

TIPS ON PREPARING FOR A TITLE I, PART D, FEDERAL MONITORING REVIEW

States can prepare for their next review by understanding the Title I, Part D, Federal monitoring process and having information about the issues that States typically face during a Federal monitoring review. Although preparing for the review may seem overwhelming, especially for new Part D Coordinators, the larger purpose of the monitoring process is important to keep in mind.

- **Meeting compliance requirements for the Title I, Part D, program is important.** The Federal monitoring indicators represent the backbone of the Title I, Part D, program. If SEAs have the correct policies and procedures in place, then children who are neglected, delinquent, or at-risk have a higher likelihood of receiving a fair, equal, and significant opportunity to obtain a high-quality education.
- **Meeting compliance requirements for the Title I, Part D, program is possible.** In addition to benefitting students, if SEAs have correct policies and procedures in place, then the Federal monitoring review should go smoothly. Based on the 5-year examination of Title I, Part D, reviews, most States were already compliant with nearly all monitoring indicators to start,⁵ and SEAs that received findings during their first review were able to resolve them by the following review.⁶

With this in mind, the final section of this guide provides practical tips on how Part D Coordinators (and their teams)⁷ can approach the review process efficiently and effectively and meet the compliance requirements for the Title I, Part D, program. In addition, these tips may identify ways to improve an N or D program, even if a review is not in the immediate future.

The first set of tips is broken down by activities to do before the review, during the review, and after the review. The second set provides detailed tips for each of the current Title I, Part D, monitoring indicators—including background information to review, ways to assess your compliance, and how to address areas in which you are not compliant.

The tips are written for and addressed to Part D Coordinators but are intended to be relevant for all staff and team members who are preparing for a Title I, Part D, Federal monitoring visit. Both sections are formatted as checklists so that they can be copied, adapted, and/or shared during the monitoring preparation process.

⁵ Based on the results of each State's most recent Title I, Part D, Federal monitoring review during a 5-year period from FY 2003–04 to FY 2007–08, the majority (58 percent) of States had either zero findings or one finding to resolve as a result of the most recent review.

⁶ Based on an analysis of the progress that States have made since SASA instituted its new monitoring framework, 32 of the 34 findings (94 percent) from the first review were rectified by the time States were reviewed a second time.

⁷ A team may include additional State staff (e.g., staff responsible for managing data and staff and consultants responsible for subgrantee monitoring) and subgrantee representatives. Team members should be knowledgeable about each indicator and be able to speak to the requirements.

START TO FINISH: TIPS FOR PARTICIPATING IN A FEDERAL MONITORING REVIEW

Pre-Review

Pre-Contact With SASA

States often think that the pre-review process begins with a call from SASA regarding the upcoming review. To put your best foot forward, think ahead, even before getting that call. By starting earlier, you will have time to understand the current monitoring indicators, assess your State's compliance with those indicators, and adjust policies and practices as necessary. Even if a review is not scheduled, you should become familiar with the current Title I, Part D, monitoring indicators and have a process in place to periodically organize and review documents. The following list identifies steps that you and your team can take in advance.

- Familiarize yourself with each monitoring indicator (see respective *Background Information* by indicator on pages 21–30).
- Check when your State was last reviewed to determine the possibility of being reviewed during the next cycle.
- Review your last Federal monitoring report and any corrective action materials and identify any findings that your SEA received during the last review. For a copy of your last monitoring report, go to <http://www.ed.gov/admins/lead/account/monitoring/index.html>. For a copy of the required written response sent to ED after your SEA received the monitoring report, contact your Title I Director.
- Identify your program's team at each level (SEA, SA, and LEA, if there is a Subpart 2 program). Include people who are knowledgeable about each indicator and can speak to the requirements.
- Locate the materials for which SASA will request at least 2 months in advance of your review, including:
 - A copy of your SEA Title I, Part D, State plan
 - A copy of the process that you use to award and distribute Subpart 1 and Subpart 2 grants, including a list of all current subgrantees and award amounts
 - A copy of guidance and technical assistance materials that you have provided to subgrantees
 - Copies of your completed SA applications for Subpart 1 funds, including budgets
 - Copies of your completed LEA applications for Subpart 2 funds, including budgets
 - Information about IWPs, as appropriate, including IWP plans and the rating or review of the plan, if applicable
 - Materials from monitoring activities, guides, or practices (e.g., copies of recent monitoring activities, schedule of upcoming visits, and followup to any corrective action required)
 - Any program evaluation reports for LEAs and SAs that you anticipate being interviewed (e.g., ones being submitted to the SEA in addition to the CSPR data, if available)
- Assess your State's compliance with each indicator (see Indicator Tip Sheets on pages 21–30 for questions that you can ask yourself to assess the compliance of your program). Several meetings may be required to fully assess compliance.
- Address any areas of noncompliance by rectifying the issue or planning how it will be rectified. If your State is out of compliance in several areas, then you may wish to prioritize necessary changes.

