STATE MONITORING & RISK ASSESSMENT
EDUCATION FOR HOMELESS CHILDREN AND YOUTH (EHCY) PROGRAM

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U.S. DEPARTMENT OF EDUCATION (DEPARTMENT)

Introductions

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AGENDA

- Introduction to EHCY Monitoring

- The Performance Management Pilot Monitoring Protocol

- Common Findings, Recommendations and Commendations

- Tool for Assessing Grantee Risk (TAGR)

- Next Steps

INTRODUCTION

- Monitoring the use of Federal funds is an essential function of the Department.

- While some States receive onsite visits, the Department also monitors through desk reviews, which could include video or teleconferencing.

- Since FY 2011, the EHCY program, along with other programs have conducted a risk assessment process for targeting monitoring and technical assistance.

PERFORMANCE MANAGEMENT PILOT

FY 2015 -18

- In August 2014, the Government Accountability Office (GAO) recommended that the Department improve oversight of the EHCY program through more regular monitoring of State Educational Agencies (SEA) and Local Educational Agencies (LEA).

- In response, the Department revised its monitoring protocol. The main changes included:
  - The development of a more comprehensive performance risk assessment of SEAs; and
  - A greater focus on using LEA-level performance data to select LEA subgrantees for interview.

PERFORMANCE MANAGEMENT PILOT

CONTINUED

- In FY 2017 a new performance management indicator was added.
    - The new indicator, 1.2, includes requirements for data quality review, data analysis, and use of program data at the SEA and LEA subgrantee-levels to set baseline goals and annual targets.

- SEAs have the opportunity to resolve compliance findings during the 30 business day technical review period. If the finding can be resolved in this time period, the finding is removed from the final report.

- 6 SEAs were monitored in this pilot; 18 have been monitored since FY 15.

MONITORING RESULTS

COMPLIANCE FINDINGS

- Five compliance findings were made during the pilot.

- Those findings fell into two categories:

- Indicator 1.1

  – The SEA conducts monitoring of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements.

- Indicator 3.3

  – 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.

MONITORING RESULTS

- 15 SEAs received recommendations for improvement.

- Recommendations fell into four areas:

- Indicator 1.2

  – The SEA assesses the data quality and annual performance of homeless students in LEAs with and without subgrants.

    - Create workplans with measurable goals
    - Analyze EHCY performance data

- Indicator 2.2

  – The SEA provides, or provides for, professional development and technical assistance to LEAs to ensure appropriate implementation of the statute.

    - Track new liaison training
    - Increase the amount of statewide professional development

MONITORING RESULTS

RECOMMENDATIONS (CONT.)

- Indicator 3.1
  - The SEA ensures that LEA subgrant plans for services to eligible homeless students meet all requirements.
    - Provide technical assistance to subgrantee LEAs on evaluating performance
    - Award grants on time
    - Ensure that grant competition includes multiple reviewers

- Indicator 3.3
  - The SEA ensures that the LEAs comply with providing comparable Title I, Part A services to homeless students attending non-Title I and Title I Schools.
    - Lack of systematic coordination between EHCY and Title I, Part A at SEA level resulting in missing or inconsistent set-asides.
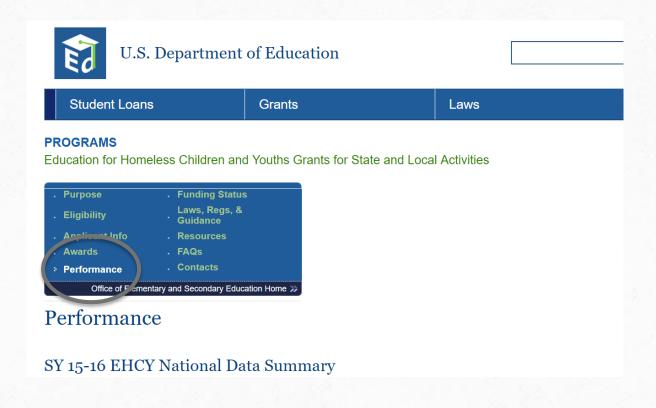
MONITORING RESULTS

EMERGING PRACTICES

- Under the performance management pilot, the Department began to include commendations of promising emerging practices observed at the LEA or SEA level.

- To be commended in a monitoring report, it must be judged that the practice could be replicated by EHCY programs in other SEAs.

