

Continuous Improvement and Compliance Monitoring

How to Use Data to Drive Supports

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Consolidated Program Review and Rural Education



Washington Office of Superintendent of
PUBLIC INSTRUCTION

About Me

- 14 years in state government (Legislature and OSPI)
- 5 years as Methods of Administration Coordinator and CTE program supervisor
- 7 years as Consolidated Program Review team lead
- 4 kids in public school, grades 3-8





Vision

All students prepared for post-secondary pathways, careers, and civic engagement.

Mission

Transform K–12 education to a system that is centered on closing opportunity gaps and is characterized by high expectations for all students and educators. We achieve this by developing equity-based policies and supports that empower educators, families, and communities.

Values

- Ensuring Equity
- Collaboration and Service
- Achieving Excellence through Continuous Improvement
- Focus on the Whole Child



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Equity Statement

Each student, family, and community possesses strengths and cultural knowledge that benefits their peers, educators, and schools.

Ensuring educational equity:

- Goes beyond equality; it requires education leaders to examine the ways current policies and practices result in disparate outcomes for our students of color, students living in poverty, students receiving special education and English Learner services, students who identify as LGBTQ+, and highly mobile student populations.
- Requires education leaders to develop an understanding of historical contexts; engage students, families, and community representatives as partners in decision-making; and actively dismantle systemic barriers, replacing them with policies and practices that ensure all students have access to the instruction and support they need to succeed in our schools.



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About Washington

- 295 school districts (LEAs)
- charter schools
- tribal compact schools
- 9 ESDs
- 1,149,000 students served
 - 27k homeless students
 - 515k low-income students
 - 133k English learners



About this Presentation

- Purpose and intent of compliance monitoring.
- Washington's monitoring process and data analysis.
- Process of continuous improvement cycles.





Compliance Monitoring in Washington

Purpose and Authority

Each SEA grant recipient is responsible for monitoring LEA activities for *reasonable assurance* regarding grant funds and to ensure state and federal awards are administered in compliance with grant and program requirements.

Our Consolidated Program Review (CPR) fulfills OSPI's compliance monitoring requirements under federal regulations (2 CFR 200) and elsewhere.



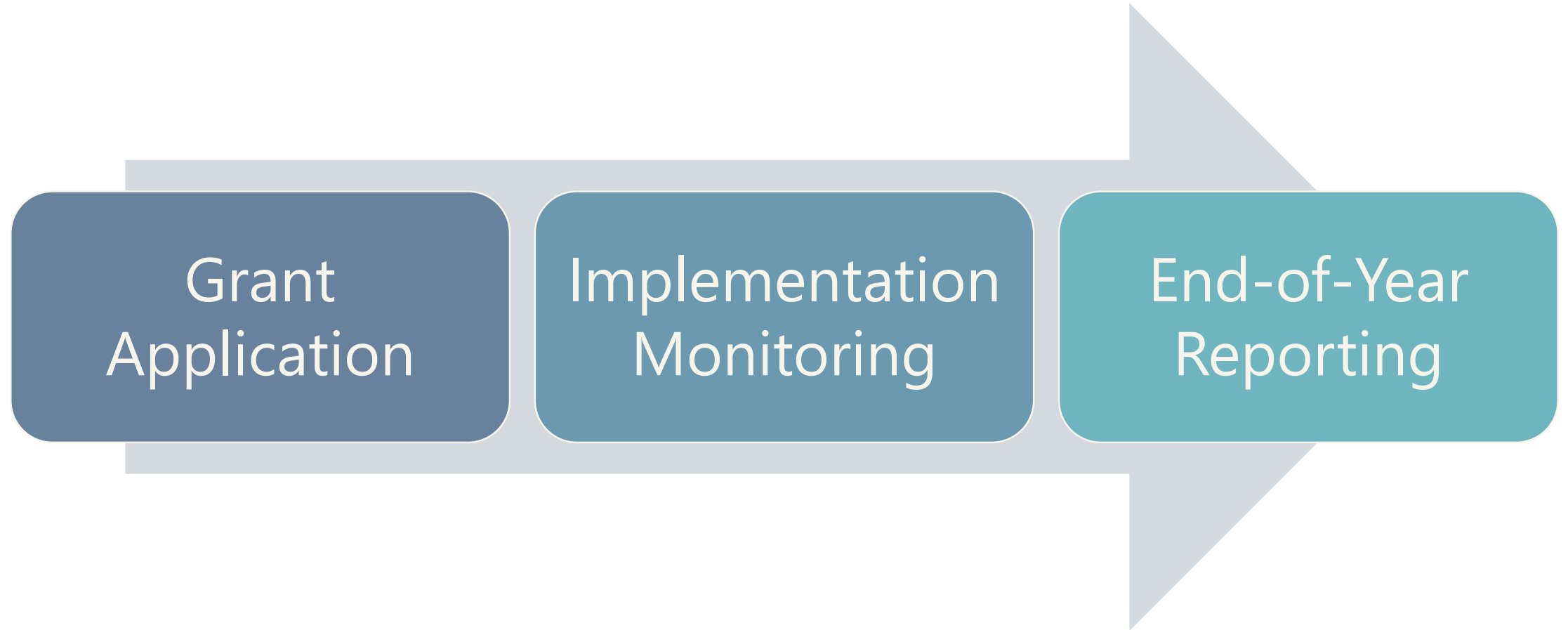
State authority derives from a number of RCWs and WACs.