Contact With SASA

In preparation for your review, SASA and your SEA will communicate a number of times.

- In general, SASA will inform Title I Directors about which States are slated for a review the summer before each ED fiscal year begins on October 1.

- Approximately 2 to 6 months before the visit, a SASA monitoring team leader will contact your Title I Director again to begin making more detailed plans.
- Shortly after the SASA monitoring team leader contacts the Title I Director, the Title I, Part D, Federal program manager will contact you to finalize the selection of subgrantees for review and discuss the schedule for the week of the review. This communication is usually followed up by a memorandum that is e-mailed to you, your Title I Director, and the monitoring team leader at SASA.
- After this notification, you will coordinate the logistics of the review with the Title I, Part D, Federal program manager; prepare the requested documents for the review; and send all materials that are required to the SASA monitoring team leader. If the Title I, Part D, Federal program manager is not scheduled to participate in your review, then your assigned Title I, Part D, monitor may also contact you for additional details, as needed.

The following tips describe things that you can do to facilitate the early stages of communication with SASA.

- Assist the Title I, Part D, Federal program manager with the selection of the Subpart 2 LEA subgrantee that it will interview, if appropriate. Criteria for Subpart 2 LEA selection include the following:
 - Coordination with Title I, Part A, selection of LEAs
 - Whether an LEA also receives a McKinney-Vento subgrant
 - The relative size of the Subpart 2 award
 - The number of students served by the subgrant
 - N or D programs or facilities that have experienced problems

Logistics and travel time are also considered when identifying locations to visit if doing an onsite review. Monitors are not often able to travel more than 1 or 2 hours from the SEA office.
- Finish preparing copies of ED-requested materials and deliver them, via express mail, to the Title I, Part D, Federal program manager. Ideally, scan and then burn materials onto a CD. Additionally, you can include links to any materials that are available via the Internet.
- Identify your program’s team at each level (SEA, SA, and LEA, if there is a Subpart 2 program) if you have not done so already. Include people who are knowledgeable about each indicator and can speak to the requirements.
- Coordinate the monitoring schedule between the Title I, Part D, monitor and appropriate SEA and subgrantee representatives.

Typical Schedule* for the Title I, Part D, Portion of the Onsite SASA Monitoring Site Review

- States that receive both Subpart 1 and Subpart 2 funding:
 - **Tuesday:** LEA Subpart 2 interview #1 conducted.
 - **Wednesday:** LEA Subpart 2 interview #2 conducted. SA Subpart 1 interview conducted in the afternoon at the SEA office.
 - **Thursday:** SEA interview conducted.
 - **Friday:** Exit conference is held in the morning, if it was not held on Thursday afternoon.
- States that receive only Subpart 1 funding:
 - **Wednesday:** Subpart 1 interview conducted in the afternoon at the SEA office.
 - **Thursday:** SEA interview conducted.
 - **Friday:** Exit conference is held in the morning, if it was not held on Thursday afternoon.

Scheduling Considerations for Interviews

- The Subpart 1 review involves a group interview with at least one representative from each SA subgrantee in attendance. This takes place at the SEA office.
- If you plan to include a variety of program representatives who can speak to your program’s compliance with Title I, Part D, requirements, then schedule additional time.
- The Subpart 1 and Subpart 2 reviews do not involve site visits to facilities, unless that is logistically the best arrangement for ED, SEA, and the subgrantees.

