



Conversations With Long-Term State TIPD Coordinators: Monitoring for Compliance

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About the Series

In this four-part series, several former, long-time Title I, Part D (TIPD) coordinators were asked to share the insights they gained and the strategies they developed when overseeing their State's funding for the education of children and youth who were neglected, delinquent, and at risk. Specifically, TIPD coordinators were asked to reflect on the importance of collaboration, staff development, data collection, and monitoring. The resulting insights and strategies contained in the series are applicable to new and experienced TIPD coordinators alike.

In Part IV of the series, TIPD coordinators were asked to reflect on their monitoring practices. Specifically, they were asked to share their philosophy on monitoring TIPD grantees; explain how they determined whether to conduct desk or on-site reviews; and describe the benefits and drawbacks they believed were inherent in each type of review. Furthermore, TIPD coordinators were asked to share how they prepared themselves and their grantees for monitoring activities and events. Finally, TIPD coordinators were invited to impart any effective approaches that they developed that were informed by their years of monitoring experience.

Monitoring Philosophies

All TIPD coordinators who contributed to this series held the philosophy that monitoring was an effective tool to build grantee capacity. They understood that increasing grantee capacity would ultimately lead to improved outcomes for students served by TIPD programs. Thus, they used preparation for and engagement in monitoring activities as opportunities to provide technical assistance and professional development. The TIPD coordinators, in partnership with other colleagues at the State education agency (SEA), established themselves as resources and allies in ensuring grantee compliance with the letter and spirit of the law.

"Monitoring is extremely important to the success of all educational programs. The State education agency (SEA) must be able to establish each local and State agency's ability to comply with the legislation that appropriates the funding and relevant educational legislation from the State and federal levels. It also ensures that funded programs meet or exceed the performance expectations that are established by State and federal legislation. Monitoring is particularly significant for supplemental educational programs such as Title I, Part D that operate in nontraditional and often difficult settings. I found it extremely important to establish a philosophy that monitoring is not evaluation. It is the best opportunity to provide technical assistance for sustaining effective programming and improving

About the Authors

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- Mr. James Lovett served as the TIPD coordinator in the State of Arizona.
- Ms. Kathleen Sande served as the TIPD coordinator in the State of Washington.

programming that is deficient in compliance and performance. I found that deficiencies were not always caused by issues at the local level. Many times, they were a result of miscommunication from the leadership at the State level. Therefore, I took it personally when deficiencies were avoidable or prolonged."

Melvin Herring, State of Florida

"In our State, we work as a federal monitoring team, going out together to do the Federal monitoring. We call it the Consolidated Program Review team. We are going out to assist districts to use these funds appropriately, track expenses accurately, and operate within the letter of the law, but we are not 'auditors.' We come as monitors, helping them (grantees) to understand what the laws are and why they can and can't use funds in certain ways in order to deter them from getting found non-compliant by the State auditors when they come out."

Kathleen Sande, State of Washington

"As we worked together to improve our TIPD programs in our State, I continued to do presentations at committee meetings and State conferences to promote and increase awareness of students that were in our secure care institutions and worked together with our State department Title I, Part A monitoring director to develop monitoring protocols which accurately reflected the Title I, Part D educational programs for our youth. My focus was teaching our clients (grantees) about program requirements and the importance of maintaining funding by demonstrating program compliance and effectiveness."

James Lovett, State of Arizona

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Determining the Type of Review to Be Conducted

The TIPD coordinators described how they often oversaw many grantees in demographically and geographically diverse communities throughout their respective States. Consequently, *they described the need to employ a system to determine grantees who would receive desk reviews and those who would receive on-site reviews. The TIPD coordinators explained that desk reviews entailed examining documentation of compliance provided by grantees, whereas on-site reviews necessitated a more comprehensive process of examining documentation, observing programs, and interviewing stakeholders. As two of the coordinators shared, risk of noncompliance was a major driver in determining the type of review grantees received. In some cases, as the third coordinator revealed, it was necessary to create a monitoring system where one was not previously in place.*

“Florida’s size and diverse population presented a unique challenge for effective monitoring. There was no way that the TIPD coordinator could conduct annual on-site monitoring for every local and State agency supported by the program. To ensure that I had an understanding of what was going on statewide, I had to implement multiple types of monitoring.

