

Preparing for 2008-2009 NCLB Consolidated Formula Subgrant Oversight & Monitoring

Training for LEAs
New Jersey Forensics, Science & Technology Center
November 25, 2008

Main Purpose

To fulfill The New Jersey Department of Education's (NJDOE) statutory and regulatory obligations of the No Child Left Behind (NCLB) Act of 2001.

- ❖ Section 9304 (a) of NCLB requires that the SEA must ensure that:
 - (1) programs authorized under NCLB are administered in accordance with all applicable statutes, regulations, program plans, and applications; and
 - (2) the State will use fiscal control and funds accounting procedures that will ensure the proper disbursement of and accounting for Federal funds.

NJDOE's Goal

The goal is to assist with the timely payments to LEAs and provide technical assistance during the current grant period to redirect and guide LEAs with respect to the alignment of academic, programmatic, and fiscal needs to meet the federal requirements.

To do so, the NCLB Oversight & Monitoring process had to be redesigned.

NCLB CONSOLIDATED FORMULA SUBGRANT OVERSIGHT & MONITORING PRIOR TO 2008-2009

- NCLB Consolidated Formula Subgrant Application Reviews – Tiers I and II
- Group 2 Districts under the QAAR process

NCLB CONSOLIDATED FORMULA SUBGRANT OVERSIGHT & MONITORING FOR 2008-2009

Title I, Part A: Improving Basic Programs Operated by LEAs	Title III, Part A: Grants & Subgrants for English Language Acquisition and Language Enhancement
Title I, Part A: School Improvement	Title III, Part A: Immigrant
Title I, Part D: Prevention and Intervention Programs for Children & Youth who are Neglected, Delinquent, or At-Risk	Title IV, Part A: Safe & Drug-Free Schools & Communities Act
Title II, Part A: Teacher & Principal Training & Recruiting Fund	Title V, Part A: Innovative Programs
Title II, Part D: Enhancing Education Through Technology	Title VI, Part B: Rural & Low-Income School Program

The Task At-Hand

To accomplish the revamping of the NCLB Oversight & Monitoring Process, the committee basically broke down the task into 4 main areas with working groups for each.

- ❖ Definitions
- ❖ Authorities & Risk Level Assessment
- ❖ Tools & Processes
- ❖ Training

Potential Ramifications of Oversight & Monitoring Noncompliance for NJDOE

- ❖ A condition may be placed on that program's USDE grant award until the issue(s) is/are satisfactorily resolved.
- ❖ Recovery of NJDOE funds associated with the Titles included in the NCLB Consolidated Formula Subgrant.

Recent & Upcoming USDOE NCLB Oversight & Monitoring

Title & Part	Type & Date
Title I, Part A	On-site visit (January 2007)
Title I, Part D	On-site visit (January 2007)
Title II, Part A	Scheduled for 2009-2010
Title II, Part D	Virtual visit (June 2008)
Title III, Part A	On-site visit (December 2007)
Title IV, Part A	TBD
Title V, Part A	Virtual visit (June 2008)
Title VI, Part B	Virtual visit (June 2008)

Types of NCLB Consolidated Formula Subgrant Oversight & Monitoring

- *Application Review*
 - Review and approval of NCLB application
- *Desk Monitoring*
 - Review of programmatic and/or fiscal requirements, conducted in a location other than on-site
- *Telephone Interview*
 - Review and verification of a portion of the NCLB application
- *On-site Monitoring*
 - On-site in-depth review of documentation and materials that provide specific information on programmatic and fiscal programs, services and activities as documented in NCLB application
- *Targeted Review*
 - On-site review focused on specific programmatic and fiscal requirements (e.g., nonpublic school services and/or consultation, SES, professional development, HQT, carryover funds, waivers)
- *Fiscal Audit*
 - Annual on-site review and verification of prior grant period expenditures for Title I, Part A Carryover and School Improvement allocations in accordance with the approved NCLB application and applicable state and federal requirements included in but not limited to EDGAR, and OMB Circulars A-87 Attachment B and A-133 Compliance Supplement.

