

**Fiscal Year (FY) 2015 U.S. Department of Education  
Office of Safe and Healthy Students' Monitoring Report on  
the Pennsylvania 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 June 2-4, 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 Pennsylvania Department of Education's (PDE'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 program (EHCY) under the McKinney-Vento Homeless Assistance Act.

**Previous Monitoring:** ED reviewed PDE's Title I, Part D and EHCY programs during the week of March 3-7, 2008. ED made the following findings related to these programs:

- For the Title I, Part D program, the PDE needed to ensure that all institution-wide project (IWP) plan elements were being addressed by facilities operating IWPs.
- For the EHCY program, the PDE needed to ensure that all local educational agencies (LEAs) were providing homeless student enrollment data by grade level so that their educational needs were being recognized and addressed.
- For the EHCY and ESEA Title I, Part A (Title I) programs, the PDE needed to check the LEA reservations for comparable services both for accuracy and to ensure that all LEAs with homeless students enrolled in non-Title I schools were meeting this requirement.

**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 program 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, it is expected that States 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 the Title I, Part D and EHCY programs.

Under 34 C.F.R. § 80.40<sup>1</sup>, grantees must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements. Additionally, section 9304(a)

---

<sup>1</sup> A commensurate requirement is contained in the Office of Management and Budget's new Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform

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: PDE has met the monitoring requirements under 34 C.F.R. § 80.40 for both programs.

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 PDE:

**Title I, Part D Program:**

- PDE has updated their 2015-2016 Title I, Part D subgrant application to include performance goals for N or D facilities requesting funding. By requiring facilities to establish targets for student and program performance, PDE will have an improved ability to measure the progress being made by N or D facilities and identify areas where additional attention and resources may be needed.
- Youth correctional facilities in Pennsylvania offer students the opportunity to earn a Commonwealth Secondary School Diploma (CSSD), a high school equivalency credential. This is an alternative to completing the GED test preparation program. The CSSD enables youth to complete regular academic coursework and has been advantageous for gaining employment or progressing in post-secondary education.
- The SEA has created a Distinguished Institution Award that uses Title I, Part D, Subpart 2 funds that have not been spent at the end of the year to reward facilities for exceptional work and innovative practices. This is a competitive award for which all LEA subgrantees can apply. Depending on available funds, the SEA makes 4-5 awards of approximately \$20,000 annually to further support the work of the winning LEAs.

**Education for Homeless Children and Youth Program:**

- For the past five years, the PDE has used approximately five percent of its reservation for State-level EHCY coordination activities to improve the quality of

---

Guidance) at 2 C.F.R. § 200.328, which applies to the Title I, Part D and EHCY programs beginning with the grant awards made on or after July 1, 2015.

data being reported by all regional offices and LEAs as well as to evaluate the statewide program, recommend improvements, and provide assessments of needs to further address.

### **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 PDE provided to SAs and LEAs;
- PDE’s oversight and monitoring plan and activities; and
- SA and LEA subgrant plans and local evaluations for projects in the Philadelphia City School District (Pennypack House and the Juvenile Justice Center Schools), the Abraxis Youth Center and Leadership Development Program, the North Central Secure Treatment Unit, the Loysville Youth Development Center, and Youth Forestry Camp #3.

The ED team toured the Abraxis facilities and interviewed LEA staff of Part D, Subpart 2 programs administered by the Philadelphia Intermediate Unit (Pennypack House and JJ Center Schools) and the Lincoln Intermediate Unit (Abraxis Youth Center and Leadership Development Program).

The ED team also interviewed:

- the Title I, Part D, Subpart 1, SA representatives from the North Central Secure Treatment Unit (Capitol Area IU #15), the Loysville Youth Development Center (Central Susquehanna IU #16), and Youth Forestry Camp #3 (Tuscarora IU #11);
- 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 observations, recommendations, findings, and corrective actions:

**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: The State of Pennsylvania has a very high number of juvenile correctional facilities that are spread over a large geographical area. In addition to the State Coordinator, there are seven Regional Coordinators who help PDE

manage the monitoring and evaluation of subgrantees. While there are systems in place for monitoring and collecting program data from facilities, there is room for improvements to these systems that will enhance the State Coordinator's understanding of the program's performance.