For example, Civil Rights monitoring authority comes in part from:

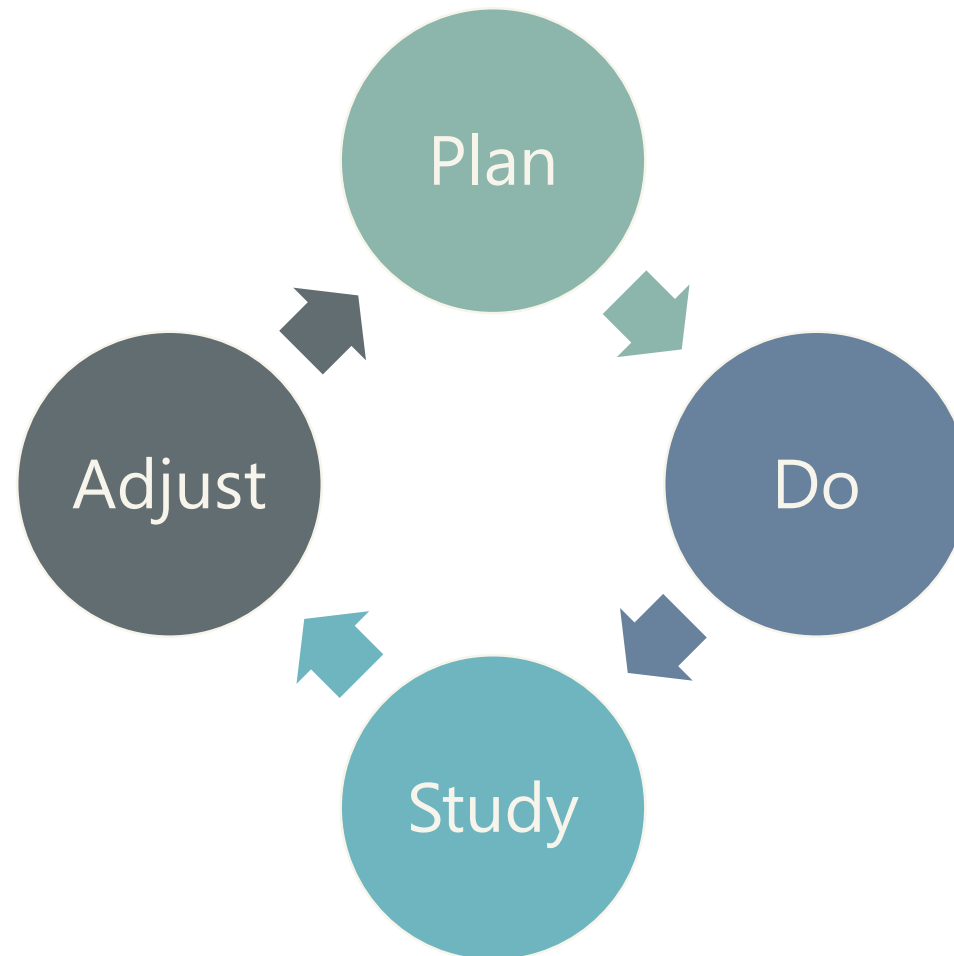
- WAC 392-190-007 – adopts guidance and regulation from Title II of ADA, IX, Sec. 504.
- WAC 392.190.080 – outlines authority from the chapter.
- OSPI Civil Rights Guidelines – authority from RCW 28A.640.020 and 642.020 for guidelines and regulations and 640.030 for monitoring.



Ongoing Compliance Monitoring



Improvement Cycle



Direction from US Dept. of Ed.

- Develop a **standardized process**.
- Design a system capable of **assessing a LEA's potential risk** for noncompliance.
- Establish a **monitoring cycle** that identifies and reviews potential "high risk" LEAs (EDGAR and 2 CFR 200).
- Establish **valid and reliable data** collection.

2 CFR 200 § 207, 331(b)-(h), 338

Plan



Selection Process

- Analyze *Annual Performance Data* for all LEAs and assess risk.
- Select up to 10 LEAs with the highest performance data cell results or emergent concerns and programmatic risk.
- Determine LEAs for desk or on-site review from ESD review cycle.
- Add the four largest LEAs (by federal funds).
- Add any new LEAs (e.g., State-Tribal Compact schools or charter schools).