District Selection

Risk Assessment Model

1. 2007-2008 NJQSAC Districts Master List
2. Applied Risk Level Assessment using the following factors:
 - Timeliness of Original Application & Grant Acceptance Certificate (GAC)
 - Total NCLB Formula Allocation
 - Last NCLB Monitoring Visit
 - Specific NJQSAC indicators relevant to NCLB
3. Results dictate the type of monitoring to occur

The Pilot & Lessons Learned

The feedback and observations included the following bulleted items:

- The time of year needs to be changed to be more conducive for preparation and classroom observations.
- The confirmation letter needs to explicitly stipulate the Titles to be covered during the visit.
- An agenda should accompany the confirmation letter.
- A list of both the NJDOE personnel, district personnel, and the non-public personnel involved in the process should be developed and exchanged prior to the onsite visit.

The Pilot & Lessons Learned (Cont.)

- A single point of contact at the NJDOE was helpful to answer any questions and address any concerns.
- Organization with respect to both documents and personnel was key. More guidance such “Helpful Hints” or “Survival Tips” are necessary to assist districts with preparation for the visit.
- Key personnel necessary for the process must be articulated prior to the visit so that they will be present or easily contacted during the visit.
- The names of documentation listed in the Program, Compliance and Fiscal Documents section of the monitoring tool may need to be revised to accurately depict district documentation.

Federal Requirements for Monitoring

- NCLB Legislation
- Education Department General Administrative Regulations (EDGAR)
- General Education Provisions Act (GEPA)
- Single Audit Act
- OMB Circulars
 - A-133
 - A-87

Consolidated NCLB Oversight & Monitoring vs. Other NJDOE Evaluations

CONSOLIDATED NCLB MONITORING	OFAC AUDIT	QSAC	CAPA
District Level	District Level	District Level	School Level (SINI)
Current academic year	Previous academic year(s)	Current and previous academic year(s)	Current academic year
Program and Fiscal	Fiscal	Program and Fiscal	Program and Fiscal

Types of Monitoring

TARGETED REVIEW

- Initial contact made by NJDOE program office coordinator
- Program office will inform of protocol and documentation needed, results, follow up actions and/or next steps

FISCAL AUDIT

- Initial contact made by OFAC Staff
- OFAC staff will inform of protocol and documentation needed, results, follow up actions and/or next steps

Monitoring Team

ON-SITE VISIT

- Tony Hearn (Fiscal)
- Anthony Wright (Title I program)
- County Education Specialist (Titles IIA, IID, III, IV, V, VI)

DESK REVIEW AND TELEPHONE REVIEW

- County Education Specialist

TARGETED REVIEWS

- NJDOE Program Office Staff

FISCAL AUDIT

- NJDOE Office of Fiscal Accountability and Compliance staff

Documentation

On-site Visit

- List of documentation included in the NCLB On-site monitoring tool
- Prior to visit, NJDOE staff will review Comprehensive Needs Assessment, AYP data and NCLB Application via EWEG

Desk Review

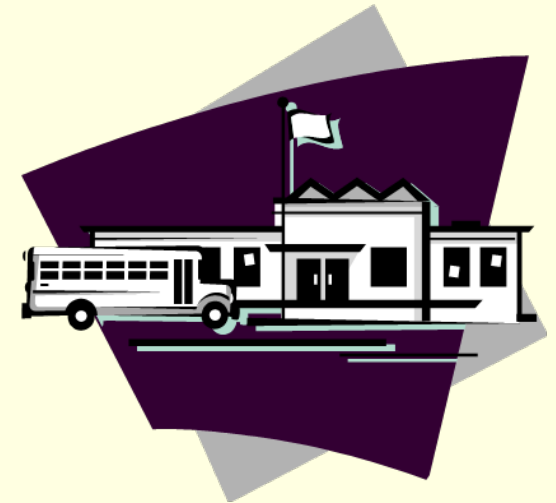
- Separate list of documentation (purple handout)
- Items marked with ☒ are accessible to county education specialist and do not need to be submitted unless otherwise notified by county education specialist

Telephone Review

- Prior to interview, county education specialist will review accessible information. They will request any additional documentation as needed.