* Subject to change

- Meet in person or via phone with the team that will be involved in the review to educate them on the process and describe the roles and responsibilities of each person. If you have not yet assessed the compliance of your program, then several meetings may be required to fully assess compliance and make necessary changes to programs and practices.
- Contact the Title I, Part D, Federal program manager at any time to confirm the delivery of the requested materials, ask questions about the process, seek clarification, and so forth. If communicating by e-mail, include your Title I Director and the SASA monitoring team leader in the e-mail. The Title I, Part D, Federal program manager is also likely to include them in any communications.
- Continue to assess your compliance with each indicator. (See Indicator Tip Sheets on pages 21–30 for questions that you can ask yourself to assess the compliance of your program.)
- Continue to address areas of noncompliance by rectifying the issue or planning how it will be rectified.

During the Review

After following the previous tips, you should have a good idea of what to expect, who will be doing what, and roughly the degree to which your program complies with each monitoring indicator. The next section includes tips on how best to manage the logistics of the onsite review, facilitate the Federal monitor's review of documents, and participate in interviews.

Logistics

- Confirm whether the Title I, Part D, monitor has appropriate logistical information. For offsite reviews, the monitor should know with whom, when, and how to connect with the State, SA subgrantees, and selected LEA subgrantees for each interview being held via video conference. For onsite reviews, the monitor should know where he/she is going, have appropriate directions, and know with whom and at what time he/she will be meeting. Providing a sheet with details can facilitate this process.
- Make sure appropriate meeting space and/or video conference equipment are ready and available for the SEA, SA, and LEA interviews.
- Provide the Title I, Part D, monitor with a list of names, phone numbers, and e-mail addresses for essential staff with whom he/she may need to speak while monitoring. SASA prefers to have the names of those attending the subgrantee interviews before the interview.
- For onsite reviews, provide the Title I, Part D, monitor with a list of eateries in the area. The monitor must pay for his/her own meals, even if the SEA offers or provides food. However, SEA staff and subgrantees may join SASA monitors for a meal, if the schedule permits.

Documentation

- Organize documents by indicator. For example, a series of paper or electronic folders per indicator should include ways to easily differentiate between documents.
- In addition to the initial document request, refer to SASA monitoring indicators in Appendix B for lists of documents by indicator that you will have to prepare.
- Include only documents relevant to the respective indicators.
- If you want to share a few additional documents with the Title I, Part D, monitor, then place them in a miscellaneous section behind the other documents or in a separate file.
- Include documents from the current FY. If you have not yet conducted some activities during the current FY (e.g., monitoring, application processes), then include documents from the previous FY.
- Identify appropriate staff to assemble the documents or files (e.g., a budget staff member to prepare the budget-related documentation).
- Provide copies of CSPR data for only subgrantees that will be interviewed. SASA will have a copy of the latest State report.

- Provide copies of other program evaluation reports—that include evaluation of the Title I, Part D, program—submitted to the SEA or conducted by the SA, LEA, or facility.
- DO NOT share individual student records. However, you may show a sample page that summarizes individual data. Be sure to conceal identifying information to maintain student confidentiality.
- DO NOT include case files.

Interviews

- Review the questions included in the SASA monitoring guide (See Appendix B).
- Invite only appropriate staff—such as administrators or supervisors of programs (decisionmakers) or providers of direct service to students—who can answer the questions described in the SASA monitoring guide.
 - Note: Including extra staff as attendees or respondents will make the interview longer; plan the schedule in accordance with the number of staff involved.
 - SEA staff are welcome to attend SASA interviews with subgrantees.
- Prepare yourself and appropriate staff to answer all questions that are outlined in the SASA guide.
- If you create PowerPoint presentations as part of your technical assistance to subgrantees, then provide a copy of all the slides in handout form (e.g., six slides per page, two-sided) or just the first few slides. DO NOT submit copies of every slide in color on a separate page.
- Identify documents to which you will refer to during the interviews. Print outs of all e-mail communications with partners or subgrantees are NOT necessary. However, agendas from meetings attended by the subgrantee may be useful to have at hand.
- Attend the exit conference and take notes.
- Get the monitor’s input on the ways in which you can make improvements, particularly if he/she has identified preliminary issues and has agreed to share tips on how to remedy or address findings.