Data Elements

- LEA Size
- OSSI – Comprehensive or Targeted Support Identification
- Bilingual – EL Proficiency Rates, 5-year EL Transition Rate, and Dually Identified EL/SPED Rate
- Special Education – IDEA Determinations



More Data Elements

- Career and Technical Education (CTE) – State Allocated Funds and Perkins Performance Improvement Plan (PPIP) Indicators
- Graduation Rate
- Fiscal – Federal Funds Allocated by Programs under CPR per FTE
- Audit Finance and Grant Administration – Risk Audit Ranking
- Title I, Part A – Math and ELA Low-Income 4th Grade SBAC Scores



Goals

- Assist LEAs in understanding how federal and state programs may be used to address LEA goals to improve student achievement, reduce K-12 dropouts, and support students meeting graduation requirements.
- Improve LEAs' CPR experience.
- Build supports for small, rural school districts.



Consolidated Program Review

Through a combination of desk reviews of documentation and on-site reviews of implementation, we monitor:

- Multiple federally funded programs under the Elementary and Secondary Education Act (ESEA).
- Various federal requirements and protections.
- Parallel state programs and requirements.

More than 40 monitors representing 19 different program offices and areas of compliance participate.

Do

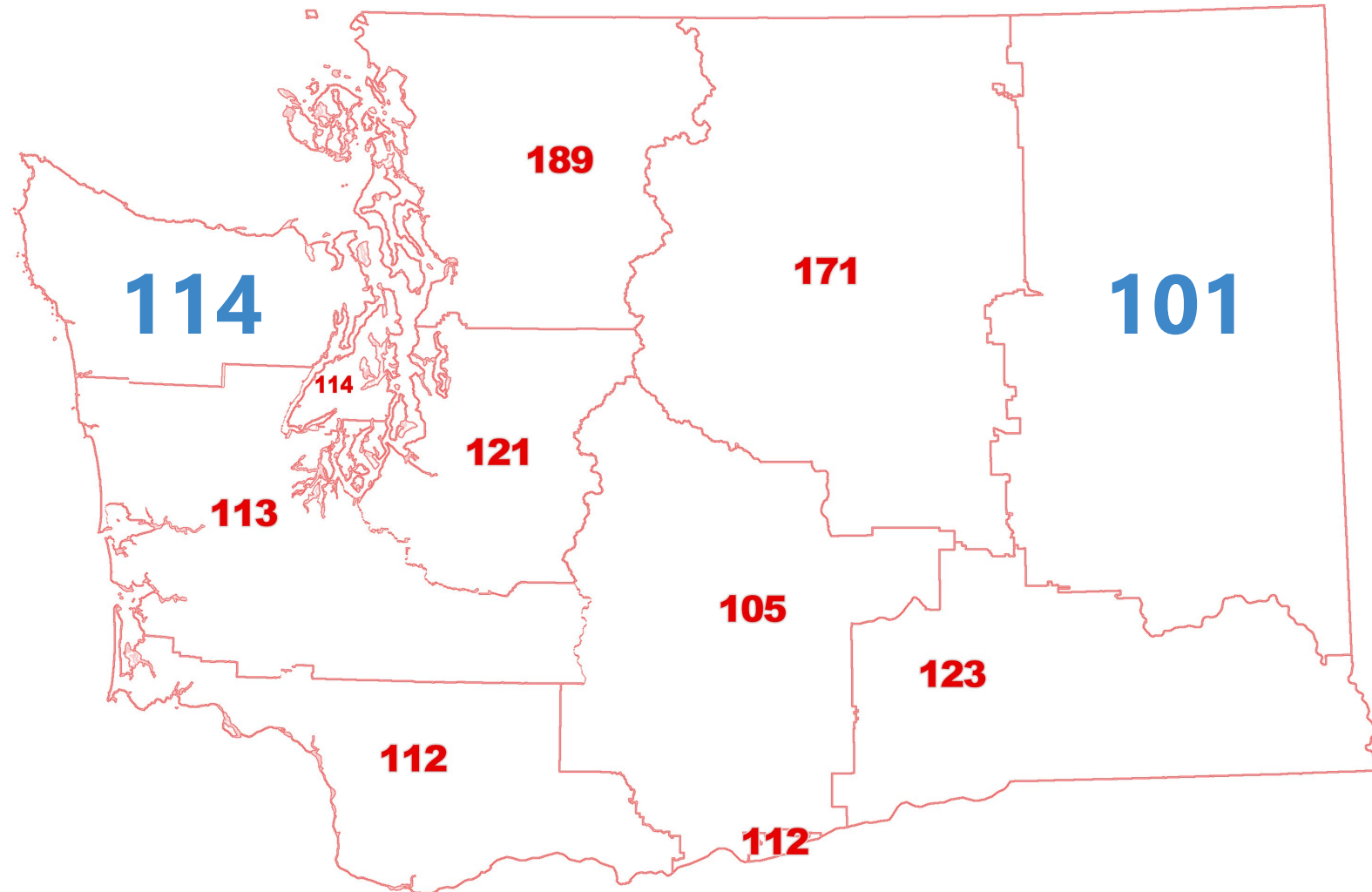


Scope

1. Title I, A
2. LAP (Learning Assistance Program)
3. Title I, C – Migrant Ed
4. Title I, D – Neglected and Delinquent
5. Test Fee Reduction programs
6. Title II, A – Teacher and Principal Quality
7. Title III / TBIP (Transitional Bilingual Instructional Program)
8. Gun-Free Schools Act
9. Title V, B – Rural Education
10. Title IX – McKinney-Vento (Homeless)