On-site Process

- Initial contact from Tony Hearn (email will include documentation needed and monitoring tool)
 - tentative dates
 - asked to confirm
- Formal letter
 - confirm date/time/location
 - documentation needed
- Review of documentation on-site
- Interview appropriate staff
- Exit conference



Prior to the Visit

NJDOE Reviews

- Comprehensive Needs Assessment
- AYP data
- NCLB Application via EWEG



Who Should Be Present for the On-site Visit?

- NCLB Project Director
- Business Administrator
- Superintendent (available to be interviewed as needed)
- Other staff assigned to NCLB in Consolidated Application (available to be interviewed as needed)
- Nonpublic Representative(s) requested by NJDOE

Desk Review Process




- Initial contact made by county education specialist
- Documentation sent to county education specialist or other arrangements as directed by county education specialist
- County education specialist may ask to speak with NCLB staff as needed to clarify information.
- County education specialist will complete desk monitoring portion and submit to Office of Student Achievement & Accountability (OSAA)
- OSAA will follow up with results, follow-up actions if needed and/or next steps



Telephone Review Process

- Initial contact made by county education specialist
- LEAs should complete or review telephone tool prior to interview with county education specialist
- County education specialist will interview NCLB staff as needed.
- County education specialist will complete telephone monitoring tool and submit to Office of Student Achievement & Accountability (OSAA)
- OSAA will follow up with results, follow-up actions if needed and/or next steps

Monitoring Tools

- On-site
 - Comprehensive monitoring tool includes list of documents at end (white handout)
- Desk
 -  Includes only compliance requirements with folder icon
 - Separate list of documents (pink handout)
 - Items marked with ☒ are already accessible to county education specialist
- Telephone
 - Separate telephone tool (tan handout)
 -  Refer to comprehensive monitoring tool for more information on requirements.
 -  Telephone questions correlate to comprehensive tool

TITLE IIA

TEACHER AND PRINCIPAL TRAINING
AND RECRUITING FUND

Title IIA Funds



Provide the resources for:

- improving teacher and principal quality
- increasing the number of highly qualified teachers and principals in classrooms and schools

*Thereby...*raising student achievement in the academic subjects

Title IIA

- Title IIA focuses on preparing, training and recruiting high-quality teachers and principals
- Requires states to develop plans with annual measurable objectives
- Ensures that all teachers teaching in the core academic subjects are highly qualified.

Title IIA Key Elements

- Provides hold harmless funds for nonpublic schools based on FY 2002 levels of IASA – Title II and Class-Size Reduction
- Serves as a funding source for meeting requirements for teacher to be highly qualified.

Title IIA ~ Fiscal

- Documentation such as:
 - Certificated staff report (Fall Report)
 - Student-to-teacher ratios
 - School improvement identification status (AYP Status)
- Documentation that supports that PD funds are directed to schools that:
 - Have the lowest proportion of HQT:
 - Have the largest average class size: or
 - Are identified for school improvement.

Title IIA ~ Professional Development Activities

- Provide:
 - District Professional Development (PD) Plan
 - PD sign-in-sheets and agendas
 - Schedule time for 1-3 participant(s) to be interviewed
 - Documentation to verify that PD is consistent with funded activities

Title IIA ~ Professional Development Activities (con't)

- Documentation of PD activities that address NJCCCS strategies

- Continuous improvement is easily discernable and/or the continuum is explained

ex: School-based, job-embedded PD with teachers meeting in teams to collaborate, focused on student learning needs and increasing academic achievement.

