

Monitoring Updates: OESE's Consolidated Monitoring and OSSA's Program Monitoring

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Monitoring Principles and Objectives

The Department monitors to:

- Gather evidence from States and subgrantees to assess the effectiveness of State activities, including guidance, monitoring, and technical assistance
- Understand implementation and needs of programs to support Department technical assistance and guidance
- Share good practices observed at the State and local levels



Monitoring selection is based on risk assessment that includes recent history of monitoring visits, staff turnover, and other fiscal and programmatic risk indicators.

Monitoring is limited by staff capacity on each program and tailored to each program's requirements.



Monitoring Overview

Current Monitoring Activity	Monitoring in FY 2022
Consolidated Monitoring	Including cross-fiscal issues; Title I-A (including foster care), I-B, I-C, II-A, III-A, IV-A, RLIS, ESF
Title I, Part A	Piloted targeted monitoring in FY22 of two resource equity requirements
Title II, Part A	Part of consolidated monitoring but also piloted a targeted monitoring in two states
21 st Century Community Learning Centers	Monitoring four states in FY22; also conduct biannual calls with every state
Education for Homeless Children and Youth (EHCY) & American Rescue Plan – Homeless Children and Youth	Previously included in consolidated monitoring; piloted stand-alone monitoring for these 2 programs in FY22 with four states
Title I, Part D	Standing up pilot protocol with 3 states in FY23



OESE Consolidated Monitoring Update



FY 2023 Consolidated Monitoring Plans

The primary goal of Consolidated Monitoring is to ensure that implementation of Federal programs is consistent with applicable requirements, including the fiscal, administrative, and select program requirements contained in:

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance: 2 Code of Federal Regulations (C.F.R.) Part 200);
- Education Department General Administrative Requirements (EDGAR); and,
- Elementary and Secondary Education Act (ESEA), as amended.



FY 2023 Consolidated Monitoring Plans

Goals of Consolidated Monitoring:

- To encourage collaboration and cross-program coordination in order to improve the effectiveness of Federal programs in helping all students reach high standards of academic achievement.
- To provide technical assistance to grantees on cross-cutting and program-specific issues.
- To ensure program integrity by verifying compliance with Federal statutes and regulations.
- To reduce the burden monitoring reviews can place on grantees.



FY 2023 Consolidated Monitoring Plans

Estimated 18-month process



FY 2023 Consolidated Monitoring Plans

For FY 2023, the covered programs may include*:

Program	CFDA
Title I, Part A – Basic Grants to LEAs	84.010A
Title I, Part B – Grants for State Assessments	84.369A
Title I, Part C – Migrant Education Program	84.011A
Title II, Part A – Supporting Effective Instruction	84.367A
Title III, Part A – English Language Acquisition: State Formula Grant Program	84.369A
Title IV, Part A – Student Support and Academic Enrichment Program	84.424A
Rural and Low-income School Program	84.358B
Demonstration Grants for Indian Children	84.299A

*will vary based on the State context and the OESE program office's capacity and needs.



FY 2023 Consolidated Monitoring Plans

For FY 2023, OESE may also include Education Stabilization Fund (ESF) programs such as:

- Elementary and Secondary School Emergency Relief Fund (ESSER);
- Governor's Emergency Education Relief Fund (GEER); and,
- Emergency Assistance for Non-Public Schools (EANS).

The Department will also continue to conduct program-specific engagements for ESF programs.



Consolidated Monitoring – Common Findings

Cross-cutting fiscal requirements:

- Lack of written procedures
 - *E.g.*, Determining cost allowability; internal controls, equipment management and disposition
- Internal controls
 - Lack of segregation of duties; documentation of an internal risk assessment process
- Guidance to LEAs & subrecipient monitoring
 - *E.g.*, Equipment management; procurement policies, FERPA and protection of PII



Consolidated Monitoring – Common Findings

Cross-cutting fiscal requirements continued:

- Audit
 - Failure to conduct audits in a timely manner
 - No management decision letter issued to resolve audit findings
 - Failure to maintain documented audit resolution procedures

Program-specific:

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



Consolidated Monitoring – Recent Best Practices

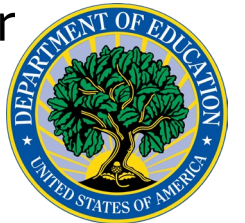
- During the review:
 - Walkthrough of key systems (grant management, local applications, data and reporting)
 - Using clear references to and naming conventions for supporting documentation
 - Not submitting hyperlinks to web-based resources



