

**Fiscal Year (FY) 2015 U.S. Department of Education
Office of Safe and Healthy Students' Monitoring Report on
the Connecticut State Department of Education's
Title I, Part D Neglected, Delinquent or At-Risk Program and
Title VII-B Education for Homeless Children and Youth Program**

Scope of Review: During September 22-24, 2015, a review team from the U.S. Department of Education's (ED's) Office of Elementary and Secondary Education, Office of Safe and Healthy Students (OSHS) monitored the Connecticut State Department of Education's (CSDE's) administration of the Title I, Part D Neglected, Delinquent or At-Risk (Title I, Part D) program authorized by the Elementary and Secondary Education Act of 1965, as amended (ESEA), and the Title VII-B Education for Homeless Children and Youth (EHCY) program authorized by the McKinney-Vento Homeless Assistance Act.

Previous Monitoring: ED reviewed CSDE's Title I, Part D and EHCY programs during the week of September 10-13, 2007. ED made the following findings and recommendations related to these programs:

- For the EHCY program, the State Coordinator's salary was paid 100% from the McKinney-Vento allocation, but the FTE allocated to the program was 0.5 FTE.
- ED recommended that CSDE provide more oversight and guidance to local educational agencies (LEAs) regarding an appropriate method for determining the LEA reservations under Title I, Part A (Title I) of the ESEA for comparable services for homeless students enrolled in non-Title I schools.
- For the Title I, Part D program, ED recommended that CSDE provide more guidance to State agencies on how to improve parent involvement.

General State Educational Agency (SEA) Monitoring Requirement

A State's ability to fully and effectively implement program requirements under Title I, Part D and the EHCY programs is directly related to the extent to which it is able to regularly monitor its subgrantees and provide quality technical assistance based on identified needs.

Federal law does not specify the particular method or frequency with which States must monitor their grantees, and States have a great deal of flexibility in designing their monitoring systems. Whatever process is used, States should have mechanisms in place sufficient to ensure that they are able to collect and review critical implementation data with the frequency and intensity required to ensure effective and fully compliant programs under both Title I, Part D and the EHCY programs.

Under 2 C.F.R. §§ 200.328 and 200.331¹, grantees must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements.

¹ These requirements, which are part of the Office of Management and Budget's new Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform

Additionally, section 9304(a) of the ESEA requires that the SEA provide assurances, including assurances that (1) programs authorized under the ESEA are administered in accordance with all applicable statutes, regulations, program plans, and applications; and (2) the State will use such fiscal control and funds accounting procedures as will ensure the proper disbursement of, and accounting for, Federal funds paid to the state.

Status: As described more fully in EHCY finding 1.1.1, CSDE has not met the monitoring requirements with respect to LEAs that do not receive subgrants under the EHCY program.

Further action required: Please see the further action required under EHCY finding 1.1.1.

Emerging Practices: OSHS considers emerging practices to be operational activities or initiatives that contribute to successful outcomes or enhance agency performance capabilities. Emerging practices are those that have been successfully implemented and demonstrate the potential for replication by other agencies.

Typically, emerging practices have not been evaluated as rigorously as "promising," "effective," "evidence-based," or "best" practices but still offer ideas that work in specific situations. As a result of its monitoring activities, OSHS identified the following emerging practices for CSDE:

- CSDE's applications for Title I, Part D, Subpart 1 and Subpart 2 funding are formatted in alignment with the statutory requirements and assurances, making it easy to verify that all required components are addressed in each application.
- CSDE and the subgrantee LEA staff interviewed have been very responsive to and active in statewide efforts to get a more accurate count of homeless youth residing in the State, particularly unaccompanied homeless youth. In part as a result, youth have received improved services in some parts of the State, including northwestern Connecticut.
- The early childhood education program and homeless services sector coordinate comprehensively and include CSDE and LEAs in their coordination efforts. A Governor-appointed Children's Cabinet includes an early childhood homelessness committee that is developing its own action plan and involves the EHCY State Coordinator and Head Start State Collaborator. As a result, in several communities around the State, Head Start programs, school districts and family homeless shelters are coordinating in innovative ways to prioritize and address the needs of young children experiencing homelessness and connect them to services.