TITLE IIA – Helpful Hints for Monitoring Highly Qualified Teachers (HQT)

- In 2008, districts electronically submitted a HQT plan. Provide access to the plan which describes:
 - An array of recruitment and retention strategies for hiring and retaining highly qualified teachers
 - Information on equitable distribution of teachers who are not highly qualified
- Beginning in 2008 the certificated staff report must indicate, for each teacher who is **not HQ** in his/her current teaching assignment, the strategies the particular teacher is using to achieve HQ status. The monitor will review this information for nonHQ teachers.

TITLE IIA – Helpful Hints for Monitoring Highly Qualified Teachers

- Prepare a sampling of at least 5 teachers who **are HQ** in their current teaching assignment.
- Provide access to information on these teachers as described:
 - Certificated staff report showing teacher as highly qualified
 - Schedule showing the teacher's current teaching assignment. (It should be possible for the monitor to review the teacher's assignment against the teacher's data on the certificated staff report.)
 - Documentation of the teacher's demonstration of content knowledge (attached to HQT forms) and New Jersey certificate(s) held.
 - Ensure HQT forms (w/appropriate documentation) are completed and signed off by the teacher's supervisor – the form must be completed for the current teaching assignment. Form G, the supervisor's sign-off statement, must be attached to each HQT form. (Some teachers are HQ in more than one area and may have 2 or more forms.)

TITLE IIA – Helpful Hints for Monitoring Highly Qualified Teachers

- Prepare a sampling of at least 5 teachers who are **not HQ**.
- Provide access to information on these teachers as described:
 - Certificated staff report showing teacher as not highly qualified and showing the strategy to be used to achieve HQ status.
 - Schedule showing teacher's current teaching assignment. (It should be possible for the monitor to review the teacher's assignment against the teacher's data on the certificated staff report.)
 - The teacher's HQT forms should indicate that the teacher has not yet achieved HQ status for the current teaching assignment.
 - HQT forms must be completed and filed each and every year for which the teacher is not HQ in the current assignment.
 - Once the teacher is highly qualified, the status and forms are permanent.

TITLE IIA – Helpful Hints for Monitoring Highly Qualified Teachers

- The district should demonstrate the distribution patterns of teachers across schools and grade levels/subjects.
 - The monitor will interview the staff member responsible for oversight of HQT requirements.
 - Be prepared to explain how the district determines whether (a) nonHQT teachers and (b) teachers with fewer than 3 years experience are disproportionately clustered in certain schools or grade levels/subjects. Provide any data collected revealing the distribution patterns.
 - Describe the strategies you are using to achieve a more equitable distribution of highly qualified and experienced teachers (if applicable).

TITLE IID

ENHANCING EDUCATION THROUGH
TECHNOLOGY

Title II – D ~ Professional Development

- Have POs available
- PD focus on integration of advanced technologies, including emerging technologies into curricula and instruction and in using those technologies to ***create new learning environments***
- *Nonpublic School Professional development is not included as part of the 25% PD requirement for public schools*

Title II – D ~ Professional Development – p.2

- 25% – Ongoing, high quality, sustained Professional Development
 - Technology integrated into content areas
- Carryover
 - 25% PD should have been met in previous year or,
 - 25% PD from previous year must be met in addition to 25% PD for new allocation
 - Intent - Funds should impact students in the allocated calendar year

Title II-D ~ Technology Proficiency

- What is the district's process to assess technological proficiency?
 - Have student samples available
- How are students with disabilities assessed?
- What is the remediation process if not proficient by end of 8th grade?

Title III

LANGUAGE INSTRUCTION FOR
LIMITED ENGLISH PROFICIENT AND
IMMIGRANT STUDENTS

Title III – Helpful Hints for Monitoring

- Verify that district uses funds to supplement language assistance programs (Copy of Title III. expenditures)
- Verify the parental notification for initial identification and placement of student in a language instruction program. (Copy of parent notification in English and native language, Copy of Parental Notification Policy and Procedures)

Title III – Helpful Hints for Monitoring

- Verify that all LEP students are assessed annually with the ACCESS for ELLs English Language Proficiency Test (Copies of Score Reports: District, School, Teacher, Parent)
- Verify that professional development workshops are based on scientific research, and are designed to improve English language proficiency for LEP students.