“Early during the first quarter of the grant year, a risk assessment was conducted based on each agency’s ability to ensure compliance and meet performance expectations in the previous year. Multiple factors were considered during this process, with an emphasis on the date of the last on-site monitoring visit, and the previous year’s monitoring findings. Agencies with a moderate risk assessment for either noncompliance or failure to meet performance expectations were designated for desktop monitoring and agencies with a high assessment were designated for on-site monitoring. All other agencies were designated for self-monitoring. Approximately 10 agencies were designated for on-site monitoring each year, which allowed me to visit every agency within a three- to four-year time period. This model ensured that each agency participated in some form of monitoring each year.”

Melvin Herring, State of Florida

“Desk reviews were essentially paper reviews, studying what a grantee gives in proof of a use of funds rather than seeing it in action. Site monitoring allowed the TIPD coordinator to look at records on-site, review practices in the classroom, and to speak with grantees in person. Speaking with grantees in person allowed the TIPD coordinator to ask clarifying questions and to give grantees accolades when they were doing exceptional work. Desk reviews were fine for those sites that were close to the State office and that were doing well because maybe you already visited with them on a regular basis and were aware of their practices, but not for those sites that needed that extra help and hands-on assistance. It was the leads of our Consolidated Program Review team, with our input, who determined which districts would be on-site and which ones would be desk monitored. It was determined by a

specific point system, based on risk for the whole district’s use of Title I dollars over the year. Those least at risk, utilizing the funding appropriately over years, were the ones usually selected for the desk monitoring.”

Kathleen Sande, State of Washington

“Working at the State department, I soon learned that the [Title I of the Elementary and Secondary Education Act](#) program was audited each year by the State auditor general’s office. When I took over the program, the auditors discovered and reported that the Title I, Part D program in our State was not monitoring our subgrantees. That really was helpful for me because I was soon able to develop [Title I, Part D Subpart 1 and 2](#) protocols and also developed a monitoring schedule for the State. For example, in Subpart 1 we had three State agencies (i.e., the Arizona Department of Juvenile Corrections, the Arizona Administrative Office of the Courts, and the Arizona Department of Corrections) so I placed them on a three-year rotating on-site monitoring schedule. The main monitoring was a site visit in the spring to review processes and procedures that were evident within the Title I, Part D. This was all based on the monitoring protocols that had been developed and shared with these same groups. I wanted to deliver a clear and concise message that I was going to be monitoring grantees and this was their opportunity for input into this process.”

James Lovett, State of Arizona

Conducting Desk and On-Site Monitoring Reviews: The Benefits and Drawbacks of Each Approach

As shared previously, employing a variety of different types of reviews helped TIPD coordinators ensure that all grantees were monitored annually. From their reflections, it was evident that there were both benefits as well as drawbacks to each type of review. The benefits of conducting desk reviews for low- to moderate-risk grantees were that they did not require travel, were less labor intensive, and hence took less time to complete. Further, conducting desk reviews for grantees who posed minimal risk allowed TIPD coordinators to allocate more intensive resources to where they were needed most (i.e., to higher risk grantees). Conversely, the drawbacks to desk reviews, as opposed to on-site reviews, were the inability to observe the programs being offered, interview a variety of stakeholders, and further build relationships with grantees. Although on-site reviews were costly in terms of time and resources, TIPD coordinators felt much was gained from conducting in person reviews including increased preparation for federal monitoring visits.

“During the third quarter of the grant year, self-monitored agencies were required to submit a report of their ability to meet each compliance and performance expectation. An attestation of the report was required by the agency’s head

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with the understanding that the SEA could request parts or all of the evidence at any time.

“Desktop monitoring for moderate risk agencies included all aspects of self-monitoring coupled with an actual submission of evidence of compliance and performance. I reviewed the evidence submitted by each agency, and provided feedback where there were initial deficiencies. This feedback was provided during a conference call or webinar with the stakeholders from each agency.

“For high-risk agencies the conference calls and webinars were replaced by actual on-site monitoring visits, that included visits to all individual programs and facilities that were served with Title I, Part D funding. All agencies were required to develop corrective action plans for deficiencies that were identified during the self-monitoring process. These plans were expected to be implemented prior to the awarding of the following year’s Title I, Part D funding.”

Melvin Herring, State of Florida

“That was the benefit of on-site monitoring, seeing and meeting the teachers and staff as well as meeting the students. I often asked to speak with a group of students and asked them how the teaching staff was doing, how the teachers were helping them learn, if they were being engaged in learning more than when they were in their local schools, and of course why they were or were not being more engaged. Being on-site, you were able to go into much more depth with the grantee on why they chose to serve a certain population, why they did or did not engage with parents, or what ideas they had for additional programming.”

