



Office of Safe and Healthy Students

Education of Homeless Children and Youths Program

FY 2017 and 2018 Monitoring Plan

**December
2017**

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I. Introduction

In 2015, the Every Student Succeeds Act (ESSA) amended the McKinney-Vento Homeless Assistance Act (McKinney-Vento) and authorized new requirements for State educational agencies (SEAs) and local educational agencies (LEAs) for the Education for Homeless Children and Youth (EHCY) program starting on October 1, 2016. This document provides important information to SEAs and LEAs regarding the Federal EHCY program office's revised and expanded monitoring process, which is being developed and piloted during Federal fiscal year (FY) 2017 and will be implemented in FY 2018.

Monitoring the implementation of Federal programs, their performance, and the use of Federal program funds is an essential function of the U.S. Department of Education (the Department) and the Office of Safe and Healthy Students (OSHS), which administers the Federal EHCY program. OSHS is redesigning its monitoring process so that States will be more knowledgeable and prepared for program reviews and will continue improving and strengthening their administration of State and local EHCY programs.

The OSHS EHCY program's monitoring plan identifies and describes:

- performance management goals;
- monitoring categories and indicators;
- monitoring authority;
- monitoring process; and
- revised monitoring instruments.

II. Performance Management

A highlight of this revised monitoring plan is the greater emphasis placed on collaboration between the Federal EHCY program office and the State Office of the Coordinator. Through greater emphasis placed on SEA and LEA-level data analyses, the Department, OSHS, and the National Center for Homeless Education (NCHE) are able to target State specific technical assistance (TA) to improve the performance of statewide programs serving homeless students. When a State is selected for monitoring, OSHS and NCHE will coordinate and analyze data submitted by the State and will develop visual displays, such as maps, charts, and graphics, to help SEAs and LEAs boost the performance of students experiencing homelessness. These analyses will be shared with the SEA and LEA staff in advance of their scheduled remote or on-site interviews. Even if a State is not being monitored in a given fiscal year, the State Coordinator is invited to contact the Federal EHCY program office or NCHE with questions or requests for support in analyzing their data on homeless students.

While the Department has been collecting and analyzing performance data from SEAs for the Federal EHCY program since its inception in 1988, the Department has continued to redesign and develop new analyses of the data collected to support SEAs, LEAs, and schools in identifying and serving students experiencing homelessness. For example, in 2014, the Federal EHCY program office developed a logic model and leading indicators that could be predictive of outcomes, such as reducing chronic absenteeism in order to increase homeless student

achievement, using LEA and school- level data submitted to the Department by SEAs. Due to the increasing scope of data provided to the Department by SEAs annually, OSHS has created data dashboards (a collection of comprehensive spreadsheets) for all States and all LEAs in States selected for monitoring to assist SEAs in their own program monitoring and development of targeted professional development and TA. Additionally, through the analyses of LEA-level data, SEAs can create annual work plans to improve statewide performance on measures SEAs identify as priorities for their EHCY programs.

The data dashboard developed for the OSHS EHCY program's FY 17 and 18 monitoring process includes the following:

- grant allocation size;
- year-end available grant balance;
- the number of homeless students identified or served in the State;
- the percentage of students who are proficient in or making gains in reading and mathematics compared to national averages for the program and other subgroups of students;
- number of State Coordinator turnovers within the past 2-3 years;
- the number of previous findings and delays in resolving findings; and
- performance data at the LEA level for States selected for a comprehensive program review.

In addition to the elements used for the data dashboard, the Federal EHCY program office also analyzes data on key performance outcome measures for youth experiencing homeless such as graduation rates, dropout and graduate numbers, and chronic absenteeism numbers and rates, as well as achievement as measured by State assessments. To emphasize the increasing role of performance management in the OSHS EHCY programs redesigned monitoring plan, the OSHS has created a new monitoring indicator centered solely on performance management and has revised other monitoring indicators to include more detailed questions for SEAs pertaining to data analyses.

