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Preparing for  
*NCLB* Consolidated Formula  
Subgrant  
Oversight & Monitoring

*NCLB* Implementation Training  
Somerset Doubletree Meeting Center  
*January 22, 2009*

# Main Purpose

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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

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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

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

# NCLB Consolidated Formula Subgrant Oversight & Monitoring

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

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4 Working groups that were formed to address new oversight and monitoring process:

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

# Potential Ramifications of Oversight & Monitoring Noncompliance for NJDOE

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- ❖ 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 Application.

# Recent & Upcoming USDOE *NCLB* Oversight & Monitoring

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

# District Selection

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## Risk Assessment Model

1. 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

# Types of *NCLB* Consolidated Formula Subgrant Oversight & Monitoring

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- Application Review
- Desk Monitoring
- Telephone Interview
- Onsite Monitoring
- Targeted Review
- Fiscal Audit

# Federal Requirements for Oversight & Monitoring

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- *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 <i>NCLB</i> OVERSIGHT & MONITORING	OFAC AUDIT	NJQSAC	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

# Oversight & Monitoring Teams

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## APPLICATION REVIEW

- NJDOE Grants Management (Fiscal)
- County Education Specialists (Program)

## ONSITE VISIT

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

## DESK REVIEW AND TELEPHONE INTERVIEW

- County Education Specialists

## TARGETED REVIEWS

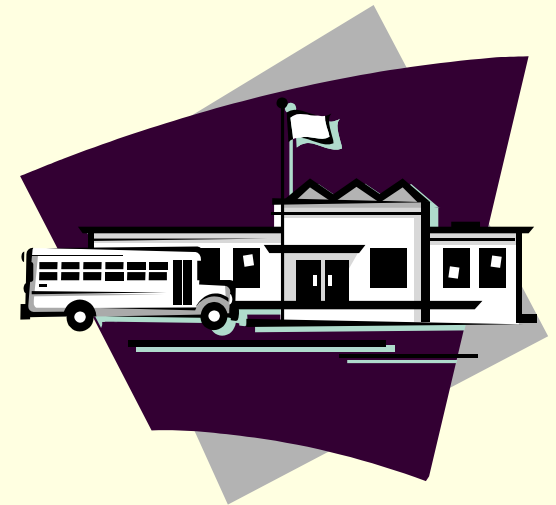
- NJDOE Program Office Staff

## FISCAL AUDIT

- NJDOE Office of Fiscal Accountability and Compliance staff

# Onsite Process

- Initial contact from Tony Hearn (email with documentation needed and monitoring tool)
  - tentative dates
  - asked to confirm
- Formal letter
  - confirm date/time/location
  - documentation needed
- Review of documentation onsite
- 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 Onsite Visit?

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- NCLB Project Director
- Business Administrator
- Superintendent (available to be interviewed as needed)
- Other staff assigned to NCLB Consolidated Formula Subgrant Application (available to be interviewed as needed)

# Desk Review Process

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- 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 and any actions and/or next steps if needed






# Telephone Review Process

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- 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 and any actions and/or next steps if needed

# Monitoring Tools

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- Onsite
  - Comprehensive monitoring tool includes list of documents at end (white handout)
- Desk
  -  Includes only compliance requirements with folder icon
  - Separate list of documents (purple 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

# Documentation

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## Onsite Visit

- List of documentation included in the *NCLB* Onsite 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.

# Types of Monitoring

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## **Targeted Review**

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

# TITLE II, PART A

TEACHER AND PRINCIPAL TRAINING  
AND RECRUITING FUND

# Title IIA

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- 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

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

# Title IIA - Fiscal

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- 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

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- Provide:
  - District Professional Development (PD) Plan
  - PD sign-in-sheets and agendas
  - Documentation to verify that PD is consistent with funded activities and NJ CCCS
  - Schedule time for 1-3 participant(s) to be interviewed
  - Continuous improvement is easily discernable and/or the continuum is explained

# Title IIA – Helpful Hints for Monitoring Highly Qualified Teachers (HQTs)

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- In 2008, districts electronically submitted a HQT plan. Provide access to the plan.
- 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 non HQ teachers.

# Title IIA – Helpful Hints for Monitoring HQTs

- 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 HQTs

- Prepare a sampling of at least 5 teachers who are not HQ and 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 HQTs

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- 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) non HQ 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 II, PART D

ENHANCING EDUCATION THROUGH  
TECHNOLOGY

# Title IID - Professional Development

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- 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***
- *Non-public School Professional development is not included as part of the 25% PD requirement for public schools*

# Title IID - Professional Development (continued)

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- 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 IID - Technology Proficiency

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- 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 8<sup>th</sup> grade?