Exit Conference

At the conclusion of the monitoring review, the SASA monitoring team will meet with your Title I Director and appropriate SEA representatives, per the Director's invitation, to (a) discuss its *preliminary* assessment of the SEA's compliance to Federal requirements, (b) consider how to rectify *preliminarily* issues, and/or (c) describe the next steps of the process. This meeting is designed to close the review and allows monitors to follow up with their respective State coordinator. During this meeting, the SASA monitoring team will not give you a final assessment as to whether and in which areas you are and are not compliant. For offsite reviews, your monitor will participate via phone or video conference; you can also participate remotely from your SEA office.

Post-Review

Report and Findings

When the interviews have been completed (whether offsite or onsite), the SASA monitoring team will finalize a monitoring report. If SASA identifies any Title I, Part D, findings, then you will be expected to rectify them. Before the monitoring report is finalized, a draft version will be sent to your Title I Director and Chief State School Officer. Your Title I Director will have 5 business days to review the draft and point out inaccuracies. Once the final version of the report is received, your Title I Director has 30 business days to respond to any findings and required actions. During this time, you will have to project a timeline to complete the required action(s). Related tips are below.

- Expect to receive your monitoring report from SASA about 40 days after the review is completed.
- If you don't receive your report after 2 months, then follow up with your Title I Director.

- DO NOT contact the Federal program manager or Title I, Part D, monitor about the review before receiving your report unless he/she contacts you with followup questions.
- Use information from your exit conference and monitoring report in your response to any findings and required actions.

Additional Activities

Although the review is officially over, the work that you did for the review can be helpful in ensuring all of the required program elements are implemented. You can do a number of things to conclude the review process and prepare for the next one, including sharing and using the knowledge you obtained from the process.

- Debrief with your team of staff and subgrantees. What worked well? What didn't? How can this experience inform your subgrantee monitoring processes?
- Revisit findings and monitoring indicators on a regular basis to minimize preparation for the next review and to ensure that your program maintains compliance over time.
- Document the process that you used for the review and archive related materials in an easily accessible location to facilitate preparations for the next review.

INDICATOR BY INDICATOR: TIPS FOR EXAMINING YOUR N OR D PROGRAM

To prepare for the content of the Title I, Part D, Federal monitoring review, the following section provides comprehensive tip sheets for each of the current Title I, Part D, monitoring indicators. Each tip sheet provides basic steps that you can take in preparation for your review, including detailed lists with:

- Background information that you can review to better understand the requirements (e.g., links to relevant sections of the statute, Nonregulatory Guidance, and so forth)
- Questions that your team can answer to assess program compliance
- Steps that you can take to address areas in which you are not compliant, including helpful tools to which you may refer to gain compliance

Because of the comprehensive nature of the tip sheets, your team of State and subgrantee staff may need several meetings to work through all of them (see pages 14–16 for general, related tips). For example, after an initial meeting to describe your upcoming monitoring review, you could arrange a couple of meetings for each indicator with appropriate staff (data and monitoring staff for current Indicator 1.1, budget staff for current Indicators 3.1 and 3.2). During those meetings, designated teams can work through their respective indicator tip sheet and then gather needed documents and prepare for SASA interviews.

INDICATOR 1.1 (STANDARDS, ASSESSMENT, AND ACCOUNTABILITY)

- **Review background information on Indicator 1.1**
 - SASA's criteria for Indicator 1.1 in Appendix B
 - Relevant sections of statute: Sec. [1426](#); [1431](#)
 - Relevant sections in ED's *Nonregulatory Guidance*: [F-1](#), [G-1](#), [Q-1](#), [R-1 through R-3](#)
 - NDTAC's *State Coordinator's Orientation Handbook*: [pages 16-23](#)

- **Assess compliance with standards, assessment, and accountability requirements**

Monitoring

Tools

- Do you have subgrantee monitoring protocols and checklists for your SA and LEA subgrantees?
- Are your subgrantee monitoring protocols and checklists aligned with the Title I, Part D, law?
- Do your protocols and checklists allow you to determine whether SA and LEA applications are submitted, complete, and being implemented fully?
- Do your protocols and checklists allow you to determine whether students in Part D-funded programs receive instruction that is aligned with State standards?