III. Monitoring Categories and Indicators

To ensure a thorough review of a State's EHCY program, including statutory, regulatory, and performance requirements and expectations, the OSHS EHCY program's monitoring process is organized by categories and indicators. The categories are used to organize more specific indicators that focus on the OSHS' priorities for program implementation. Table 1 identifies the monitoring categories and indicators for the OSHS EHCY program.

Table. 1 The OSHS EHCY program monitoring categories and indicators

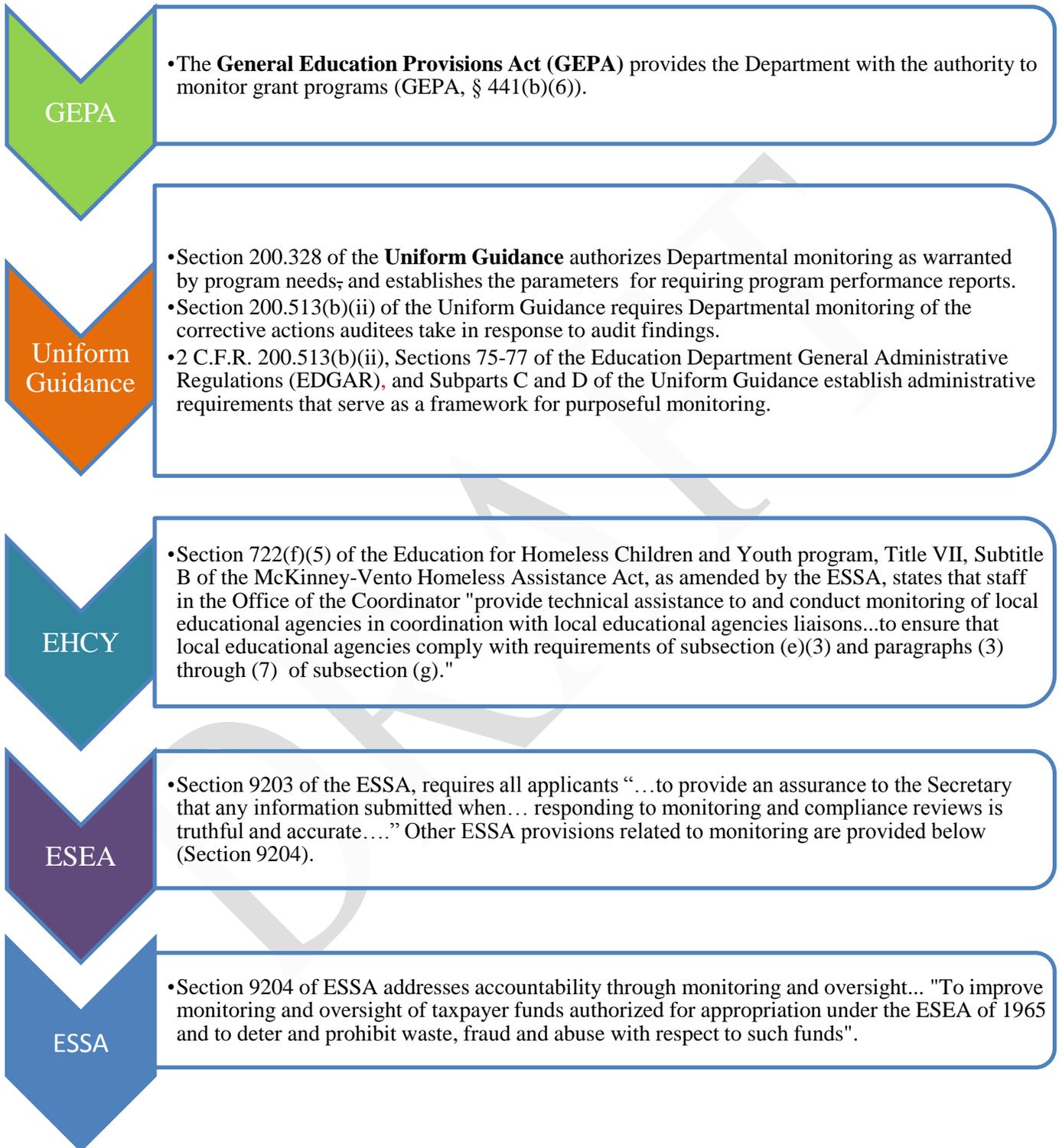
OSHS' EHCY Program Monitoring Categories and Indicators		
Categories	Indicators	Indicator Description
SEA Monitoring and Evaluation	SEA Monitoring	The SEA conducts monitoring of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements.
	SEA and LEA Performance Management	The SEA assesses the data quality and annual performance of homeless students in LEAs with and without subgrants.
SEA Program Support	Policy and Coordination (includes dispute resolution process)	The SEA implements procedures to address the identification, enrollment and retention of homeless students through coordinating and collaborating with other program offices and State.
	Professional Development and Technical Assistance	The SEA provides, or provides for, TA to LEAs to ensure appropriate implementation of the statute.
SEA Fiscal Oversight	LEA Subgrant Oversight	The SEA ensures that LEA subgrant plans for services to eligible homeless students meet all requirements.
	SEA Set-Aside Oversight	The SEA complies with the statutory and other regulatory requirements governing the reservation of funds for State-level coordination activities.
	Title I, Part A LEA Homeless Set-Aside	The SEA ensures that the LEA complies with providing comparable Title I, Part A services to homeless students attending non-Title I and Title I schools.