11. Highly Capable
12. Perkins / CTE
13. Private Schools
14. Civil Rights
15. Fiscal
16. Office of System and School Improvement
17. Foster Care
18. Title IV, A – Student Support and Academic Enrichment
19. Tribal Consultation



Multi-year Cycle and Annual Risk Assessment



Key Stakeholders

- LEAs
- State Auditor's Office (SAO)
- Federal Program Reviewers
- Public Records Requesters





Checklists (Exercise)

Checklist Structure

Item	Description	Evidence	Determination	Actions Required	Comments
1.1	Ranking and Allocating <i>Title I, Part A funds are used for eligible attendance areas and follow the ranking and allocation rules. [ESSA Section 1113(a)(b)]</i> <i>Resources:</i> Ranking & Allocating Title I, Part A Funds	LEA Level <input type="checkbox"/> A. Title I, Part A expenditure report for <i>each</i> Title school served, showing only Title I expenditures for the 2018–19 school year. There should be a separate report submitted for EACH Title-served school. The reports must show:	<input type="checkbox"/> Compliant <input type="checkbox"/> Action Plan Approved <input type="checkbox"/> Evidence Needed <input type="checkbox"/> Noncompliant <input type="checkbox"/> N/A <input type="checkbox"/> N/A – Limited		

Determinations

- ☐ Compliant
- ☐ Action Plan Approved
- ☐ Evidence Needed
- ☐ Noncompliant
- ☐ N/A
- ☐ N/A - Limited

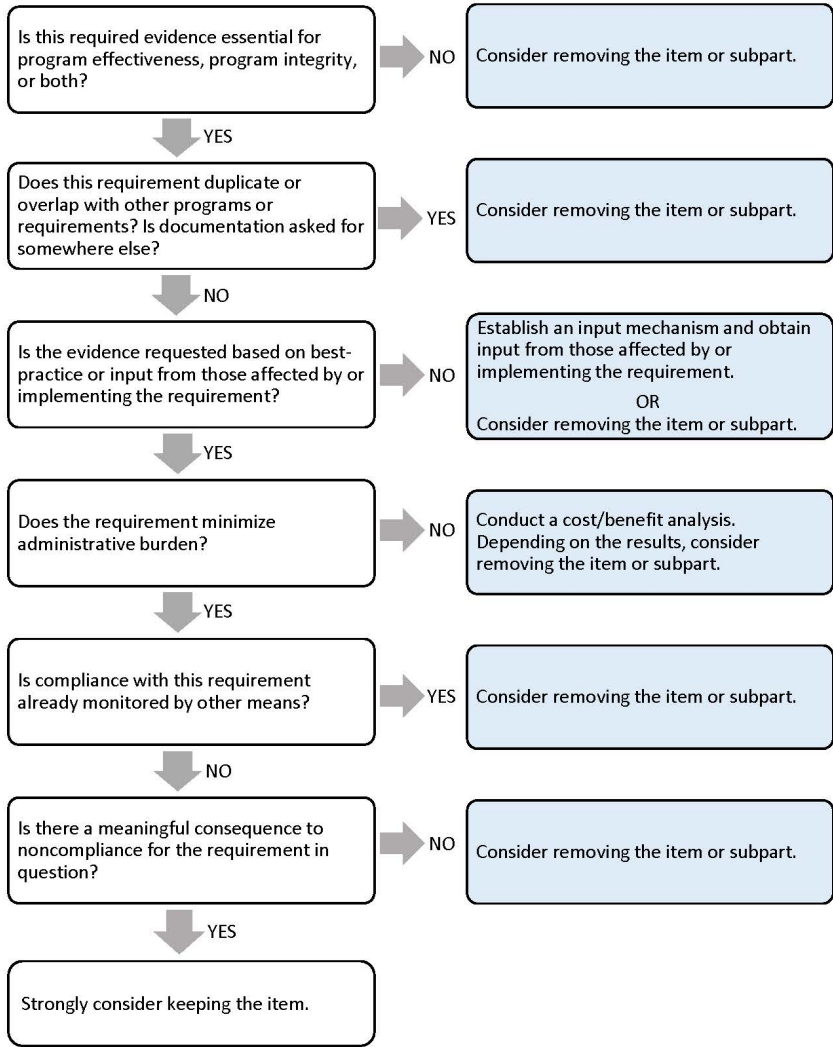


Documentation for Review

- Even a relatively small review can have 300-600 documents, not to mention added comments and emails external to the review system. Some LEAs upload more than 1,500 files for review by the time the CPR is closed.
- Multiply this by between 65 and 95 reviews in a given year.