Process

- Do you have a subgrantee monitoring schedule for all of your subgrantees? Is the schedule being followed?
- Do you notify all of your subgrantees about the monitoring schedule and upcoming reviews?
- Do you share the monitoring protocol and checklists with all subgrantees in advance of the review?
- Do you provide guidance or training to all subgrantees on the monitoring process in advance of their review (e.g., explain the process and provide tips on how to prepare)?
- Do you prepare and send a monitoring report to each subgrantee after its review?
- Do you require corrective action from all subgrantees who are not compliant?
- Do all of your subgrantees have the documents they submitted to you to resolve a compliance finding?
- Do you provide guidance and technical assistance to all of the subgrantees that have to prepare corrective action plans?
- Do you have a process to review and revise subgrantee applications?

Evaluation

Data Collection

- Did all of your subgrantees submit data during the last data collection?
- Have you established consequences for subgrantees that do not collect and submit data?
- In addition to the CSPR, do you require subgrantees to submit additional data for evaluation purposes (e.g., are subgrantees expected to set and account for meeting targets in transition services)?
- Do you require subgrantees to use multiple measures of student progress?
- Do you provide subgrantees with guidance and technical assistance on data collection and the CSPR submission?

Data Use

- Do you require subgrantees to determine the program's impact on students?
- Are students in N or D programs receiving instruction that meets your State standards and measures?
- Do you provide subgrantees with guidance and technical assistance on how to use data to evaluate the effectiveness of the program(s)?
- Do you evaluate your program's effectiveness according to the *five requirements* listed in Section 1431(a)?
- Have you taken action with a subgrantee if one of its programs has not met its targets or increased its outcomes or is otherwise underperforming?
- Have you developed materials that describe Statewide program performance?
- Have you disseminated materials to your agency, subgrantees, collaborative partners, and/or the public that describe Statewide program performance?
- Do your subgrantees have the most recent CSPR report or other program evaluation report?
- Do your subgrantees have evidence of longitudinal tracking and comparison of program performance for 2 or more years?
- Do your subgrantees have their most recent agency- or program-specific evaluation report that concerns or includes Title I, Part D?

Adjust policy and/or practices to meet standards, assessment, and accountability requirements

- If you answered "no" to any of the questions above and changes are possible, then try to make them before the monitoring review.
- If you answered "no" to any of the questions above and more substantive changes are necessary, then start planning how to make the respective changes. Be prepared to discuss initial thoughts and plans with your monitor.

Tools Related to Standards, Assessment, and Accountability Policies and/or Practices

Monitoring

- NDTAC's Webinar: [Subgrantee Monitoring: How do States Monitor Their SAs and LEAs?](#)
- [NDTAC's Topic Library pages](#), which include information and resources on topics related to monitoring and compliance
- Contact NDTAC or your N or D community members for examples of tools and processes that other States are using

Evaluation

- NDTAC's Data Corner: Information on the [CSPR](#), [data and analyses](#), [data systems](#), and [pre-post assessment](#)
- Data, reporting, and counts section of the [Webinar Events page](#) on the NDTAC Web site
- NDTAC's [Assessment Toolkit: Measuring Student Academic Performance](#)
- Report card templates and related presentations and materials from the [NDTAC 2007 National Conference](#)

Consult your [NDTAC State liaison](#) and/or N or D community for ideas, guidance, and support. Check the [NDTAC Web site](#) regularly for additional products related to standards, assessment, and accountability.

INDICATOR 2.1 (INSTRUCTIONAL SUPPORT—STATE AGENCY)

Indicator Applies to Subpart 1 Only

Review background information on Indicator 2.1

- SASA's criteria for Indicator 2.1 in Appendix B
- Relevant sections of the Title I, Part D, statute: Sec. [1412\(a\)](#), [1414\(a\) and \(c\)](#), [1416](#), 9302
- Relevant sections in ED's *Nonregulatory Guidance*: [A-1 through A-6](#), [B-1 through B-6](#), [D-1 through D-4](#), [E-1 through E-3](#), [F-1 through F-2](#), [G-1 through G-11](#), [I-1](#), and [J-1 through J-4](#)
- NDTAC's *State Coordinator's Orientation Handbook*: [pages 7-10](#), [12-14](#)

Assess compliance with instructional support requirements for SA programs

State Plan

- Do you have a copy of your State plan?
- Does your State plan set specific goals and measures?
- Are you systematically tracking your program's performance based on the goals and measures included in your State plan?
- Do the goals and measures of your State plan align with program implementation (e.g., SA and LEA applications, monitoring processes, evaluation)?

