

Title I, Part D, Compliance Monitoring

A Constant Connection

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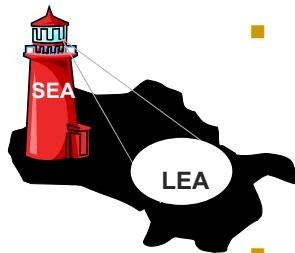
Constant Connection

- It is essential that the SEA consistently monitor Title I, Part D, funded programs for compliance with the Title I, Part D, Law.
- Communication is a key aspect of successful monitoring and should be prevalent throughout the process.

Florida's Process

- To ensure communication is present throughout the monitoring process.
 - *Workpapers* that outline individual compliance items; questions about compliance; and documents to be submitted for compliance are submitted to the subgrantees well in advance of all monitoring reviews.
 - Compliance issues are discussed during bi-monthly conference calls before, during, and after the monitoring review.
 - Compliance issues from the previous year are addressed in the design of the application for the following year.

Florida's Methods of Monitoring



- **Florida implements three methods of monitoring.**
 - Onsite Monitoring
 - Desktop Monitoring
 - Self Certification Evaluation
- **Onsite monitoring gives SEAs the best view of the day-to-day operations of an N or D program and allows them to easily recognize compliance issues.**

Florida's Monitoring Process

- All of Florida's educational agencies, or subgrantees, are placed in a five-year rotation schedule.
- Subgrantees that are in the current year's group are selected for onsite or desktop monitoring. This selection is dependent upon a risk factor analysis.
- In order to maintain constant connection all subgrantees not in the current year's group are required to complete self certification evaluation.

Florida's 5-year Monitoring Schedule

Five Year Monitoring Schedule for 2009-2014

2009-2010	2010-2011	2011-2012	2012-2013	2013-2014
Bay	Escambia	Columbia	Wakulla	UF Lab School
Gadsden	Santa Rosa	Baker	Hillsborough	Dade
Putnam	Nassau	Lake	Pinellas	Pasco
Jefferson	Duval	Orange	Gilchrist	Union
Hamilton	Volusia	Sarasota	Charlotte	Bradford
Manatee	Seminole	Desoto	Liberty	Holmes
Hardee	Martin	St. Johns	Franklin	Calhoun
Highlands	St. Lucie	FSDB	FAU Lab	Citrus
Polk	Palm Beach	FSU Lab	Levy	Hernando
Gulf	Osceola	FAMU Lab	Marion	Monroe
Jackson	Okeechobee	Broward	Clay	Collier
Taylor	Madison	Glades	Indian River	Lee
Brevard	Suwannee	DOC	Flagler	Alachua
Leon	Dozier	Okaloosa		Lafayette
	Dozier II	Walton		Dixie
	Okeechobee Boys School	Hendry		Suinter
	Washington			

Difficulties of Onsite Monitoring

- During onsite monitoring the SEA physically visits the N or D programs which may include:
 - Interviewing the Local Title I, Part D, coordinator
 - Visiting programs served by Title I, Part D

It may be difficult to cover all agencies for many reasons

Too Many Agencies
Florida



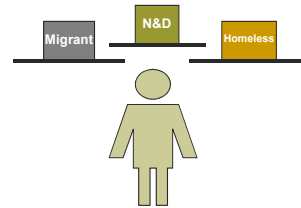
46 LEAs
4 SAs

Too Much Travel
Montana



147,046
Square miles

Too Many Hats
Several States



Desktop Monitoring

- Subgrantees submit documentation to the SEA to prove compliance using Florida's online monitoring system.
- The SEA determines whether or not the documentation is sufficient for compliance.

Florida's Desktop Process

- Subgrantees receive *Workpapers* well in advance of the documentation submission deadline.
- Program director conducts conference calls with subgrantees in order to walk-through documentation requirements
- Subgrantees submit answers to the compliance questions and compliance documentation using Florida's Online Monitoring System.

Florida's Desktop Process

Sample Workpaper

Compliance Item AID2-3: Any Local Educational Agency (LEA) that receives funds under this subpart shall ensure that formal agreements or contracts with correctional facilities comply with all elements in section 1425 of the NCLB Law. *Section 1425(1), P.L.107-110*

Finding(s)

The LEA should:

ensure that formal agreements or contracts with correctional facilities comply with all elements in section 1425 of the NCLB Act.

Review Question(s)

How did the LEA ensure that formal agreements or contracts with correctional facilities comply with all elements in section 1425 of the NCLB Law?