IV. Monitoring Authority

Monitoring is the regular and systematic examination of a State's administration and implementation of a Federal education grant, contract, or cooperative agreement. The Department monitors programs under the general administrative authority of its Organization Act, and State and sub-state grantee monitoring is required by the Office of Management and Budget's new Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at 2 C.F.R. § 200.328.¹ Figure 1 identifies the Department's monitoring authority.

¹ The Uniform Guidance applies to grant awards made on or after July 1, 2015.

Figure 1. The Department's Monitoring Authority



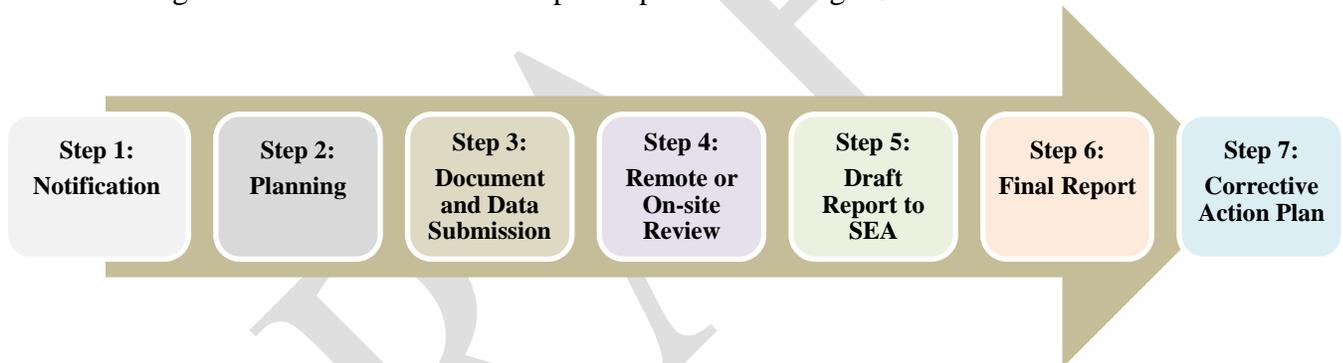
An ESSA amendment to the EHCY program requires that the SEA’s Office of the State Coordinator conduct monitoring of LEAs, both with and without EHCY subgrants, to review and evaluate individual programs to determine compliance, as well as to improve performance for children and youth experiencing homelessness.

V. Monitoring Process

During a SEA’s EHCY program review, a team of OSHS staff will conduct either a remote or on-site review of a SEA’s EHCY program. Both types of reviews include a desk review of requested documentation and available performance data prior to the remote or on-site interviews. Each OSHS monitoring team will include one lead, who will be the main contact with the State, and one or more additional OSHS staff persons who will assist in document and data reviews as well as LEA and SEA interviews.

The OSHS monitoring of State’s EHCY programs will follow a seven step process, as depicted in Figure 2.