Funding

- Do you have a list of subgrant awards to all SAs and facilities served by Subpart 1 for the current fiscal year?
- If applicable, do you have information to explain a significant difference in the number or amounts of subgrant awards?

SA Application

- Are you using applications to allocate funds to SAs?
- Does your SA application include all *19 required elements* listed in Sec. [1412](#) of the statute?
- Do you review a facility's eligibility to receive Title I, Part D, funds?
- Do you provide SAs with guidance and technical assistance on their eligibility to apply for Title I, Part D, funds?
- Do you provide SAs with guidance and technical assistance on developing and revising their SA application?
- Do you review and evaluate submitted SA applications for thoroughness and quality? (See Appendix D for a sample SA application review checklist)
- Do you have copies of SA applications for each agency that your State approved?

Institutionwide Projects (IWPs)

- Do you have a list of all SA-funded facilities that are operating an IWP?
- Do you require that IWP plans include all eight required elements listed in Section [1416](#) of the statute? (See Appendix D for a sample IWP plan checklist.)
- Have you reviewed and approved plans for each IWP?
- Do you provide SAs with guidance and technical assistance on working with facilities to operate IWPs? If so, do you have supporting evidence?
- Are you involved in the evaluation of IWPs after approving the IWP plans submitted as part of each SA application?

For any SAs with facilities operating an IWP....

- Do the SAs have documentation related to the eight required elements (e.g., needs assessment, evidence of professional development, evaluation report)?
- Do you have evidence that a facility has conducted a comprehensive needs assessment to identify the needs of students who are 20 years of age and under and expected to leave incarceration within 2 years?
- Do the SAs ensure that their needs assessment, curriculum, plans for professional development, and program evaluation process are aligned?
- Are the SAs evaluating the projects in consultation with personnel who are providing direct instructional services and support services?

SA Program Implementation

- Are SAs sufficiently assessing the needs of students, including special education students?
- Are SAs providing sufficient Title I, Part D-supported, professional development to teachers?
- Are SAs effectively coordinating the Title I, Part D, program with other education programs?
- Are SAs in regular contact with students' parents and previous school regarding their education?
- Do students earn school credits that are transferable to public schools?
- Do your SAs have a system to transfer records?
- Do your SAs have a way to follow up on students once they leave the institution to determine what happens next?
- Do you provide SAs with guidance on allowable uses of Subpart 1 funds?

□ Adjust policies and/or practices to meet instructional support requirements for SA programs

- If you answered “no” to any of the questions above and changes are possible, then try to make them before the monitoring review.
- If you answered “no” to any of the questions above and more substantive changes are necessary, then start planning how to make the respective changes. Be prepared to discuss your initial thoughts and plans with your monitor.

Tools Related to SA Instructional Support Policies and/or Practices

- NDTAC's guide [Planning and Implementing Institutionwide Projects](#)
- [NDTAC's Topic Library pages](#), which include information and resources on topics related to family involvement, transition, learning and behavior management, and teacher quality and professional development.

Consult your [NDTAC State liaison](#) and/or N or D community for other examples, ideas, guidance, and support. Check the NDTAC Web site regularly for additional products related to SA instructional support.

INDICATOR 2.2 (INSTRUCTIONAL SUPPORT—LOCAL EDUCATION AGENCY)

Indicator Applies to Subpart 2 Only

Review background information on Indicator 2.2

- SASA's criteria for Indicator 2.2 in Appendix B
- Relevant sections of statute: Sec. [1423](#), [1425](#)
- Relevant sections in ED's *Nonregulatory Guidance*: [L-1 through L-4](#), [M-1 through M-6](#), [N-1 through N-3](#), and [P-1 through P-2](#)
- NDTAC's *State Coordinator's Orientation Handbook*: [pages 11-14](#)

Assess compliance with instructional support requirements for LEA programs

Funding

- Do you have a list of subgrant awards to all LEAs and facilities and programs served by Subpart 2 for the current fiscal year?
- If applicable, do you have information to explain the significant difference in the number or amounts of subgrant awards?