Guidance), first applied to the Title I, Part D and EHCY programs beginning the grant awards made on or after July 1, 2015. A commensurate requirement at 34 C.F.R. § 80.40 previously applied.

Monitoring Area: Title I, Part D

In its review of the Title I, Part D program, the ED team examined:

- The State’s application for funding, procedures and guidance for State agency (SA) applications under Subpart 1, including institution-wide project plans, and LEA applications under Subpart 2;
- The technical assistance that CSDE provided to SAs and LEAs;
- CSDE’s oversight and monitoring plan and activities; and
- SA and LEA subgrant plans and local evaluations for projects in the Department of Corrections (USD#1) and Department of Child and Family Service (USD#2) programs and the Litchfield and Region 13 school districts.

The ED team interviewed LEA staff of the Title I, Part D, Subpart 2 programs in the school districts of Litchfield (Touchstone) and Region 13 (Rushford Academy). The ED team also interviewed Title I, Part D, Subpart 1, State agency representatives from CSDE’s USD#1 (Department of Corrections) and USD#2 (Department of Child and Family Services) programs. The ED team also interviewed the Title I, Part D State coordinator to confirm information obtained at the local sites and discuss administration of the program.

Based on their review, ED has the following observation, recommendation and finding:

Indicator 1.1 - The SEA conducts monitoring and evaluation of its subgrantees sufficient to ensure compliance with Title I, Part D program requirements and progress toward Federal and State program goals and objectives.

Recommendation 1.1.1

Observation: There was relatively low program performance among the LEA programs compared to State and national averages, as revealed by analysis of:

- (1) CSDE’s 2012-2013 and 2013-2014 Consolidated State Performance Report (CSPR) section 2.4.2.3.2, which includes data on Academic and Vocational Outcomes While in the LEA Program/Facility or Within 90 Calendar Days After Exit; and
- (2) CSPR section 2.4.2.6, which includes data on Academic Performance of Long-term Students in Reading and Math.

To its credit, CSDE has recognized that there is room for improvement in the area of data collection and analysis of Title I, Part D performance data at the LEA and program level as a means to improve student and program outcomes. CSDE has been working with a data consultant to assist with this.

Recommendation: ED recommends that CSDE consider carrying out further analyses and activities in order to identify and address factors contributing to low LEA program performance. These activities and analyses could include, but are not limited to one or more of the following recommended activities:

- Providing additional technical assistance to subgrantees on how to evaluate Title I, Part D-funded programming and activities by using Title I, Part D specific performance data to evaluate the effectiveness of those activities in improving performance on Title I, Part D outcome measures required for the CSPR.
- Asking subgrantees for an annual program evaluation that accounts for any change in performance of the previous two year’s Part D program performance data to be included in the annual grant application from each SA and LEA that receives a subgrant or in a final grantee report for the performance period.
- Piloting earlier post-tests (for example, after 20 days or 45 days, depending on average length of stay) or more frequent academic assessments to help identify problem areas of student progress that may require adjustments to the educational program.