Title III – Helpful Hints for Monitoring

- Verify if district does not meet AMAOs, they must notify parents. If district did not meet AMAO for two consecutive years, they must complete an Improvement Plan. (Copy of parental notification letter in English and native language)
- Verify that district complies with NCLB requirement for Non-public or private schools. (Copy of non-public schools in jurisdiction, documentation of communication between district and non-public liaison)

TITLE IVA

SAFE AND DRUG-FREE SCHOOLS
AND COMMUNITIES

Title IVA–Helpful Hints for Monitoring

- Verify the *process* used to determine the schools and students with the *greatest need* for Title IV-A funds including the following:
 - The *data* reviewed and their sources;
 - The *results of the analysis* of the data;
 - The *priority needs* established for schools and students;
 - The identification of the schools and a description of the students with the greatest need for Title IV-A-funded programs, services or activities;
 - With whom the district consulted to help identify needs; and
 - How the consultation took place.

Title IVA–Helpful Hints for Monitoring

- ❑ Verify the appropriateness of the *goals and indicators* selected for the use of Title IV-A funds *and* describe *how* the goals and indicators *were determined* based on the needs assessment and analysis (not solely the recitation of data).

Title IVA–Helpful Hints for Monitoring

- Verify each program, service and activity funded under Title IV-A that the district is implementing to *achieve the goals and indicators* is a scientifically research-based program.
 - If a waiver to the scientifically research-based requirement has been requested for a Title IV-A-funded program, service or activity, verify that the rationale and research that justifies each waiver, and explain how each program, service or activity will achieve the goals and indicators.
 - Identify and describe which of the Title IV-A funded programs, services and activities are provided to the schools and students determined to have the *greatest need* for these programs, services and activities.

Title IVA–Helpful Hints for Monitoring

- If Title IV-A funds are used to support any *staff positions* or contracted staff services in the district, verify the following:
 - The position titles;
 - The specific functions for each position that is funded under Title IV-A;
 - How the functions support the scientifically research-based programs, services or activities; and/or
 - The rationale and research provided in the *waiver request(s)* that justifies the funded functions of the position (an approvable waiver request is required to fund any Title IV_A-funded position that does not directly support a science-based program).

Title IVA–Helpful Hints for Monitoring

- Verify evidence of district collaboration with parents and the community *specifically* regarding *Title IV-A-funded* programs, services and activities, including how the district consults with parents *both in the initial stages of design and development* of the Title IV-A application *and* on an ongoing basis for the *administration* of funded programs, services and activities, including efforts to meet the principles of effectiveness.
 - Include information on how the district *coordinates* its Title IV-A programs, services and activities with *other* related strategies, programs and activities being conducted *in the community*.

Title IVA–Helpful Hints for Monitoring

- Verify how the district *evaluates*, on an ongoing basis, the *achievement of its performance indicators* for substance abuse and violence prevention activities, including both specific reductions in identified risk factors and increases in protective factors, and how evaluation is used to refine, improve and strengthen the programs, services and activities funded under Title IV-A.
 - Identify the Title IV-A indicators in the EWEG application and the district's indicators documenting their performance in achieving the indicators.