Figure 2. The OSHS’ Seven Step Comprehensive Program Review Process



Step 1: Notification

- a. Approximately three to four months before the review, OSHS staff will call the State Coordinator to inform them that their State has been selected for monitoring and to discuss and confirm the time of the review as well as whether the review will be conducted remotely or on-site.
- b. A formal letter of notification for a program review will be sent from the OSHS Director to the Chief State School Officer and others in the SEA including the State Coordinator. The letter will identify the monitoring indicators that will be used to review the program.

Step 2: Planning

- a. After the formal notification letter is sent, the OSHS monitoring team and the State Coordinator will develop a plan (see Appendix A) for the review, including, but not limited to:
 - i. the data and documents that the OSHS requests for its review and the timetable for its submission by the State Coordinator;
 - ii. selection of the LEAs to be interviewed (informed by performance data analysis);
 - iii. identification of individuals from the SEA and LEAs to be interviewed; and

- iv. the schedule and agenda for each day of the review.
- b. In FY 2018, OSHS staff will pilot a group conference call that is open to all LEA liaisons and statewide stakeholder organizations that are focused on homeless families, children, youth and/or education, whether the review is on-site or remote. We will ask the State Coordinator to help invite participants and invite SEA staff to listen. OSHS staff will facilitate the calls and take notes. While the questions asked may vary by State, all will be asked about EHCY State plan implementation and shown the latest EHCY performance data and invited to comment.
- c. The OSHS will send an email verifying all aspects of the review plan to the SEA and State Coordinator.
- d. After OSHS and the State Coordinator confirm the review plan, OSHS and the State Coordinator will schedule a joint teleconference or webinar with the State Coordinator, and appropriate SEA and LEA staff in order to confirm the information discussed in Step 2.a, and:
 - i. provide responses to questions that the any participants may have about the monitoring process; and
 - ii. share information about TA support, which is available from NCHE at: <http://center.serve.org/nche/downloads/sc/hb/d.pdf>.

Step 3: Document and Data Submission

- a. At least one to two months before the remote or on-site review, the SEA will submit to the OSHS the requested data and documentation identified in the review plan.
- b. The OSHS monitoring team will analyze documents and data submitted by the SEA.
- c. The OSHS, the State Coordinator, and other SEA staff will discuss OSHS' analysis of the documents and data submitted in order to identify issues that merit further exploration during the review.

Step 4: Remote or On-Site Review

- a. During the remote or on-site review, the OSHS monitoring team may hold an entrance conference with the State Coordinator and other officials from the SEA.
- b. During the entrance conference, the OSHS monitoring team will:
 - a. share what the team has learned leading up to the on-site or remote review;
 - b. review the itinerary including who the team will interview at the SEA and LEAs; and
 - c. share the topics that the team will address during the week.
- c. Over a span of 1-3 days, the OSHS team will conduct individual or panel interviews with:
 - a. SEA staff members including:
 - i. grant fiscal management staff;
 - ii. managers of the office in which the EHCY program is situated;
 - iii. Title I, Part A staff; and
 - iv. any other SEA staff connected to the EHCY program.
 - b. LEA local liaisons
- d. At the end of the remote or on-site review, the OSHS monitoring team will hold an exit conference with the State Coordinator and other officials from the SEA in order to:
 - a. provide an overview of what the team did and who was interviewed;

- b. share what the team observed and learned; and
- c. explain next steps in OSHS program review.

Step 5: Draft Report to SEA

- a. After the remote or on-site review, the OSHS monitoring team and staff will continue to review data and documentation.
- b. Ideally within 40 business days after the exit conference, the OSHS monitoring team and staff will send a draft monitoring report to the SEA program contacts and managers.
 - i. SEA program contacts and managers will have the opportunity to correct draft language in any observations or inaccurate information of the State’s EHCY program, or resolve any findings, within 30 business days (recommendations do not need to be responded to but OSHS monitoring team will note SEA actions taken in response to any recommendations in its monitoring file for the State).
- c. The SEA will send their response to the draft monitoring report to the OSHS Director David Esquith, as well as send a scanned copy of the response electronically to the EHCY program Federal Coordinator John McLaughlin and OSHS monitoring team lead.