Table 1. Summary of Monitoring Results for the Title I, Part D Neglected, Delinquent or At-Risk Program

Indicator Number	Description	Status	Page
1.1	The SEA conducts monitoring and evaluation of its subgrantees sufficient to ensure compliance with Title I, Part D program requirements and progress toward Federal and State program goals and objectives.	Met Requirements 1 Recommendation	3-4
2.1	The SEA ensures that SA programs for eligible students meet all requirements, including facilities that operate institution-wide projects.	Met Requirements	N/A
2.2	The SEA ensures that LEA programs for eligible students meet all requirements.	Met Requirements	N/A
3.1	The SEA ensures each State agency complies with the statutory and other regulatory requirements governing State administrative activities, providing fiscal oversight of the grants including reallocations and carryover, ensuring subgrantees reserve funds for transition services, demonstrating fiscal maintenance of effort and requirements to supplement not supplant.	Met Requirements	N/A

3.2	The SEA ensures each LEA complies with the statutory and other regulatory requirements governing State administrative activities, providing fiscal oversight of the grants including reallocations and carryover, and allowable uses of funds.	Met Requirements	N/A
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Monitoring Area: McKinney-Vento Homeless Education Program

In its review of the EHCY program, the ED team examined:

- the State's procedures and guidance for the identification, enrollment, and retention of homeless students;
- technical assistance provided to LEAs with and without subgrants;
- the State's McKinney-Vento application; and
- LEA applications for subgrants and local evaluations for projects in Hartford Public Schools and Education Connection (northwestern Connecticut), as well as the local liaisons and staff from East Hartford and Torrington Public Schools, both non-subgrantee school districts.

The ED team also interviewed the McKinney-Vento State coordinator to confirm information obtained at the local site and discuss administration of the program. Based on their review, ED has the following observations and recommendations:

Indicator 1.1: Monitoring and evaluation of LEAs with and without subgrants

Finding 1.1.1

Legal Requirement: Under 2 C.F.R. §§ 200.328 and 200.331, grantees must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements. Additionally, section 9304(a) of the ESEA requires that the SEA provide assurances, including assurances that (1) programs authorized under the ESEA are administered in accordance with all applicable statutes, regulations, program plans, and applications; and (2) the State will use such fiscal control and funds accounting procedures as will ensure the proper disbursement of, and accounting for, Federal funds paid to the state.

Finding: CSDE has not ensured that LEAs without subgrants are adequately monitored for compliance with the McKinney-Vento statute. During FY 2015, only a few non-subgrantee LEAs were monitored and there was no schedule for upcoming monitoring of non-subgrantee LEAs.

Further Action Required: CSDE must submit to ED a monitoring plan that will ensure compliance with applicable Federal requirements including a document review and interview protocol for LEAs without subgrants.

There are different ways a monitoring plan can be created to ensure sufficient oversight of McKinney-Vento requirements in all LEAs that build on existing CSDE procedures. Given the relatively large number of LEAs in Connecticut, this monitoring plan should be designed based on a risk assessment so that all LEAs can be monitored, but the higher risk ones receive a more extensive review including document reviews and remote or on-site interviews. To the extent that almost all LEAs are completing a self-assessment monitoring instrument for Title I, Part A requirements or being interviewed by CSDE,

this process could also include some McKinney-Vento implementation questions. For example, general McKinney-Vento requirements shared by all districts in the State are to conduct outreach and identification of homeless children and youth, arrange for immediate enrollment and/or school of origin transportation if requested, operate a dispute resolution procedure and conduct community outreach and coordination of services for students experiencing homelessness.

Recommendation 1.1.1

Observation: CSDE's applications for EHCY subgrants included action steps in meeting the main goals for the project each year. If the goals or action steps were missing or inadequate, they were required to be completed or revised as part of the monitoring process. Neither of the two reviewed subgrant projects included measurable goals that referenced baseline measures or annual milestones toward attaining those goals over three years.

Recommendation: ED recommends that CSDE provide technical assistance to its subgrantees on creating goals (measurable to the maximum extent appropriate) that include baseline performance measures and annual milestones. Subgrantees may not be fully aware of LEA data reported by SEAs to ED via the ED*Facts* Reporting System. These data include graduate and dropout numbers for homeless students and proficiency in math, reading and science, grades 3-8, at the LEA and school levels.

One approach that CSDE may wish to consider is to ask subgrantees for an annual program evaluation that accounts for any change in performance of the previous two year's EHCY program performance data at the LEA and school levels.