LEA Application

- Are you using applications to allocate funds to LEAs?
- Does your LEA application include all *13 required elements* listed in Section 1423 of the statute?
- Do you notify all eligible LEAs regarding the opportunity for Title I, Part D, funds?
- Do you provide LEAs with guidance and technical assistance to help them determine whether they are eligible to apply for Title I, Part D, funds?
- Do you provide LEAs with guidance and technical assistance on developing and revising their LEA application?
- Do you review and evaluate submitted LEA applications for thoroughness and quality? (See Appendix E for a sample LEA application review checklist)
- During the LEA application review, do you use criteria to select programs with "high numbers or percentages" of eligible students?
- During the LEA application review, do you use criteria to select only programs that address the purposes of the Title I, Part D, program?
- Do you have copies of LEA applications for each LEA the State approved?
- Do you require that LEAs enter formal agreements with locally operated correctional facilities?
- Do you have copies of formal agreements between each funded LEA and locally operated correctional facility?

LEA Program Implementation

- Do you provide funded LEAs with information or guidance on operating Title I, Part D, programs?
- Do the LEAs ensure that their funded program(s) assist(s) students in meeting high academic achievement standards?
- Do the LEAs ensure that correctional facilities with more than 70 percent of students residing within the boundaries served by the LEA have appropriate transitional services?
- Do correctional facilities funded by LEAs identify, assess, and address needs of special education students?

- Do LEAs ensure that their programs coordinate with other services (e.g., health) and Federal programs (e.g., vocational and technical programs)?
- Do LEAs ensure qualified instructional staff? For LEAs that provide educational services, staff must be highly qualified according to the Elementary and Secondary Education Act, as amended in 2001 (also known as the No Child Left Behind Act or NCLB).
- Do you make sure that the LEA education program is comparable to the education in schools that children would otherwise attend?

□ Adjust policies and/or practices to meet instructional support requirements for LEA programs

- If you answered “no” to any of the questions above and revisions are possible, then try to make them before the monitoring review.
- If you answered “no” to any of the questions above and more substantive changes are necessary, then start planning how to make the respective changes. Be prepared to discuss your initial thoughts and plans with your monitor.

Tools Related to LEA Instructional Support Policies and/or Practices

- [NDTAC's Topic Library pages](#), which include information and resources on topics related to family involvement, transition, learning and behavior management, and teacher quality and professional development.

Consult your [NDTAC State liaison](#) and/or N or D community for other examples, ideas, guidance, and support. Check the NDTAC Web site regularly for additional products related to LEA instructional support.

INDICATOR 3.1 (FIDUCIARY—STATE AGENCY)

Indicator Applies to Subpart 1 Only

Review background information on Indicator 3.1

- SASA's criteria for Indicator 3.1 in Appendix B
- Relevant sections of statute: Sec. [1004](#); [1414\(c\)\(7\)](#); [1415\(b\)](#); [1418](#)
- Relevant sections in ED's *Nonregulatory Guidance*: [C-1 through C-2](#), [F-1](#), [K-1 through K-5](#)
- Relevant sections of *Nonregulatory Guidance on Title I Fiscal Issues*: Maintenance of Effort (page 15), Supplement/Not Supplant (page 37), Carry Over (page 42)
- Relevant sections of EDGAR: [Part 80, Subpart C](#) (Post-Award Requirements)
- Relevant OMB Circulars: [Circular A-87](#) (Cost Principles) and [Circular A-133](#) (Audits)

Assess compliance with fiduciary requirements for SA programs

General

- Did your SAs receive subgrants within 3 months of submitting their application?
- Do you review general fiscal reports from your subgrantees (e.g., monitor periodic financial reports, lists of staff, how funds are carried over if appropriate)?
- Do you oversee other SA financial activities (e.g., budget amendment requests and approvals)?

Administrative Expenses

- Are you reserving and using an appropriate amount of your funds for administrative expenses during the current year (see [Section H-3](#) in the *Nonregulatory Guidance* and [Section 1004](#) of ESEA as amended in 2001)? Do you have evidence of that?
- Did you reserve and use an appropriate amount of funds for administrative expenses during the previous fiscal year? Do you have evidence of that?