Recommendation: ED recommends that the State Coordinator work more closely with the data manager responsible for collecting Consolidated State Performance Report (CSPR) data to ensure that all facilities submit the required data and that these data are analyzed to detect program issues that require further investigation. The State Coordinator should also work more closely with the Regional Coordinators to ensure that they are familiar with the CSPR data from the facilities they monitor, understand how to analyze these data, and follow-up with facilities to create plans for addressing areas of low performance.

**Indicator 2.1 - The SEA ensures that SA programs for eligible students meet all requirements, including facilities that operate institution-wide projects.**

**Recommendation 2.1.1**

Observation: The Institution-Wide Project (IWP) plans for the SA facilities include the required elements outlined in Section 1416 of the ESEA, but they do not fully describe the instructional program, pupil services, and procedures that will be used to meet the needs of the youth who are served by the as required by Section 1416(4). This makes it difficult for anyone reading the IWPs to get a clear overview of the program.

Recommendation: Whenever possible, ED recommends that PDE use the program description information in the Proposed Educational Program (PEP) documents for each SA program to update the IWP plans. The PEP documents are very well written and include detailed information about the instructional program and other services at each facility. Providing additional narrative about the instructional program in the IWP plans will enable anyone reviewing them to gain a better understanding of the program and how services are provided to youth.

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

<b>Indicator Number</b>	<b>Description</b>	<b>Status</b>	<b>Page</b>
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
2.1	The SEA ensures that SA programs for eligible students meet all requirements, including facilities that operate institution-wide projects.	Met Requirements 1 Recommendation	4
2.2	The SEA ensures that LEA programs for eligible students meet all 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

**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;
- the 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 Region 1 (Philadelphia) and Region 3 (out of Lincoln Intermediate Unit), as well as the local liaison from York Public Schools, a non-subgrantee school district.

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 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.**

**Recommendation 2.1.1**

Observation:

Coordination of the EHCY and Title I, Part A programs at the State and LEA levels could be improved significantly. The need for this improved coordination was evident in the following problematic situations involving: (1) the LEA set-asides from Title I, Part A to provide comparable services to homeless students enrolled in non-Title I schools (which is mandatory); and (2) the provision of additional support services for homeless students enrolled in Title I schools (which is optional):

- The list of Title I, Part A set-asides for comparable services to homeless students in non-Title I schools indicates that many LEAs had not reserved any funds. When asked, some regional coordinators and a liaison noted that all or most schools are Title I schools in their districts, but the SEA staff did not know whether that was the case for all districts.
- LEA reservations had been significantly reduced for some large LEAs over the past few years while the number of homeless students identified had increased.
- One district reported spending approximately \$50,000 on the excess cost of school of origin transportation, but that information was not in the Title I, Part A reservation information provided.

Recommendation:

ED recommends that PDE develop and implement strategies to improve coordination between EHCY and Title I, Part A program staff at the SEA and LEA levels. Examples of these strategies, could include, but not be limited to:

- Having all LEAs report all Title I, Part A reservations of funds to serve homeless students and monitor their expenditure by having staff from both programs review them and any adjustments.
- As homeless student enrollment fluctuates from year to year or within a school year, LEAs should consider adjusting the reservation amounts. Fiscal Year (FY) 2014 and FY 2015 Congressional appropriations language for Title I, Part A allows LEAs to reserve additional amounts for

serving homeless children and youth even in Title I schools (e.g., paying for the excess cost of school of origin transportation, a local liaison’s salary, or educationally-related support services).

- LEAs that have not reserved any funds but have homeless students enrolled, or all Title I schools, should describe how the educational needs of homeless students will be addressed by the Title I, Part A program at the district and school levels. One way to identify homeless students' educational needs is by having LEAs and schools use achievement data that they have for all their students from State assessments to design programs to improve the achievement of homeless students

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

<b>Indicator Number</b>	<b>Description</b>	<b>Status</b>	<b>Page</b>
Indicator 1.1	The SEA conducts monitoring and evaluation of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements.	Met Requirements	N/A
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.	Met Requirements 1 Recommendation	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