Kathleen Sande, State of Washington

“I wanted to get to know our State agency contacts so I also started each school year with a face-to-face meeting usually held at one of their offices. Another benefit on inviting all three State agencies (i.e., the Arizona Department of Juvenile Corrections, the Arizona Administrative Office of the Courts, and the Arizona Department of Corrections) was that they got to know each other and started to utilize each other as resources for information. I followed established State department guidelines and always had an agenda, hand-outs, and sign-in sheets. I always took one of our Title I, Part A compliance directors along with me for input and support and to show that it wasn’t just me making all the Title I, Part D decisions. Relationships were built as we examined public law, monitoring protocols and schedules, and data results and discussed and shared best practices within our State. Having established relationships within this working group was very helpful when we were monitored by the U.S. Department of Education (ED). When it came time to be monitored by ED, the federal monitors wanted to talk to all three State agencies. The State agencies relied on the relationships that they had established with one another and the Arizona Department of Education to guide them through the requirements of Title I, Part D law. As a result, the monitoring proved to be successful

because we were able to provide documentation and evidence of our meetings, agendas, handouts, and outcomes.”

James Lovett, State of Arizona

Preparing for Monitoring Activities and Events

The TIPD coordinators surveyed actively took steps to prepare themselves as well as their grantees for monitoring activities and events. In addition to collaborating with their colleagues within the SEA, developing and/or employing systems to determine types of monitoring to be conducted, TIPD coordinators visited grantees supported by TIPD funds and sought to learn more about the unique environments in which they operated. Additionally, TIPD coordinators organized opportunities throughout the year to prepare their grantees for successful monitoring experiences. When offering these opportunities, TIPD coordinators strived to clearly communicate expectations, solicit grantee input, encourage peer mentorship, provide adequate notice of monitoring schedules, and address grantee questions and concerns.

“I decided that to learn more about our Title I, Part D programs throughout our State, I would plan to visit a few sites each semester. Many of these sites included State-managed correctional facilities and county-run detention centers. Juveniles were being educated in many varied secure care facilities throughout our State within secure care facilities and I worked with these facilities to help develop Title I, Part D programs which reflected best practices within the systems, accurately reflected State statutes, and documented compliance with federal Title I, Part D law.

“Anytime I visited a State or county managed secure care site, I had to have prior approval and submit to a background check. This was especially important when I visited our State correctional facility, which housed juveniles that were adjudicated as adults. I felt it was important to visit these sites to ensure they were teaching State standards and following State and federal laws and guidelines.

“I wanted the monitoring process or monitoring protocols to become familiar, so I took my protocols to site visits, school district meetings, and committee meetings to invite discussion and promote input. The protocols contained what we, the grantees and the Arizona Department of Education, collectively determined to be the essential elements of a Title I, Part D program. Sharing the protocols and being transparent about the process helped build trust and relationships with grantees and presented a great opportunity to guide and promote staff development. Grantees were then able to use the protocols and the indicators contained therein to engage in self-assessment. Engaging in this process helped grantees identify where additional clarification was needed.”

James Lovett, State of Arizona

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“My monitoring approach was designed to review the current implementation of the Title I, Part D program and develop ways to address implementation deficiencies. In order to progress towards accomplishing these goals, multiple compliance and performance expectations were defined and presented to the agencies during the first quarter of the grant year. Throughout the grant year, agencies were expected to gather evidence of their compliance and performance. I provided technical assistance on identifying this evidence during bimonthly webinars, periodic e-mails, conferences, and meetings.”

Melvin Herring, State of Florida

“I assisted my grantees to prepare for monitoring by first making them aware of our cycle of monitoring and [determine] which sites were set for monitoring on an annual basis by sending out a memo. Next, I set up a meeting in the summer with the grantees who were monitored the previous year along with those who were to be monitored in the coming year. This allowed the upcoming sites to learn from those who were just monitored. At this meeting, we discussed each item on the monitoring tool and the example documents they submitted, discussing which ones were accepted and which ones they had trouble with. I announced who would be monitored at our first quarterly grantee meeting in October, discussed our monitoring tool, reviewed the questions that would be asked, and went over the acceptable documentation that would be required. Then I sent an e-mail to each grantee who was set for a monitoring visit with the dates and times that the Consolidated Program Review team would be out along with a request that they contact their staff and set aside time for my visit, usually two to three hours per site. I invited them to ask questions as they prepared their responses.”