# TITLE III, PART A

LANGUAGE INSTRUCTION FOR  
LIMITED ENGLISH PROFICIENT AND  
IMMIGRANT STUDENTS

# Title IIIA – Helpful Hints for Monitoring

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- 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 can be found at the following website: <http://www.nj.gov/education/bilingual/resources/letter/>).

# Title IIIA – Helpful Hints for Monitoring

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- 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 IIIA – Helpful Hints for Monitoring

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- 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 can be found at the following website:  
<http://www.nj.gov/education/bilingual/title3/accountability/notification/>).
- 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 IV, PART A

SAFE AND DRUG-FREE SCHOOLS  
AND COMMUNITIES

# Title IVA – Helpful Hints for Monitoring

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## NEEDS ASSESSMENT

- Verify the **process** used to determine the schools and students with the ***greatest need*** for Title IVA funds including the following:
  - *Data* and sources;
  - *Results of the analysis* of the data;
  - *Priority needs for both schools and students*;
  - *Who* the district consulted; and
  - *How* the consultation took place.

# Title IVA – Helpful Hints for Monitoring

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- Verify the appropriateness of the *goals and indicators* selected for the use of Title IVA funds. Is there evidence of:
  - *How* the goals and indicators were determined;
  - Whether goals and indicators were based on the needs assessment and the *analysis* of data.

# Title IVA – Helpful Hints for Monitoring

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## PROGRAMS, SERVICES AND ACTIVITIES

- Verify that each program funded under Title IVA is a scientifically research-based program.
  - If a waiver to the scientifically research-based requirement has been requested, verify that:
    - The rationale and research justifies each waiver; and
    - It is clear how the program will achieve the identified goals and indicators.
- Verify that Title IVA funded programs, services and activities are provided to the schools and students with the *greatest need*.

# Title IVA – Helpful Hints for Monitoring

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- If Title IVA funds are used to support any *staff positions* or contracted staff services in the district, verify the following:
  - Position titles;
  - Specific functions for each position; and
  - How the functions support the scientifically research-based program and/or approvable waiver.

# Title IVA – Helpful Hints for Monitoring

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- Verify evidence of district collaboration with parents and the community *specifically* regarding *Title IVA-funded* programs. Evidence should verify:
  - How the district consults with parents:
    - In the initial stages of design and development of the Title IVA application; *and*
    - On an ongoing basis;
  - Efforts to meet the principles of effectiveness;
  - How the district *coordinates* its Title IVA programs, with *other* related strategies, programs and activities *in the community*.

# Title IVA – Helpful Hints for Monitoring

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## EVALUATION:

- Verify how the district *evaluates*, on an ongoing basis, the *achievement of its performance indicators*;
- Verify how evaluation is used to refine, improve and strengthen Title IVA funded programs.

# Title IVA – Helpful Hints for Monitoring

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

# TITLE V, PART A

INNOVATIVE PROGRAMS

# Title VA – Helpful Hints for Monitoring

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- Title VA not funded for 2009
- LEAs may continue transferability
- Districts can transfer FY 2009 funds from Title IIA, IID, and Title IV into Title VA
- 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 FY 2008 Title VA funds, the funds may be carried over and used for allowable FY 2009 activities
- There is a wide use of funds covering 27 allowable areas including teacher quality, professional development, class size reduction, technology, educational materials, etc.
- Be sure Title VA funds were used by both district and the non-public schools, if any, for allowable costs

# TITLE I

IMPROVING THE ACADEMIC  
ACHIEVEMENT OF THE  
DISADVANTAGED

# Title I – Helpful Hints for Monitoring

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

# Title I Common Findings

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- 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

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## ■ 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 at:  
<http://www.nj.gov/education/title1/program/ss/>

# Title I Common Findings

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- 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

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- 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

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- 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

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- 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

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- 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](mailto: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 Activities

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- Written correspondence including findings, recommendations, required and/or recommended action items
- Revisions to *NCLB* Consolidated Formula Subgrant 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

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## County Offices of Education & Office of Student Achievement and Accountability

- OSAA Phone Number: (609) 943-4283
- Email:
  - [Titleone@doe.state.nj.us](mailto:Titleone@doe.state.nj.us)
  - [Anthony.Hearn@doe.state.nj.us](mailto:Anthony.Hearn@doe.state.nj.us)
  - [Anthony.Wright@doe.state.nj.us](mailto:Anthony.Wright@doe.state.nj.us)
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