

## Q & A from the *Understanding Title I, Part D Data* Webinar

November 13, 2008

### Background

This document provides a summary of the question and answer sessions that took place during the November 13<sup>th</sup> Webinar, and focus on the reporting requirements for the Annual Count and the CSPR. The questions and responses have been expanded to provide context for those who were not able to attend the presentation and to provide further details and information for those who participated. Several important clarifications to the information provided during the Webinar are included below.

### Questions related to the Annual Count Process for Generating Funding

**Q: If the [Subpart 2] count must include students who live in institutions for at least one day, what about community day programs?**

- A. In most instances, students in community day programs cannot be counted to generate Subpart 2 funding since they are typically non-residential programs, and the counting requirements for Subpart 2 require that the students live in the facility.

**IMPORTANT CLARIFICATION:**

For Subpart 1, however, students enrolled in community day programs can be counted as long as the average length of stay (e.g. enrollment) for the community day program is at least 30 days and the other eligibility criteria are met; students need not reside in the community day program to be counted.

It is important to note the distinctions between counting and funding in relation to community day programs. Despite the differences in counting students in community day programs for the purpose of generating funds, community day programs with any length of stay can be served by Subparts 1 and 2 funds. (See D-2 and O-6 of Nonregulatory Guidance at [http://www.neglected-delinquent.org/nd/resources/guidance/state.asp#sa\\_eligibleinst](http://www.neglected-delinquent.org/nd/resources/guidance/state.asp#sa_eligibleinst)).

**Q: Any advice on what to do with an LEA that does not want to submit a count for a qualifying institution because they don't want to be responsible for the facility? Past guidance was that the SEA must find another LEA for the facility.**

- A. It is important to make a distinction between counting and serving. While LEA's are not required to provide a count, it should be communicated to them the importance of the count in order to generate funds that serve students who are neglected, delinquent or at risk. LEAs that submit a count do not necessarily have to serve the facility that was counted, depending on how the SEA awards funds and the information included in the LEA application (See sections M and N of the Nonregulatory Guidance: [http://www.neglected-delinquent.org/nd/resources/guidance/local.asp#lea\\_subgrants](http://www.neglected-delinquent.org/nd/resources/guidance/local.asp#lea_subgrants)). In fact, depending on how SEAs award funds, the following are potential possibilities:

- 1) The LEA may determine that the students in the facility are not of greatest need;
- 2) The LEA itself could support an LEA-run program;
- 3) The SEA can see if another LEA would apply for the funds;
- 4) The SEA can directly provide educational services to the youth at the facility.

**Q. What about students that have a diploma? If we have a 17-year-old with a high school diploma, but they're still attending education in our youth correctional facilities to get further education, can they be counted?**

A. It depends on the Subpart to which you are referring.

State Agency/Subpart 1:

If this is a student in a facility run by a State Agency (Subpart 1), then the student cannot be counted. According to USED's [Guidance for Identifying Eligible Institutions and Counting Children](#), students who have already earned a HS diploma cannot be counted in the annual count for Subpart 1 because, having already passed grade 12, they would no longer be enrolled in what is defined as a "regular program of instruction." Below is the excerpt from the Guidance that details youth eligibility for being included in the S1 count.

**Excerpt from USED Guidance for State Agencies in Identifying Eligible Institutions and Counting Children**

State-Operated or Supported Institutions

To be eligible to be counted as enrolled, a child must be:

- (1) Under 21 years of age
- (2) One for whom a State agency is providing a free public education; and
- (3) Enrolled in a **regular program of instruction** supported by non-Federal funds for at least:
  - 20 hours per week if in an institution for neglected or delinquent children or a community day program for neglected or delinquent children; or
  - 15 hours per week if in an adult correctional institution.

A "regular program of instruction" means an educational program (**not beyond grade 12**) in an institution or a community day program for neglected or delinquent children that consists of classroom instruction in basic school subjects such as reading, mathematics, and vocationally oriented subjects, and that is supported by non-Federal funds. Neither the manufacture of goods within the institution nor activities related to institutional maintenance are considered classroom instruction.

Local Education Agencies/Subpart 2:

If the student is aged 5-17 years old, and meets the eligibility criteria outlined in the USED instructions, they may be counted under the Subpart 2 section. The "regular program of instruction" requirements do not apply in this section in order for students to be counted to generate funding.

*NOTE: Be sure not to confuse eligibility to be counted and eligibility to receive funding and services. There are key differences between these two types of eligibility requirements and just because a student can be counted to generate funds, does not necessarily mean they meet the requirements to be served under Title I, Part D.*

**Q. Do you count only students that you serve in the current year? What about institutions that you plan to serve in the next year?**

- A. For counting purposes (to generate funds for SY 2009-10), you should count all eligible students in all eligible institutions or programs. For State Agencies, you should count students in the one-day window (from the 2008 calendar year), and for LEAs you would count students during the consecutive 30-day count window, which includes one day in October 2008.