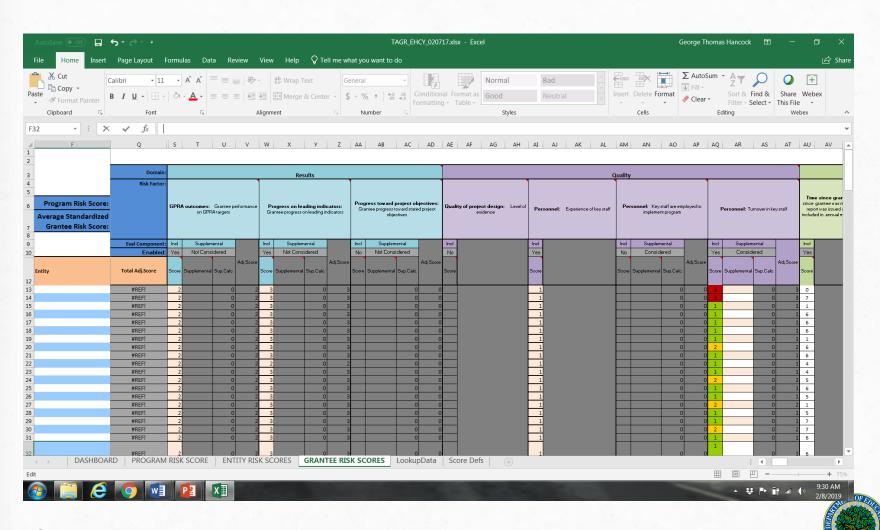- 26 emerging practices were identified across 17 monitored SEAs.

MONITORING REPORTS

DEPARTMENT EHCY MONITORING REPORTS ARE AVAILABLE ONLINE

https://www2.ed.gov/programs/homeless/performance.html

TOOL FOR ASSESSING GRANTEE RISK (TAGR)

DOMAINS: RESULTS, QUALITY, COMPLIANCE, FINANCIAL

TOOL FOR ASSESSING GRANTEE RISK (TAGR)

COLUMN HEADINGS FOR: RESULTS

- GPRA outcomes: Grantee performance on GPRA targets

- Progress on leading indicators: Grantee progress on leading indicators

- Progress toward project objectives: Grantee progress toward stated project objectives

TOOL FOR ASSESSING GRANTEE RISK (TAGR)

COLUMN HEADINGS FOR: QUALITY

- Quality of project design: Level of evidence
- Personnel: Experience of key staff
- Personnel: Key staff are employed to implement program
- Personnel: Turnover in key staff

TOOL FOR ASSESSING GRANTEE RISK (TAGR)

COLUMN HEADINGS FOR: COMPLIANCE

- Time since grantee monitoring: Time since grantee was monitored (any action where report was issued and/or monitoring actions included in annual monitoring plan/performance review)

- Monitoring findings: Findings related to integrity issues (i.e., the nature of the findings)

- Monitoring findings: Number of monitoring findings

- Grant conditions: Number of grant conditions (unique to the grantee)

- Data quality: Data quality score (based on program officer review of data)

- Risk data completeness: Grantee failed to submit required information or information requested by the program office

TOOL FOR ASSESSING GRANTEE RISK (TAGR)

COLUMN HEADINGS FOR: FINANCIAL

- Drawdowns: Deviation from the expected pattern of drawdowns

- Size of Award: Dollar value of award

- Sub-grantees: Number of sub-awards or sub-grantees

- Budget: Budget quality

- Grantee internal control measures: Sustained audit findings

NEXT STEPS

FY 2019 AND BEYOND

REMINDER: EVERY STUDENT SUCCEEDS ACT REQUIREMENTS FOR SEA WEBSITES

- Since October 2016, SEAs must post an updated local liaison directory for all LEAs on its website
  - ED/NCHE checks this annually in the Fall and notifies States not posting or updating their directories
- SEAs must also post the latest available homeless student enrollment total on its website
  - SEAs cannot just link to the NCHE State page or CSPR PDF on ed.gov
  - ED releases State totals on ED Data Express usually every summer (July-September) for previous reporting year

EHCY PART OF ESSA FEDERAL COMPLAINT PROCEDURE

- Complaints related to requirements in the McKinney-Vento Act are now included because section 8304(c)(3)(C) of the ESEA, as amended by ESSA, requires each State to adopt procedures to receive and resolve complaints alleging violations of law in the administration of the programs included the State's consolidated State plan

- SEAs and LEAs should have their own complaint procedures that parents, guardians or youth go through first before the complaint comes to the U.S. Department of Education

QUESTIONS?

THANK YOU!

U.S. DEPARTMENT OF EDUCATION
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