Transition Reservation

- Do you provide SAs with written guidance and technical assistance on the transition reservation requirement?
- Do you calculate or review whether subgrantees have reserved the proper amount for transition (15–30 percent of their grant award)?
- Can your SAs describe the transition-related activities funded by the transition reservation and any organizations with which they may contract to provide these services?

Maintenance of Effort

- Have you calculated or checked fiscal maintenance of effort for each SA?
- Did you take action with an SA if the fiscal maintenance of effort was under 90 percent?

Use of Funds

- Are your subgrantees and facilities implementing activities as approved and budgeted in their SA application?
- Do you check whether SAs are using funds to supplement (and not supplant) the regular program of instruction?
- If an SA has used funds to supplant the regular program of instruction, have you taken action?

- **Adjust policies and/or practices to meet fiduciary requirements for State agency programs**
 - If you answered “no” to any of the questions above and changes are possible, then try to make them before the monitoring review.
 - If you answered “no” to any of the questions above and more substantive changes are necessary, then start planning how to make the respective changes. Be prepared to discuss your initial thoughts and plans with your monitor.

Tools to Adjust LEA Fiduciary Policies and/or Practices

- Refer to *Background Information* on the previous page.
- Consider subscribing to the [No Child Left Behind Financial Insider](#) and/or [Title I Monitor](#), publications that provide guidance on NCLB fiscal issues.

Consult your [NDTAC State liaison](#) and/or N or D community for other examples, ideas, guidance, and support. Check the NDTAC Web site regularly for additional products related to fiduciary policies and practices.

INDICATOR 3.2 (FIDUCIARY—LOCAL EDUCATION AGENCY)

Indicator Applies to Subpart 2 Only

Review background information on Indicator 3.2

- SASA's criteria for Indicator 3.2 in Appendix B
- Relevant sections of statute: Sections [1004](#) and [1424](#)
- Relevant sections in ED's *Nonregulatory Guidance*: [F-1](#), [O-1 through O-7](#), [Q-1](#)
- Relevant sections of EDGAR: [Part 80, Subpart C](#) (Post-Award Requirements)
- Relevant OMB Circulars: [Circular A-87](#) (Cost Principles) and [Circular A-133](#) (Audits)

Assess compliance with fiduciary requirements for LEA programs

General

- Did your LEAs receive subgrants within 3 months of submitting their application?
- Do you review general fiscal reports from your subgrantees (e.g., monitor periodic financial reports, lists of staff, how funds are carried over if appropriate)?
- Do you oversee other LEA financial activities (e.g., budget amendment requests and approvals)?

Administrative Expenses

- Are you reserving and using an appropriate amount of funds for administrative expenses during the current year (see [Section 1004](#) of ESEA as amended in 2001)? Do you have evidence of that?
- Did you reserve and use an appropriate amount of funds for administrative expenses during the previous fiscal year? Do you have evidence of that?

Use of Funds

- Do you provide LEAs with guidance on allowable uses of Subpart 2 funds?
- Do you review whether LEAs and their programs are using funds appropriately, according to Section [1424](#) of the statute and Section [O](#) of the *Nonregulatory Guidance*.
- Are the LEAs and locally operated correctional facilities implementing activities as approved and budgeted in their LEA application?
- Are the LEAs and locally operated correctional facilities providing services and using funds as described in their formal agreement?
- Can the LEAs provide documentation that shows how much of the subgrant was used in the previous year and for what expenditures and activities?
- Can the LEAs list all personnel who are paid with Title I, Part D, funds and the proportion of their salaries, benefits, and duties that are funded by Title I, Part D?

Adjust policies and practices to meet fiduciary requirements for LEA programs

- If you answered "no" to any of the questions above and changes are possible, then try to make them before the monitoring review.
- If you answered "no" to any of the questions above and more substantive changes are necessary, then start planning how to make the respective changes. Be prepared to discuss your initial thoughts and plans with your monitor.

Tools to Adjust LEA Fiduciary Policies and/or Practices

- Refer to *Background Information* on the previous page.
- Consider subscribing to the [No Child Left Behind Financial Insider](#) and/or [Title I Monitor](#), which are publications that provide guidance on NCLB fiscal issues.

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