Consolidated Monitoring – Recent Best Practices

Commendations

- Kentucky Department of Education
 - Excellent work to ensure that LEAs accurately assess Title I, Part A comparability
- Nevada Department of Education
 - The Clark County Title II, Part A evaluation report is exemplary
- Nebraska Department of Education
 - Developed a feature for its local report cards to allow the comparison of a specific school or LEA against 12 schools or LEAs on a range of information published on report cards (Title I, Part A)
 - Provided LEAs TA on developing a comprehensive needs assessment for Title IV-A



Common Title I, Part A Monitoring Issues



Adjusted Cohort Graduation Rate (ACGR)

- ESEA section 8101(25) defines the adjusted cohort graduation rate as the number of students who graduate from high school in four years with a *regular high school diploma*, plus all students with the most significant cognitive disabilities who are assessed using an alternate assessment aligned with alternate academic achievement standards under section 1111(b)(2)(D) of the ESEA and who graduate with a State-defined alternate diploma, divided by the number of students who form the adjusted cohort for the graduating class.
- The cohort is based on the number of students who enter grade 9 for the first time adjusted by adding into the cohort any student who transfers in later during grade 9 or during the next three years and subtracting any student from the cohort who transfers out, emigrates to another country, transfers to a prison or juvenile facility, or dies during that same period.



Adjusted Cohort Graduation Rate (ACGR)

- ESEA section 8101(43) defines regular high school as:
 - The standard high school diploma awarded to the preponderance of students that is fully aligned with State standards, or a higher diploma (except that a regular high school diploma shall not be aligned to the alternative academic achievement standards in ESEA section 1111(b)(1)(E)) and
 - Does not include a recognized equivalent of a diploma, such as a general equivalency diploma certificate of completion, certification of attendance, or similar lesser credential.



Adjusted Cohort Graduation Rate (ACGR)

Common monitoring findings:

- 1) States are including students who do not earn a regular high school diploma (e.g., a diploma aligned to IEP standards) in the numerator of the ACGR.
- 2) In order to remove a student from the ACGR, the LEA must maintain documentation. State guidance or monitoring is insufficient to ensure LEAs are maintaining appropriate documentation.
- 3) Students are removed from the cohort for reasons that are not consistent with ESEA requirements.



Educator Equity

- ESEA section 1111(g)(1)(B) requires each State to describe how low-income and minority children in *Title I, Part A schools* are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers.
 - Each SEA must publicly report its progress with respect to any disproportionate rates.
- Common issues:
 - Not addressing low-income and minority students in *Title I, Part A schools*
 - Using 2015 State and LEA Educator Equity plans to meet the new requirement in the ESEA, as amended by the Every Student Succeeds Act
 - Reporting only educator information required on State and local report cards, rather than progress in addressing disproportionate rates of access to educators for this requirement



State and Local Report Cards

- ESEA section 1111(h) outlines all requirements for State and local report cards.
- Common missing elements include:
 - Educator data (i.e., teachers who are inexperienced, out-of-field, and teaching with emergency credentials in low and high poverty schools)
 - Note this is different than the requirement to publicly report the disproportionate rate of access for minority and low-income students in Title I schools to ineffective, inexperienced, and out-of-field teachers in ESEA section 1111(g)(1)(B)
 - Specific subgroup information, including students experiencing homelessness, children in foster care, and military-connected youth
 - Accountability information, such as results on the Other Academic indicator for elementary and secondary schools that are not high schools
 - ESEA section 1003 awards and interventions
- [Opportunities and Responsibilities for State and Local Report Cards Non-Regulatory Informational Document \(March 28, 2019\)](#)
 - State and Local Checklist for Report Card Elements – [Appendix A](#)



ED Review of Report Cards

- There continues to be broad interest in compliance with report card requirements, including by Congress and stakeholders
- Each year, SSA reviews State report cards and selected local report cards for compliance with specific reporting requirements in ESEA section 1111(h).
- For the 2020-2021 school year, SSA's review included:
 - Assessment participation and results, including reporting of military-connected, students in foster care, and students experiencing homelessness,
 - Per pupil expenditure (PPE) data from the 2019-2020 or 2020-2021 school year, and
 - Disaggregated chronic absenteeism data (as required in the 2020-2021 accountability and school identification waiver assurances)
- ED will be sending letters to States in cases where missing data was not posted to report cards following informal follow-up with the State.