Title IVA–Helpful Hints for Monitoring

- Verify the notification methods and mechanisms, *specific to Title IV-A*, that the district uses to:
 - Notify the community of its *intent* to submit an application for Title IV-A funds;
 - Notify the public of the *availability* of its Title IV-A application;
 - Report the districts *progress* toward achieving its Title IV-A goals; and
 - Provide *notice* that the *results of the evaluations* of Title IV-A programs, services and activities will be *available* to the public upon request

Title V

INNOVATIVE PROGRAMS

Title VA– Helpful Hints for Monitoring

- Title V not funded for 2009
- LEAs may continue transferability
- Districts can transfer FY09 funds from Title IIA, IID, and Title IV into Title V, Part A
- An LEA may transfer no more than 50% of its funds unless identified for improvement or corrective action, in which case this limitation is 30%
- If the LEA has unexpended FY08 Title VA funds, the funds may be carried over and used for allowable FY09 activities
- There is a wide use of funds covering 27 areas including teacher quality, professional development, class size reduction, technology, educational materials, etc.
- Be sure Title V funds were used by both district and the nonpublic schools, if any, for allowable costs



TITLE I

IMPROVING THE ACADEMIC
ACHIEVEMENT OF THE
DISADVANTAGED

Title I –Helpful Hints for Monitoring

- Follow the monitoring tool
- Organize in folders
- Know your AYP data
- Know district demographics
- Be ready to describe program

Title I Common Findings

- Title I Program Plan

- 28% LEAS did not have program plan that addressed the requirements of Title I
 - eligibility requirements lacking; many districts thought children had to be low-income to be serviced

- Parent Notification Letters

- 70% LEAS did not have clear entrance and exit criteria
 - did not include multiple measures used to identify students
 - notification requirements were not sufficient

Title I Common Findings

- SINI/SES
 - 86% LEAS had findings in these areas
 - late notification letters
 - improper information in letter
 - 44% LEAS had findings in these areas
 - not properly tracking SES costs on a per student basis and/or not knowing SES max per pupil amounts
- *Helpful hints:*
 - Sample SES letter and enrollment form; max per pupil amounts and other SES resources can be found:
<http://www.nj.gov/education/title1/program/ss/>

Title I Common Findings

- Tracking of Reserves
 - 65% were not properly tracking Title I reserves

- *Helpful hints:*
 - Track on a school level
 - Restricted reserves
 - Subject to the 15% Title I carry-over restriction.

Title I Common Findings

- Right to Know Letters
 - 33% were not properly implementing the Right-to-Know requirement under Title I
- *Helpful hints:*
 - Initial Letter at the beginning of the school year
 - Follow-up Letter after 4 weeks

Title I Common Findings

- Comprehensive Needs Assessment
 - 44% were running Title I programs with the “same as last year” approach
- *Helpful hints:*
 - Drilling down data to get to root cause of poor student performance will help districts’ development plans that will increase student performance.

Title I Common Findings

- Parent Involvement Policy
 - 60% did not have a current parent involvement policy that met NCLB requirements

- *Helpful hints:*

NJDOE Parent involvement website:

<http://www.nj.gov/education/title1/program/parent/>

Other Title I Common Findings

- EWEG D/W Program
- EWEG
- N&D Needs Agreement
- EWEG Changes
- Homeless Shelter
- SIA vs. Part A

- *Helpful hints:*
 - NJDOE Title I Website: <http://www.nj.gov/education/title1/>
 - NJDOE Title I email help: titleone@doe.state.nj.us

Title I Documentation

REMEMBER.... Supporting documentation such as:

- Teacher/Staff/Class/Master schedules
- Staff roster
- Time sheets
- Agendas, sign-in sheets, committee minutes and meeting notes
- Parent letters and evidence of distribution in appropriate languages
- Procedure/policy documents
- Comparability report
- SINI plans, school choice forms and correspondence
- SES letters, provider lists, enrollment forms, provider contracts
- Financial documents (CAFR, lease agreements, inventory records, invoices, purchase orders)



Possible Follow-Up Activity

- Written correspondence including findings, required and/or recommended action items
- Revisions to NCLB Consolidated Application

If there are significant findings...

- Meeting at NJDOE
- Refer to NJDOE program coordinator
- Meeting with county office of education
- Referral for Targeted Review or other type of intervention

Contact Information

County Offices of Education & Office of Student Achievement and Accountability

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