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- d. Within 30 business days after the SEA submits their responses to the draft monitoring report, the OSHS monitoring team and staff will review the SEA’s responses and develop a final monitoring report; any resolved findings by the SEA will be removed from the final monitoring report.
- e. The OSHS Director will send a letter to the State Coordinator and management and any additional leadership the SEA wishes to include outlining any modifications made to the final report. If there are any unresolved compliance issues still remaining, this letter will provide guidance to the SEA for the development of a corrective action plan (CAP).

Step 6: Final Report Posted to ED.gov

- a. After both the OSHS monitoring team and staff and the SEA program contacts and managers have had a chance to respond and make updates to the draft monitoring report and/or CAP, the OSHS Director will send a final monitoring report and/or CAP to the SEA.
- b. The OSHS monitoring team will upload the SEAs final monitoring report to the EHCY program’s website for public review.
- c. Unless a SEA has a CAP, the OSHS Director and monitoring staff will conclude the monitoring process with a closing letter to the Chief State School Officer and Director of the SEA program office in which the EHCY Office of the State Coordinator is situated.

Step 7: Corrective Action Plan

- a. States that are required to submit a CAP to resolve outstanding monitoring findings have 30 business days to finalize a plan to submit to OSHS. The OSHS staff then will have up to 30 business days to review the plan and work with the SEA to have it approved by the OSHS.
- b. Depending on the nature of the finding to be resolved, an approved CAP may take several months to approximately one year to complete and submit a final report with evidence of the required actions taken. In the latter case, an interim progress report may be required at approximately six months before the final deadline.
- c. Once the final CAP report and documentation are reviewed and approved, OSHS will send a closeout letter to the SEA. If the report is not approved within 30 business days of the submission deadline, the OSHS may initiate the process within the Office of Elementary and Secondary Education and the Department to place a condition on the next grant award. Such a condition typically requires quarterly progress reporting by the Chief State School Officer until the finding is resolved.

VI. Monitoring Instruments

The various protocols used by the OSHS during State EHCY program reviews have been redesigned to streamline the monitoring process for SEAs and LEAs when selected by the Federal EHCY program office for a review. The revised instruments have been aligned with the FY 17 and 18 categories and indicators to assist State EHCY programs in evaluating their performance, policies, and procedures. Additionally, Appendix B provides SEAs with a list by category and indicator of relevant NCHE TA products that highlight good national practices or expectations for administering programs to support children and youth experiencing homelessness.

The instruments designed for SEAs and LEAs during monitoring include:

- The State Educational Agency Education for Homeless Children and Youth Program Self-assessment Instrument (self-assessment) Form A and B is the monitoring instrument the OSHS will use to determine a States compliance with Federal statutory and regulatory requirements applicable to the Federal EHCY program. SEAs responses to the questions within the self-assessment, as well as submission of applicable documentation, will inform the questions asked by the OSHS monitoring team during a SEAs remote or on-site interview.
- The *LEA Interview Protocol* (see Appendix C) includes guiding questions that the OSHS' monitoring team may ask local liaisons during a scheduled LEA interview for the purpose of understanding the how the SEA is carrying out its LEA oversight responsibilities.

VII. Appendices

APPENDIX A

_____ EHCY Program Monitoring Plan

OSHS/EHCY Representatives: _____ Date: _____

OSHS/EHCY Representatives: _____

Document and Data Submission	Evidence	Timeframe
State Educational Agency	SEA-Self Assessment	

LEA Selection

Subgrantee	Non-subgrantee
1.	1.
2.	2.

Interview Personnel: Remote / On-site

State Educational Agency	Location	Local Educational Agency	Location
1.		1.	
2.		2.	
3.		3.	
4.		4.	
5.		5.	

Monitoring Schedule

	Timeframe	Comments
Notification Letter		
Teleconference/Webinar		
SEA Document and Data Submission		
_____ Review		
Entrance Conference		
SEA Interviews		
LEA Subgrantee Interviews		
Exit Conference		

Agenda: Remote / On-site

Agenda: Remote / On-site	Comments

APPENDIX B

Recommended NCHE Resources by Indicator

As we orient our program reviews to becoming a collaboration with SEAs through our monitoring and technical assistance (TA) to improve homeless student outcomes and statewide program performance, we would like to recommend the most directly relevant NCHE TA products for you to be familiar with by indicator. It is not required or expected that you read in detail all of these documents prior to a Department program review, but being familiar with them can help you to understand good practices around the country for meeting or exceeding expectations.