Decision Tree for Checklist Building



Title I, Part A Set-Asides

(6) the services the local educational agency will provide homeless children and youths, including services provided with funds reserved under section 1113(c)(3)(A), to support the enrollment, attendance, and success of homeless children and youths, in coordination with the services the local educational agency is providing under the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11301 et seq.);

Sec. 1112



(3) RESERVATION OF FUNDS.—

(A) IN GENERAL.—A local educational agency shall reserve such funds as are necessary under this part, determined in accordance with subparagraphs (B) and (C), to provide services comparable to those provided to children in schools funded under this part to serve—

(i) homeless children and youths, including providing educationally related support services to children in shelters and other locations where children may live;

Sec. 1113



(C) HOMELESS CHILDREN AND YOUTHS.—Funds reserved under subparagraph (A)(i) may be—

- (i) determined based on a needs assessment of homeless children and youths in the local educational agency, taking into consideration the number and needs of homeless children and youths in the local educational agency, and which needs assessment may be the same needs assessment as conducted under section 723(b)(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11433(b)(1)); and
- (ii) used to provide homeless children and youths with services not ordinarily provided to other students under this part, including providing—



(I) funding for the liaison designated pursuant to section 722(g)(1)(J)(ii) of such Act (42 U.S.C. 11432(g)(1)(J)(ii)); and
(II) transportation pursuant to section 722(g)(1)(J)(iii) of such Act (42 U.S.C. 11432(g)(1)(J)(iii)).

Sec. 1113



Fill In the Blank

Item	Description	Evidence
1.1	Title I, Part A Set-Asides ...	LEA Level <input type="checkbox"/> A. <input type="checkbox"/> B. <input type="checkbox"/> C.





Data Analysis

Process Improvement

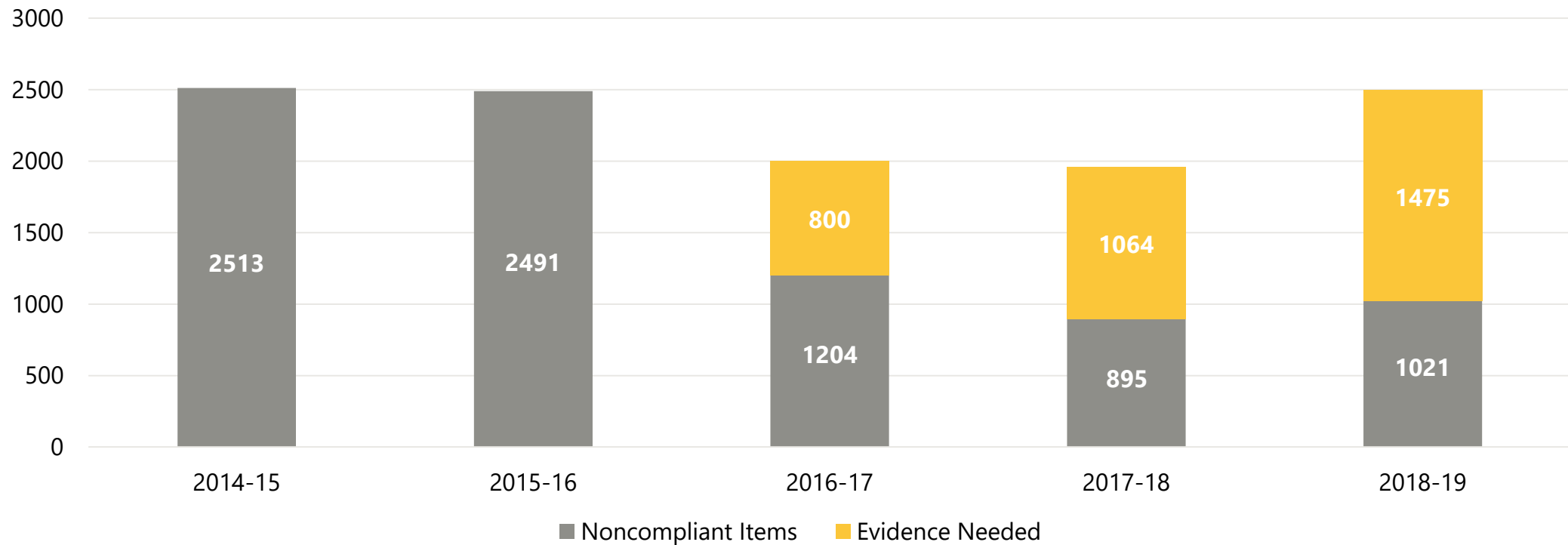
June every year we review data from the monitoring cycle just concluded to see where we should direct improvement efforts.

