

FEDERAL EHCY MONITORING AND RISK ASSESSMENT

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FY 2015-16 Monitoring in OSHS

- FY '16 Monitoring Plan and FY '15 State reports <http://www2.ed.gov/programs/homeless/performance.html>
- Fewer EHCY findings; some recommendations concerning Title I, Part A coordination
- **Changes to process:** more remote reviews and LEA panel interviews; EHCY reports to separate; no exit conference or preparatory webinar; draft report out in 40 days; SEA response in 30—may resolve or rebut findings, then removed from report; emerging practices commended

Questions for Planning Changes

- Do we review more States more frequently or fewer States more intensively?
- To what extent can we conduct mainly desk and remote reviews?
- How much of our review process should be public? (document review checklists, interview protocols)
- What factors (and data) do we prioritize in risk assessments, monitoring indicators, and reports?

New Influences on Monitoring

- ED's Uniform Guidance, effective for EHCY as of 7/1/15, requires SEAs to have subgrantee risk assessment and monitoring plan
- ED's forthcoming (internal) "Guide for Managing Formula Grant Programs" requires risk assessment and monitoring plan including on-site and desk review
- OESE's "Guidance for Monitoring Plans" (December 2012) requires annual monitoring plans of program offices and more performance management; leading indicators implementation

Planning for FY 2017 Changes

- Add Indicator 1.2 on Evaluation or Performance Management
 - Incomplete or inconsistent LEA/SEA data in CSPR or *EDFacts* must be corrected
 - Recommendations concerning poor performance or not implementing leading indicators
- Indicator 2.1 to absorb dispute resolution policy and practice and Title I, Part A coordination removed
- Indicator 2.2 will focus on TA to non-subgrantee LEAs (monitoring of them still under 1.1)

Planning for FY '17 Changes (Cont'd)

- EHCY Subgrant oversight (3.1)
 - Extended questions about available balances, irregular drawdowns, time and effort sheets, equipment lists, contracts
- State level coordination activities (3.2)
- Title I, Part A homeless set-asides (3.3), required and optional, process for determining them

2016 Risk Assessment Plans

Risk assessments will use more fiscal and performance data to determine low, elevated and significant risk States (1, 2 or 3):

- 10%: allocation size (<\$500K, <\$1M, >\$1M)
- 10%: SC turnover in 2-5 years (0, 1-2, 3+)
- 10%: Past findings/recs (0, 1-2, 3+)
- 10%: large balance warnings (0, 1, 2+)
- 20%: Math/reading performance
- Other: underidentification; chronic absenteeism, dropouts, graduation rates, complaints

Selection of LEAs to Interview

- Compare homeless student enrollment count to FRPL count for LEA; if $<1.35\%$ add to pool;
- Look at EHCY and Title I, Part A homeless students served; if $<50\%$, flag;
- Look at dropout numbers and graduates/completers; flag if missing, high or low
- Mix of high and low performers: all findings and recommendations are to SEA

Public Reporting and Preparation

- Allow SEA to resolve or rebut findings (and recommendations), OSHS removes from report but documents in SEA response letter?
- Post final report on EHCY performance website?
- Send CSSO a final report (link)?
- Periodic analysis and communication to field about common findings and recommendations?
- Self-assessment instrument (TA) to mimic on-line submission of documents, responses to questions?