We will assume, however, that all State Coordinators are familiar with NCHE's State Coordinators' Handbook (<https://nche.ed.gov/pr/sc-hb.php>) which has chapters that focus on topics addressed by particular indicators. We also list those sections by the appropriate indicators below. Also, please note that the Department's non-regulatory guidance for the EHCY program includes sections of frequently asked questions that pertain directly to some indicators listed below. For example, Section M addresses coordination with the Title I, Part A program including some questions about the LEA homeless set-aside.

Category I: SEA Monitoring and Evaluation

Indicator 1.1: SEA Monitoring

State Coordinators' Handbook:

[Section H. State Monitoring of Local Educational Agency McKinney-Vento Programs](#)

[Section K. Preparing for Federal Monitoring of the State Education for Homeless Children and Youth Program](#)

[Appendix K-1. Tips for Preparing for EHCY Monitoring](#)

Indicator 1.2: SEA and LEA Performance Management

State Coordinators' Handbook:

[Section D. Data Collection and Reporting for ED Facts](#)

[Section E. Using Data for Decision Making](#)

[Getting to Graduation: Tools for Using Data to Support Student Success](#)

[Annual Plan for SEA Activities](#)

Category 2: SEA Program Support

Indicator 2.1: Policy and Coordination

State Coordinators' Handbook:

[Section B. Charting the Course: How do State Coordinators Plan and Fulfill Their Responsibilities](#)

[Appendix B-3 Steps for Revising State Code, Policies, or Procedures](#)

[Section G. Dispute Resolution](#)

NCHE Practice Briefs:

<https://nche.ed.gov/pr/briefs.php>

The list of briefs is nearly fifty and growing; no State Coordinator would be expected to know every one of them in detail. They all address important policy and coordination topics that can also serve as material for professional development and TA that the SEA offers LEA staff especially as they gain more experience identifying and serving students experiencing homelessness.

Indicator 2.2: Professional Development and Technical Assistance

State Coordinators' Handbook:

[Section C. Connections to Collaboration](#)

[Section F. Technical Assistance for Local Educational Agencies](#)

[NCHE Recorded Webinars and Tutorials](#)

Category 3: SEA Fiscal Oversight

Indicator 3.1: LEA Subgrant Oversight

State Coordinators' Handbook:

[Section I. The McKinney-Vento Subgrant Process](#)

[Appendix I-1. McKinney-Vento Subgrants Authorized Activities](#)

[Appendix I-2. Sample Timeline for the McKinney-Vento Subgrant Process](#)

[Section J. Management and Fiscal Oversight of Education for Homeless Children and Youth Program Grants](#)

[Appendix J-1. Guiding Questions for Use of Subgrant Funds](#)

General subgrant resources:

https://nche.ed.gov/ibt/sc_subgrants.php

Indicator 3.2: SEA Set-Aside Oversight

State Coordinators' Handbook:

[Section A. Introduction](#)

[Appendix A-1. State Coordinator Preassessment](#)

[Section B. Charting the Course: How do State Coordinators Plan and Fulfill Their Responsibilities?](#)

Indicator 3.3: Title I, Part A LEA Homeless Set-Aside

Resources by Topic:

https://nche.ed.gov/ibt/sc_titlei.php

APPENDIX C

**Education for Homeless Children and Youth
Sample Local Education Agency Interview Protocol**

Local Educational Agency:

Date:

State Abbreviation:

EHCY Subgrant Award Number:

SEA Monitoring and Evaluation	1.1 SEA Monitoring	1.1.1	a). Has the LEA been monitored by the SEA within the past year? If “No”, provide the date last monitored by the SEA. b) How often is the LEA monitored? c) Does the SEA follow a schedule when monitoring? d) Describe the SEA’s process in notifying and preparing the LEA when a monitoring event (remote or on-site) is scheduled?
		1.1.2	What information has the LEA received from the SEA about its monitoring requirements for the McKinney-Vento program?
		1.1.3	Describe the monitoring process by the SEA. What information (e.g., documentation, data, procedures) does the SEA request during an on-site or remote monitoring?
	1.2 SEA and LEA Performance Management	1.2.1	How does the SEA inform the LEA about data collection responsibilities and ensure complete, accurate and timely reports?
		1.2.2	a) How does the LEA ensure that homeless students are included in statewide assessments? b) What percentage of students identified as homeless by an LEA at the time of the state assessments participated in all of the ones administered for their grade-level?
		1.2.3	a) Has the LEA submitted data to the CSPR from the most recent school year? If “No”, explain why the data were not submitted to the SEA. b) Does the LEA know the achievement gap between homeless students and other economically disadvantaged youth? c) Does the LEA use their homeless student achievement data to compare two years, essentially creating a baseline, to determine achievement improvements?
		1.2.4	a) What emphasis does the LEA place on student academic outcomes (e.g., proficiency on State assessments or graduation rates)? b) How are homeless students in your LEA performing on statewide assessments compared to housed students?
		1.2.5	a) What is the percentage of homeless students chronically absent compared to the overall rate of students chronically absent in the LEA? b) What is the percentage of homeless students who participated in extracurricular activities (clubs, sports, competitions) compared to the rate of extracurricular participation of all students in the LEA? c) What is the percentage of homeless students who graduated from high school compared to the rate for all students who graduated from high school in the LEA?

SEA Program Support	2.1 Policy and Coordination (includes dispute resolution process)	2.1.1	Since the State submitted its State Plan in 2017, have you received any information on reviewed, revised, and developed policies, or issued policy or memoranda, to ensure removal of barriers for homeless students? If “Yes”, describe what information you have received.
		2.1.2	a) How does the State Coordinator ensure that local liaisons are aware of the State’s dispute resolution policy? b) How does the State Coordinator ensure that the LEA has adopted or adapted the policy?
		2.1.3	Does the LEA track pre-dispute inquiries concerning barriers to enrollment?
		2.1.4	a) How many enrollment disputes have occurred in the LEA’s district in the past two years? b) Is the LEA required to report disputes to the SEA?
		2.1.5	a) What documentation does the LEA use when a parent or youth contacts them about enrollment problems, even when the LEA is able to have students enrolled immediately? b) Does the LEA maintain a log of contacts and/or inquiries?
		2.1.6	Who makes the final decision on school or district-level enrollment disputes?
		2.1.7	Are students immediately enrolled in the district and provided transportation during a dispute resolution process? If “No”, explain why transportation is not provided during a dispute resolution.
		2.1.8	Does the LEA conduct independent surveys of community groups to determine if parents/youths are receiving their rights regarding school enrollment and enrollment disputes?
		2.1.9	How often and by what means does the State collect information from the LEA to determine the ongoing needs of homeless students in the State?
		2.1.10	Describe the LEA’s community outreach and collaboration activities for homeless families and youth.
		2.1.11	Describe the LEA’s outreach activities to identify unaccompanied youth and preschool aged children.
		2.1.12	Describe how the LEA coordinates with the Title I, Part A program to ensure that homeless students receive comparable services and that their educationally-related needs are met in both schools with schoolwide programs and those with targeted assistance programs.
	Professional Development and Technical Assistance	2.2.1	a) What professional development activities has the State Coordinator provided to relevant LEA staff about the requirements of McKinney-Vento within the past year? b) How has the professional development improved the LEA’s capacity to support homeless children and youths?
		2.2.2	What other professional development activities has the LEA participated in that were sponsored by the SEA or funded by the LEA related to McKinney-Vento?
		2.2.3	a) What technical assistance has the State provided to the LEA to ensure community agencies such as shelters, motels, soup kitchens, libraries, and runaways/unaccompanied youth programs are made aware of the rights of homeless students? b) How often is this information updated? c) Is there a link on the SEA website for the LEA to access this information?
		2.2.4	How has the SEA assisted the local liaison with learning their responsibilities for implementing McKinney-Vento requirements?
		2.2.5	How (and how often) does the LEA inform places where homeless families may go (e.g., shelters, motels, campgrounds) about the educational rights of homeless students?
		2.2.6	What agencies do the LEA coordinate information with (e.g., coalitions, food pantries)?
		2.2.7	a) How does the LEA ensure enrollment in the school of origin, is feasible, and in the best interest of the child, and transportation, when requested? b) Does the LEA keep track of whether homeless students remain in their school of origin and provide this information to the SEA (e.g., reported as numbers or raw percentages)?
		2.2.8	How does the LEA ensure that homeless students are enrolled and assisted with basic school requirements (e.g., records transfer, health and immunization records, and residency)?