In this, we are modeling the same work we want to see LEA programs conduct with their program evaluation efforts.

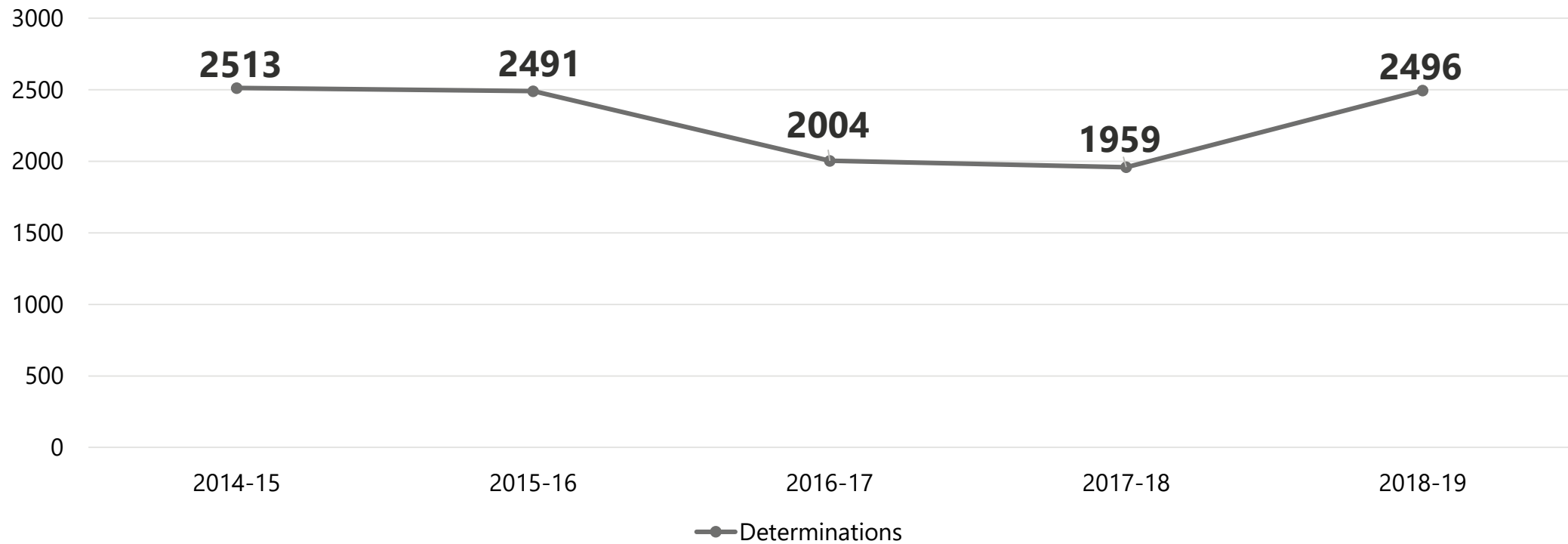


Study

