
| Check                          | Item   | Yes / No / N/A     | Notes    |
| <input type="checkbox"/>       | Serves youth ages 5–17   |                    |          |
| <input type="checkbox"/>       | Youth count for review period is documented                      |                    |          |
| <input type="checkbox"/>       | Average length of stay is at least 30 days                       |                    |          |
| <input type="checkbox"/>       | Educational services are provided                                |                    |          |
| <input type="checkbox"/>       | Population is delinquent/neglected or otherwise program-eligible |                    |          |
| <input type="checkbox"/>       | Operator is public or otherwise authorized                       |                    |          |
| Required documentation         |  |                    |          |
| Check                          | Item   | Yes / No / N/A     | Notes    |
| <input type="checkbox"/>       | Facility description / program overview on file                  |                    |          |
| <input type="checkbox"/>       | Enrollment roster or census on file                              |                    |          |
| <input type="checkbox"/>       | Length-of-stay verification on file                              |                    |          |
| <input type="checkbox"/>       | Education program description / schedule on file                 |                    |          |
| <input type="checkbox"/>       | Governance / operating authority documentation on file           |                    |          |
| <input type="checkbox"/>       | Annual facility certification is signed and received             |                    |          |
| Determination                  |  |                    |          |
| Check                          | Item   | Result             | Notes    |
| <input type="checkbox"/>       | All core requirements met  |                    |          |
| <input type="checkbox"/>       | All required documents received                                  |                    |          |
| <input type="checkbox"/>       | Open monitoring findings reviewed                                |                    |          |
| <input type="checkbox"/>       | Final determination recorded in workbook                         |                    |          |
| Decision:                      | Eligible / Conditional / Not Eligible                            | Follow-up:         | Yes / No |

# RISK INDICATORS & OVERSIGHT

## Risk Indicators

- Incomplete documentation
- Length-of-stay concerns
- Unclear instructional programming
- Inconsistent student counts
- Facility operational changes



# WHERE VIRGINIA IS GOING NEXT

- **2025**

Framework Development

- **2026**

Implementation & Statewide Alignment

- **Future**

Integrated Monitoring Systems  
Continuous Improvement Long-Term  
Sustainability



# LESSONS LEARNED

- Strong communication matters
  - Provide continuous outreach and support to LEAs and Facilities
- Standardization reduces confusion
  - Send reminder emails
- Sustainable systems require annual review
- Governance and technical assistance must work together
  - Provide regular TA
- Monitoring alignment strengthens program integrity
  - Assess program implementation and efficacy, continuously

**Subject:** Annual Renewal – Title I, Part D Facility Eligibility Certification

Good morning,

This is a reminder that annual renewal of the Title I, Part D, Facility Eligibility Verification is required for the current program year.

As outlined in the certification form, facility eligibility must be reviewed and re-certified annually to ensure continued alignment with federal requirements. Divisions are responsible for confirming that each participating neglected or delinquent facility continues to meet statutory eligibility criteria and that all supporting documentation remains current.

Please submit the completed renewal certification and any updated documentation no later than **[Insert Deadline Date]**.

If there have been any material changes to facility designation, population served, instructional programming, length of stay, or formal agreements, those updates must be reported as part of the renewal submission.

Continued receipt of Title I, Part D, funds is contingent upon verified eligibility and timely submission of annual certification.

If you have any questions, please do not hesitate to reach out.

Thank you for your prompt attention to this requirement.

Warm regards,  
Gueringe Richardson

# QUESTIONS

Was there resistance?”

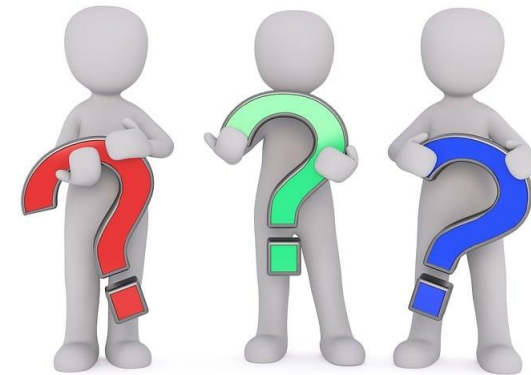
“As with any systems transition, there were questions initially, but our emphasis on communication, technical assistance, and partnership has helped support implementation.

What makes Virginia’s model effective?”

“The intentional alignment between eligibility verification, communication systems, application structures, and monitoring expectations makes the structure effective.

What advice would you give other states?”

“Start with governance clarity, standardize documentation (early), and build systems that can be sustained beyond individual personnel. Create internal systems so ensure sustainability.”



# CONTACT INFORMATION

## **Gueringè Richardson**

Title I Part A (Regions 4 & 8)

- Title V, Part B, Subpart 2 (Regions 3, 5, 7)

Title I, Part D, State Coordinator

[Gueringe.Richardson@doe.virginia.gov](mailto:Gueringe.Richardson@doe.virginia.gov)

Phone: (804) 750-8146