Kathleen Sande, State of Washington

Effective Approaches Informed by Experience

When asked about the effective approaches that were developed based on their years of monitoring experience, TIPD coordinators spoke of the power of automation to streamline monitoring processes. Their responses illustrated how automation allowed TIPD coordinators and SEAs to more accurately capture the monitoring activities occurring within their States, create a central repository for compliance related documentation, and integrate monitoring activities within the larger grants management system. Further, these online systems reduced the amount of hard copy paperwork TIPD coordinators were expected to collect and maintain.

“While I served as TIPD coordinator, we at the SEA were in the process of improving our Elementary and Secondary Education Act collection of monitoring activities by having sites submit documentation through our new and improved State monitoring tracker system. Using a document tracking system, aligned to specific indicators from our monitoring protocols, soon became a very practical way for sites to

demonstrate that their Title I, Part D programs were in compliance with monitoring indicators. For example, we could now have facilities upload formal agreements with their subgrantees and we could track this electronically at the State level. Our State department was also in the process of improving our grants management system by going electronic with all State and federal grants. I worked hard with my colleagues to ensure that our Title I, Part D grants followed the requirements of federal law and embedded specific questions within the narrative section for our grantees to respond to and required assurances each year through grants management.”

James Lovett, State of Arizona

“After years of monitoring, I figured out that I do not have to keep grantees’ documents but rather only take copies of those items that are exceptional examples for others to learn from or any great ideas on how they are using funds to showcase at meetings.”

Kathleen Sande, State of Washington

Conclusion

The consensus among the TIPD coordinators who contributed to this series was that monitoring is an effective tool to build grantee capacity. To provide annual oversight to each grantee, the TIPD coordinators, with the support of their SEA colleagues, developed and/or employed a system to determine which grantees would engage in self-monitoring, which would receive desk reviews, and which would receive on-site reviews. Throughout the year, TIPD coordinators prepared themselves and their grantees for successful monitoring experiences by clearly setting and conveying expectations and building grantee competence. The TIPD coordinators understood the connection between positive State and federal monitoring outcomes. Finally, during the course of their careers, the TIPD coordinators recognized the potential of automation to streamline their monitoring processes and integrate these processes with other State and federal grant management activities.

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About the Contributors

Mr. Melvin Herring is the assistant bureau chief of programs for the Florida Department of Corrections. His primary responsibilities include managing academic, special education, teacher certification, restrictive housing, youthful offender, and library service programs for adult correctional facilities throughout the State. Mr. Herring has more than 15 years of experience managing and implementing educational programs for students in unique populations, including more than 10 years of service as Florida's State TIPD coordinator.

Mr. James Lovett has spent more than 35 years in public education working with at-risk students, schools, and districts. He retired in January 2017 from the Arizona Department of Education (ADE) after six years of service as the State TIPD coordinator. He also retired in May 2017 from the AdvancED accreditation organization after six years of being a lead evaluator and chairing accreditation visits from preschool through high school. Mr. Lovett has been a successful presenter on behalf of at-risk youth at both State and national conferences and, upon his retirement from ADE, was recognized with a State of Arizona Commendation for service from the Governor.

Ms. Kathleen Sande has been an advocate for incarcerated adults and juveniles for the past 20 years. She recently transformed her business, RK Consultants, Inc., from teaching corrections workers supervisory and management skills to consulting nationwide with educators and others regarding juvenile justice education rules and regulations, content, funding, and best practices working with facilities. Ms. Sande previously served as the statewide juvenile justice education and Title I neglected-delinquent program manager at the Washington State Office of Superintendent of Public Instruction from 2003 to 2017. She worked with NDTAC from its inception in 2006, participating in a variety of webinars as a panelist and as a keynote speaker in 2016.

Dr. Katie Penkoff, who served as the editor for this series, is a senior technical assistant consultant at the American Institutes for Research. She currently supports and/or directs several Department of Justice-supported training and technical assistance centers. Dr. Penkoff has more than 20 years of experience working in education, social service, government, and nonprofit sectors. Common threads throughout her experiences are working with youth who are system involved (i.e., juvenile justice, child welfare, special education, mental health) with a strong emphasis on serving girls and young women, facilitating resource coordination, and engaging in interagency collaboration.