SEA Fiscal Oversight (ONLY COMPLETE IF EHCY SUBGRANTEE)	3.1 LEA Subgrant Oversight	3.1.1	Have you received any technical assistance from the SEA on the use of subgrant funds?
		3.1.2	What are the steps the State takes to organize a subgrant competition?
		3.1.3	a) Has the State provided subgrant information and application reviews in a timely manner? b) What was the subgrant notification process? c) When were subgrant funds available? d) Is there carryover allowed?
		3.1.4	What is the SEA’s policy regarding carryover and reallocation of funds?
		3.1.5	How does the SEA review grants for quality of application as well as local need?
		3.1.6	a) How does the SEA ensure subgrant funds are awarded in a timely manner and available throughout the grant period? b) Has there been a delay of more than three months in the award of subgrant funds by the SEA? c) If there was a delay of more than three months, why was that? d) If you have a multi-year subgrant, has the State provided information about the use of carryover funds to continue the program at the start of the next fiscal year?
		3.1.7	a) If an LEA has a subgrant, what emphasis does the LEA place on student outcomes as part of the subgrant application? b) How often does the LEA submit program evaluations to the SEA? c) Describe how the data sent to the SEA is used for the annual performance report?
		3.1.8	When making subgrants, what process does the SEA use to verify that LEA subgrant amounts are correct and in compliance with each program’s requirements?
		3.1.9	Does the LEA describe how it will use the subgrant funds to leverage resources, including by maximizing nonsubgrant funding for the position of the liaison and the provision of transportation?
		3.1.10	Does the LEA describe in their subgrant application how they will use Title I, Part A set-asides to serve homeless students?
		3.1.11	Is the LEA currently following what they put in their subgrant application to serve homeless children and youth? If “No”, explain what the LEA has changed to better support homeless children and youth.
		3.1.12	a) Does the LEA create an annual workplan to improve program performance and outcomes for homeless students? b) Does the LEA have at least one annual goal with a baseline measure using these data or other data available to the SEA?
		3.1.13	What internal fiscal controls does the LEA have in place to account for the use of funds in a way that meets Federal requirements?
		3.1.14	When does the LEA and subgrantees obligate funds during the period of availability (e.g., monitoring drawdowns, etc.)?
		3.1.15	a) How does the LEA ensure that procurement transactions are conducted in accordance with established State procurement procedures? b) What types of documentation does the LEA maintain to establish that all procurement requirements have been met for each transaction?
		3.1.16	a) If the LEA contracts with an outside entity for services, how does it monitor the use of those funds and evaluate the quality of service provided? b) What is the LEA’s process for establishing set-aside amounts?

SEA Fiscal Oversight	Title I, Part A LEA Set-Aside	3.3.1	How does the SEA assist LEAs in determining the amount of Title I, Part A funds to reserve for homeless students?
		3.3.2	a) What process does the LEA use to reserve funds? b) Is the reservation amount and budget amendment request process coordinated with both the liaison and with the Title I office?
		3.3.3	What is the SEA's process for review and approval of LEA Title I, Part A applications?
		3.3.4	How does the SEA then check whether LEA set-asides were used and comparable services and other educationally related support services were provided?
		3.3.5	If the number of homeless students enrolled in the LEA changes significantly over the course of a school year, how is the LEA set-aside adjusted?
		3.3.6	How does the LEA assess the sufficiency and effectiveness of its set-aside amount and activities for addressing the educational needs of students experiencing homelessness?

DRAFT