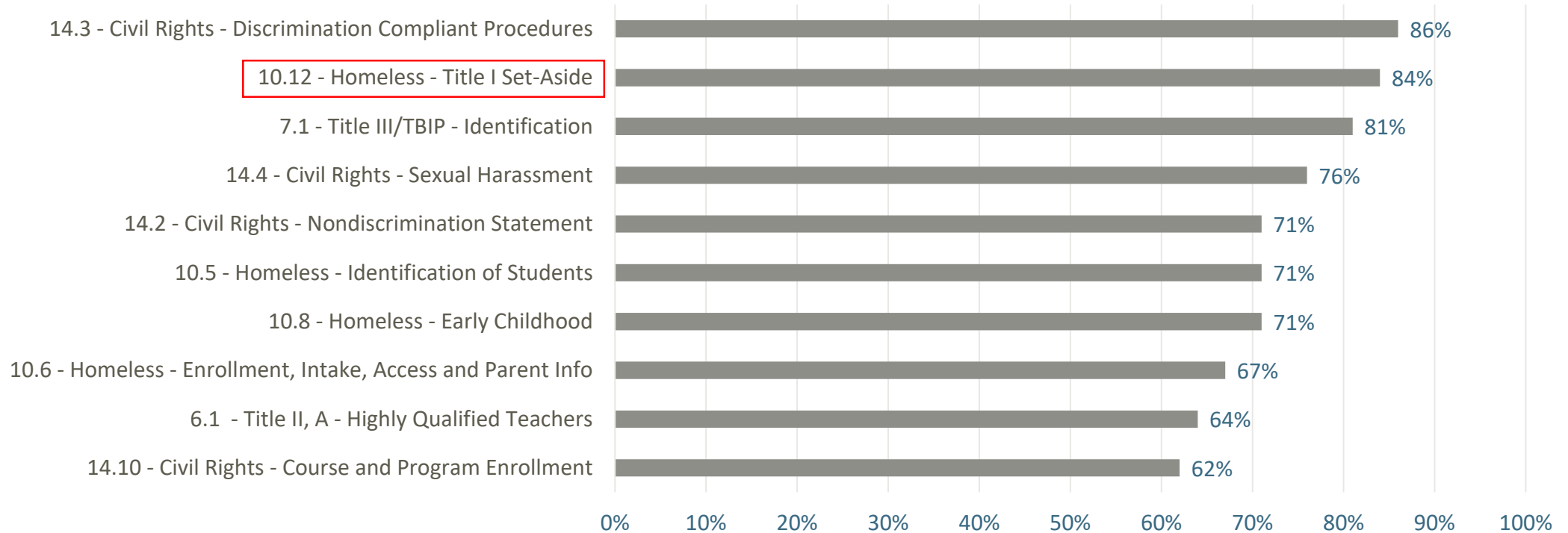
Noncompliant and Evidence Needed



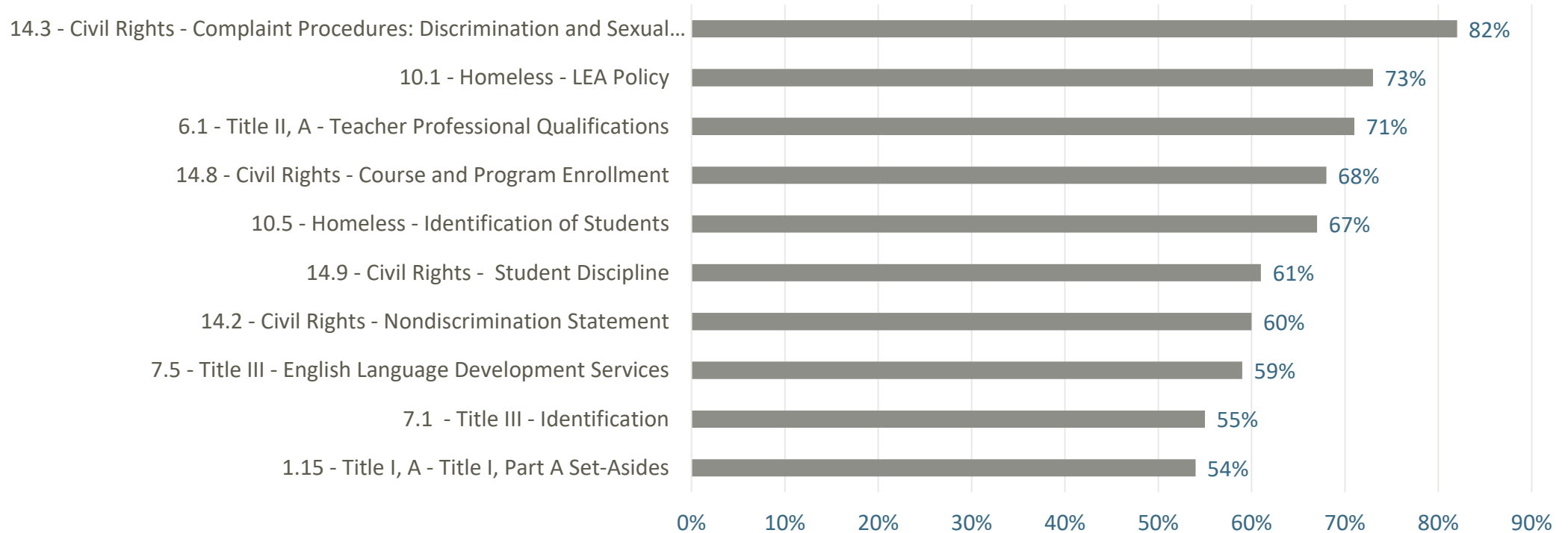
Determination Totals



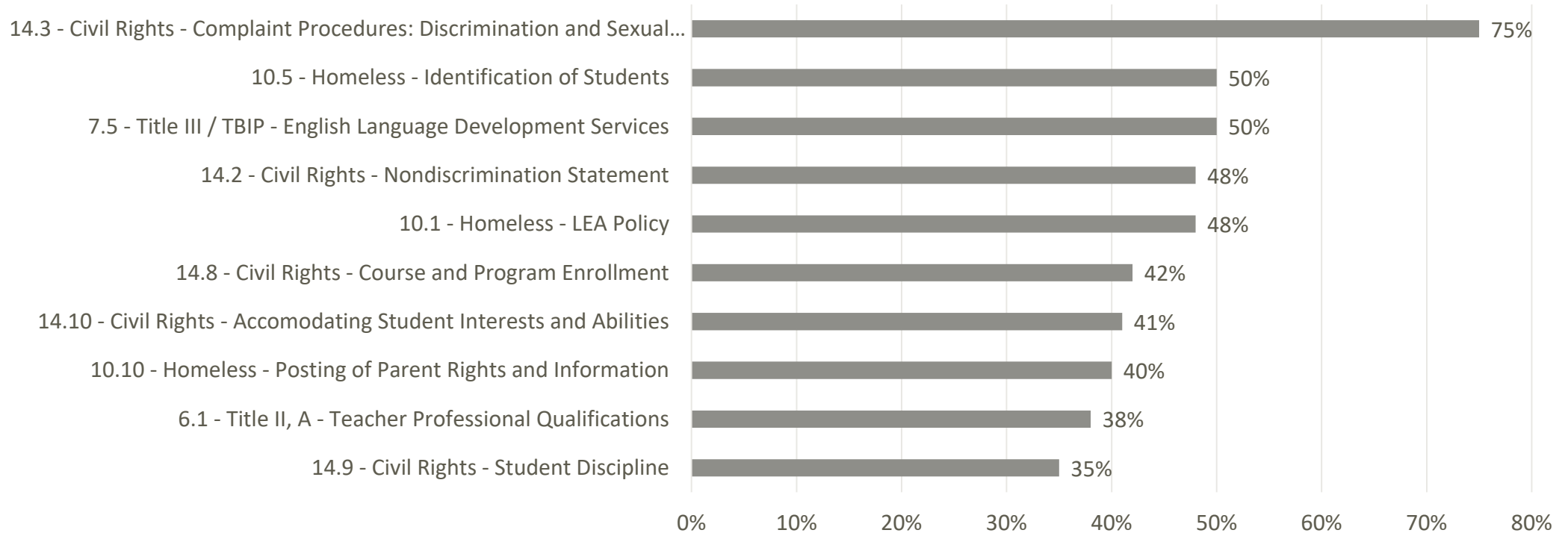