Documents to Support Compliance

Formal Agreements: Evidence that the LEA has formal agreements with correctional facilities that comply with all 11 elements in section 1425 of the NCLB Law including at least one of the following:

- actual formal agreements with all 11 elements highlighted; and/or
- addendums to all formal agreements that ensures compliance with the 11 elements

Florida's Desktop Process

Sample Documentation

COOPERATIVE AGREEMENT
BETWEEN THE SCHOOL BOARD OF HAMILTON
COUNTY, FLORIDA
AND
THE DEPARTMENT OF JUVENILE JUSTICE
ATTACHMENT B
FORMAL AGREEMENTS

In compliance with PL 107-110, Section 1423, we agree to meet all the requirements of PL 107-110, Section 1425, as follows:

(1) where feasible, we will ensure that educational programs in the correctional facility are coordinated with the student's home school, particularly with respect to a student with an individualized education program under part B of the Individuals with Disabilities Education Act;

(2) if the child or youth is identified as in need of special education services while in the correctional facility, we will notify the local school of the child or youth of such need;

(3) where feasible, we will provide transition assistance to help the child or youth stay in school, including coordination of services for the family, counseling, assistance in accessing drug and alcohol abuse prevention programs, tutoring, and family counseling;

Cooperative Agreement Review Report
Section 1425:

(1) where feasible, we will ensure that educational programs in the correctional facility are coordinated with the student's home school, particularly with respect to a student with an individualized education program under part B of the Individuals with Disabilities Education Act;

Compliance:
 Yes No Reviewed by: _____

(2) if the child or youth is identified as in need of special education services while in the correctional facility, we will notify the local school of the child or youth of such need;

Compliance:
 Yes No Reviewed by: _____

(3) where feasible, we will provide transition assistance to help the child or youth stay in school, including coordination of services for the family, counseling, assistance in accessing drug and alcohol abuse prevention programs, tutoring, and family counseling;

Compliance:
 Yes No Reviewed by: _____

Certified Self-Monitoring

- Subgrantees collect documentation to prove compliance.
- Subgrantee head certifies compliance and reports certification to SEA using the Self Certification Evaluation.

*****Responsibility is placed on the subgrantee head.*****

Florida's Self Certification Process

- Subgrantees receive *Workpapers* well in advance of the Self Certification Evaluation submission deadline.
- Program director conducts a conference call with subgrantees in order to walk-through documentation requirements
- Superintendents certify compliance with each item by completing a self certification survey.
- Completed surveys are submitted to the SEA.

Florida's Self Certification Process

- Methods Ensure Self Certification
 - Annual Internal Monitoring
 - Individual Program or LEA level staff conducting mock monitoring visits on all N or D programs within the state
 - Annual compliance monitoring by external parties
 - Peer monitoring

Florida's Self Certification Process

2009-2010 No Child Left Behind and Selected Florida Statutes Monitoring Self-Evaluation Certification

Local Education Agency: _____ LEA Contact: _____
 In the column headed "Contact Information," please provide the name, title, mailing address (including room/office number if applicable), telephone and fax numbers (including area code), and e-mail address of the person responsible for each program.

Program	Compliance Designation			Program Contact Information
	Requirements Met	Further Action Required (System Improvement Plan Required)	Not Applicable*	
Title I, Part A (Basic)				
Title I, Part A (Choice)				
Title I, Part C (Migrant)				
Title I, Part D, Subpart 1 (State Agency N&D)				
Title I, Part D, Subpart 2 (Local Agency N&D)				
Title II, Part A (Teacher & Principal Training)				
Title II, Part D (Enhancing Education Through Technology)				
Title III, Part A (English Language Acquisition)				
Title IV, Part A (Safe & Drug-Free)				
Title VI, Part B (Rural & Low-Income)				
Title X, Part C (Homeless)				

*If not applicable because the LEA does not participate in this program, please indicate this. (Not Applicable is not an option for Title IV, Part A and Title X, Part C, even if the LEA does not receive funding).

I, _____ (Type or Print Name of Superintendent/Designee) do hereby certify that all facts, figures, and representations reported herein are true, correct, and consistent with the requirements set forth in the No Child Left Behind Act and cited sections of the Florida Statutes. Furthermore, all applicable statutes, regulations, procedures, and administrative requirements have been implemented to ensure proper accountability for the expenditures of funds. All records necessary to substantiate these requirements will be available for review by appropriate federal and state personnel.

Signature of Superintendent/Designee _____

Date _____