Furthermore, as one example of creating measurable goals, Hartford Public Schools had recently developed a strategic plan that included baseline measures and five-year goals in several areas that are also particularly important for improving educational outcomes for homeless students. These goals included increasing graduation rates and reducing achievement gaps, dropout rates and chronic absenteeism for all students.

Indicator 2.1 - The SEA implements procedures to address the identification, enrollment, and retention of homeless students through coordinating and collaborating with other program offices and State agencies.

Finding 2.1.1:

Legal Requirement: Section 1113(c)(3)(A) of the ESEA requires an LEA to reserve funds from its Title I, Part A allocation to provide comparable services for homeless students not attending Title I schools, including providing educationally related support services to children in shelters or other locations where homeless children reside.

Additionally, section 1112(b)(1)(O) of the ESEA requires LEAs to include in their consolidated Title I, Part A plan application a description of the services they will provide with funds reserved under section 1113(c)(3)(A) of the ESEA.

Finding: East Hartford Public Schools did not reserve funds to provide comparable services to homeless students enrolled in non-Title I schools, and Torrington Public Schools only did this following a monitoring review in spring 2015.

CSDE had no process to determine if all LEAs operating Title I, Part A programs with homeless students enrolled in non-Title I schools have made reservations that are sufficient to provide comparable services.

Further action required: CSDE must develop and implement a plan to ensure that LEAs reserve sufficient funds from their Title I, Part A allocations to provide comparable services for homeless students not attending Title I, Part A schools. To ensure that LEAs are aware of the requirement and are reserving sufficient amounts to provide comparable services, this plan should include providing information, guidance and technical assistance to LEAs regarding the reservation. Procedures to ensure compliance could be implemented in a variety of ways, including the following:

- Developing a list of LEAs with homeless reservations and comparing it to a list of LEAs with non-Title I schools and significant homeless student enrollment. There are also data available on the number of homeless students in every LEA who are served in Title I targeted assistance or schoolwide programs. CSDE could subtract these served data from the homeless enrolled data by LEA to identify which LEAs may have significant numbers of homeless students enrolled in non-Title I schools and for whom the LEA set-asides should be checked.
- Reviewing LEAs with low set-aside amounts by both program offices at CSDE. For any LEA with a possibly significant number of homeless students enrolled in non-Title I schools, the EHCY State Coordinator and Title I State Director could review the set-aside amount and recent data on homeless student enrollment in the district to determine whether the set-aside is sufficient.
- Requiring a minimum LEA reservation amount based on the number of homeless students enrolled in non-Title I schools. CSDE could also review the amount expended on comparable services in the latest fiscal year for which homeless student enrollment and comparable service expenditure data are available and compare them with the current year to determine whether any current LEA set-asides may be insufficient. Those LEAs should be identified for additional technical assistance or monitoring as appropriate.

**Table 2. Summary of Monitoring Results for the Title VII-B
Education for Homeless Children and Youth Program**

Indicator Number	Description	Status	Page
Indicator 1.1	The SEA conducts monitoring and evaluation of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements.	1 Required Action 1 Recommendation	5-6
Indicator 2.1	The SEA implements procedures to address the identification, enrollment, and retention of homeless students through coordinating and collaborating with other program offices and State agencies.	1 Required Action	6-7
Indicator 2.2	The SEA provides, or provides for, technical assistance to LEAs to ensure appropriate implementation of the statute.	Met Requirements	N/A
Indicator 3.1	The SEA ensures that LEA subgrant plans for services to eligible homeless students meet all requirements.	Met Requirements	N/A
Indicator 3.2	The SEA complies with the statutory and other regulatory requirements governing the reservation of funds for State-level coordination activities.	Met Requirements	N/A
Indicator 3.3	The SEA has a system for ensuring the prompt resolution of disputes.	Met Requirements	N/A