ED Review of Report Cards

- Although there is no statutory deadline, 39 States published some information on State and local report cards by January 15, 2022
- All States have posted disaggregated assessment data
 - Most States included the new subgroups: military-connected, students in foster care, and students experiencing homelessness
- Most States have reported PPE data
 - Most reported data disaggregated by:
 - Actual personnel/actual non-personnel expenditures, and
 - Funding level (Federal, State and/or local)



Targeted Monitoring of Resource Equity Provisions



Targeted Monitoring of Resource Equity Provisions

- SSA is piloting a targeted monitoring protocol with 9 States on certain related resource equity requirements under the ESEA:
 - A State must periodically review resource allocation to support school improvement for each school district in the State serving a significant number of CSI, TSI and/or ATSI schools (ESEA section 1111(d)(3)(A)(ii))
 - CSI and ATSI plans must **identify resource inequities**, which may include a review of LEA and school-level budgeting, **to be addressed through implementation of the plan**. (ESEA section 1111(d)(1)(B)(iv) and (2)(C))



Targeted Monitoring of Resource Equity Provisions

- SSA selected States (CO, CT, IA, KY, MA, NC, RI, SC, and UT)
 - Criteria for State selection included:
 - Year of last OESE consolidated monitoring for the SEA
 - Likelihood that the SEA has already conducted a resource allocation review and/or developed its procedures and protocols
 - Geographic and enrollment size diversity
 - One State volunteered
- States completed self-assessments and submitted supporting documentation
- SSA reviewed documentation to draft questions, provided as an agenda one week prior to a monitoring call
- States and SSA held a two-hour call to discuss question generated by SSA's review
- Final document to be sent to each State with results of the pilot, which may include commendations, recommendations and required actions (*currently in progress*)



Targeted Monitoring of Resource Equity Provisions

Preliminary Observations

- Resources included in periodic review by SEA most often include:
 - Fiscal resources (e.g., Federal school improvement funding, various State and local funding streams)
 - Staffing resources (e.g., number of full-time equivalent teachers per student, percent of teachers with a provisional license, average teacher salaries)
 - Other resources (e.g., access to programs in schools, percentage of students enrolled in kindergarten and/or preschool)
- Processes
 - Integration of periodic review by SEA into existing processes
 - Timeline aligned to the general school improvement process
 - Innovative tools to analyze resources
 - Varied approaches to communicate results



Monitoring Updates: Teachers, Leaders, and Special Populations Group



Education for Homeless Children and Youth (EHCY) & American Rescue Plan Homeless Children and Youth (ARP-HCY)

- Monitored 4 states in FY 2022, with plans to monitor 6-9 states in FY 2023
- Interviewed 4 LEAs per state, both subgrantees and non-subgrantees
- Reviewed and discussed LEA homeless enrollment, chronic absenteeism and adjusted cohort graduation rate (ACGR) data published on ED Data Express (<https://eddataexpress.ed.gov/>)
- The Department is finalizing the monitoring reports from the four States reviewed in FY 2022 and will be posting shortly.
- Initial analysis indicates that more attention by SEAs is needed in analyzing LEA homeless student enrollment and performance data to identify LEAs for subrecipient monitoring and to provide technical assistance, both for subgrantee LEAs and all LEAs.
- We also observed innovative and effective uses of funds at the local level. For example, a school in Kansas was being converted into a family transitional housing program with supportive service providers co-located at the site.



Title II, Part A

- In FY 2022, monitored 2 States in program-specific monitoring in addition to State reviewed in consolidated monitoring.
 - Missouri reviewed in June; report pending
 - Pennsylvania reviewed in July; report pending
- Program-specific monitoring followed a similar protocol to consolidated monitoring, except no LEAs were reviewed.
- The Department plans to monitor 2 states though program-specific monitoring in FY 2023, in addition to consolidated monitoring. States to be monitored in FY 2023 have not yet been identified.
- Frequent Title II-A findings include concerns related to the statutory definition of professional development and meaningful consultation with private school officials related to equitable services.



Title I, Part D

- In Fall 2022, Title I, Part D will collaborate with NDTAC to implement a new monitoring process.
- Three (3) States, along with a selection of their subgrantees will be monitored: Massachusetts, New Mexico, and Alabama
- States were selected based on a risk assessment that includes factors such as performance on GPRA measures, data reporting, turnover in State Coordinators, and fiscal concerns such as large unspent balances.
- The initial monitoring process and protocols will be piloted over the next 2-3 years. We will collect feedback and adjust accordingly.



Contact Information

All monitoring reports are posted here: <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/performance-review/>

Title I, Part A

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Title I, Part B

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Title I, Part D

Titlei-d@ed.gov

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HomelessED@ed.gov

Title II, Part A

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Title III, Part A

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