*NOTE: Facilities and the students within those facilities are determined to be eligible based on criteria outlined for SAs and LEAs; having received Part D funding during the 2008 calendar year is not part of the eligibility requirement as long as the other criteria are met.*

## **Questions related to reporting in the Consolidated State Performance Report (CSPR)**

**Q. In terms of indicators in the CSPR, we have many students who are not in high school. Is there any insight as to looking into more than just high school credits and graduation rates? I think that would really show more progress.**

- A. There are several measures currently in the CSPR that include students of all age groups: the academic performance indicators for reading and math improvement include students in all grades/age groups (though the students are required to be long-term), and the number of students returning to local schools is also an indicator for students of any age.

In addition, when the State coordinators meet together at the next Title I, Part D conference, which will be in June 2009 here in Washington DC, John McLaughlin would like to have an open discussion regarding people's suggestions or thoughts on what are the best indicators to measure the results and the performance of the program. Individuals in local programs are also invited to give their comments to their State coordinators so they can bring them to the meeting.

**Q. We have a question related to the spreadsheet that NDTAC provided us for the data collection, which we can send off to facilities and they are able to send it back to us and we can roll up the data into a final report.**

- A. If any States or facilities are currently using the NDTAC excel data collection tools for the CSPR and are encountering any difficulties, please contact your [NDTAC State Liaison](#) so that NDTAC may assist you with any problems. Once the data are rolled up to the State level, you will still need to submit the data through the online system.

**Q. We have one juvenile detention center that is not under the State Agency. Since this program is under Subpart 2, we have to collect data to the student level. This raises confidentiality concerns at the facility. How should we handle the CSPR reporting requirements for this one specific juvenile detention center falling under Subpart 2?**

- A. For the purposes of reporting in the CSPR, States will not be reporting the data to ED at the student level, it should be aggregated by each LEA, which will then be rolled up across all LEAs by the SEA. When the data is entered into the CSPR there will be no individual records or information from which students could be identified. If there are additional confidentiality concerns within the State, please contact your [NDTAC State Liaison](#) so we may assist you further.

**Q: Are LEA's required to report on average length of stay?**

- A. Yes. Both LEAs and SAs should be reporting on the average length of stay for each program area. Average length of stay is requested on both sections of the form (in tables 2.4.1.1 and 2.4.2.1.). Instructions on how to calculate a weighted average are included in Appendix E of the [CSPR Instructional Guide](#).

**Q: How is long-term defined?**

- A. Long-term is defined as students who are enrolled in the program for 90 or more consecutive calendar days during the reporting period.

**Q: When the race and ethnicity categories move to seven categories, what are they going to be?**

- A: There will be a two-step data collection process required. First, you will need to establish whether the student is Hispanic or non-Hispanic (ethnicity). Then, you will have to establish whether a student identifies with one or more of the revised racial categories regardless of ethnicity, meaning that a category will be provided one that allows students to indicate two or more races.

For a complete list of the reporting categories, and more information about what is required, refer to the resources listed below on the ED Web site. Additionally, check with your *EdFacts* coordinator to see when your State has planned to switch over to these new categories. You will not see the breakouts of race/ethnicity across the seven categories in the electronic system until ED is ready to move the whole system over.

**Resources:**

- *EdFacts* lists several resources related to the changes to the race/ethnicity categories: <http://www.ed.gov/about/inits/ed/edfacts/index.html>
- Policy related Q & A from USED: <http://www.ed.gov/policy/rschstat/guid/raceethnicity/questions.html>

**Q: When will the changes for race/ethnicity be required?**

- A: No later than school year 2010-11. Check with your *EdFacts* coordinator to determine the timeline for changes in your State.

**Q: In Table 2.4.2.3 (Program/Facility Academic Offerings) where it states facility, is it asking about specific residential facilities or is it asking about specific programs (non-residential) within the LEA?**

- A. In all of the 2.4.2 (Local Agency, Subpart 2) sections of the CSPR, all facilities/programs and students that received or benefitted from Subpart 2 funding during the SY 2007-08 should be reported. This includes any non-residential programs that received Title I, Part D, Subpart 2 funding.

The program and facility categories provided for LEAs in the Subpart 2 section are:

- At-risk programs
- Neglect programs
- Juvenile detention
- Juvenile corrections
- Other programs

Definitions for programs categories are provided at the beginning of the 2.4 Section within the CSPR forms, and are also included in NDTAC's [CSPR Instructional Guide](#). If you have additional questions about how to categorize a program or facility that received Subpart 2 funding, please contact your [State Liaison](#).

*NOTE: There are exceptions to the reporting of students who attend a regular local school, such as students who are in at-risk programs, and are already captured in the academic reporting within the school system either at the school or LEA level. Please refer to the [CSPR FAQs](#) on the NDTAC Website for more information.*