Top Ten Noncompliant Items 2015-16



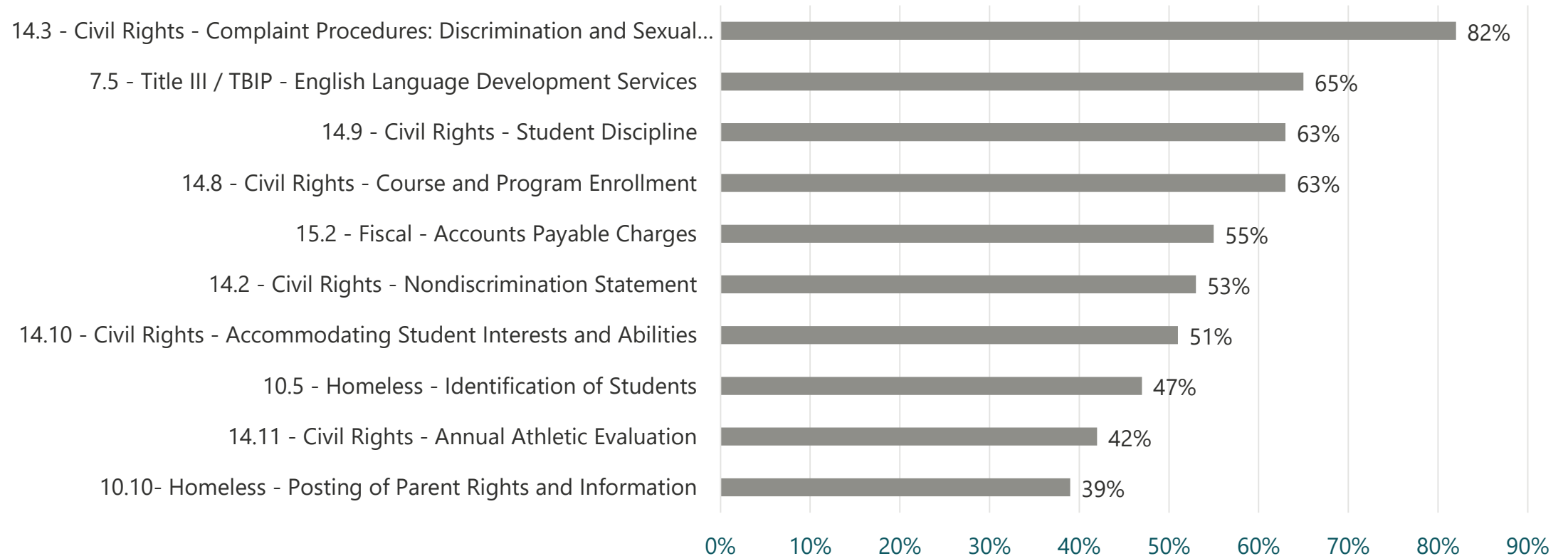
Top Ten Noncompliant Items 2016-17



Top Ten Noncompliant Items 2017-18



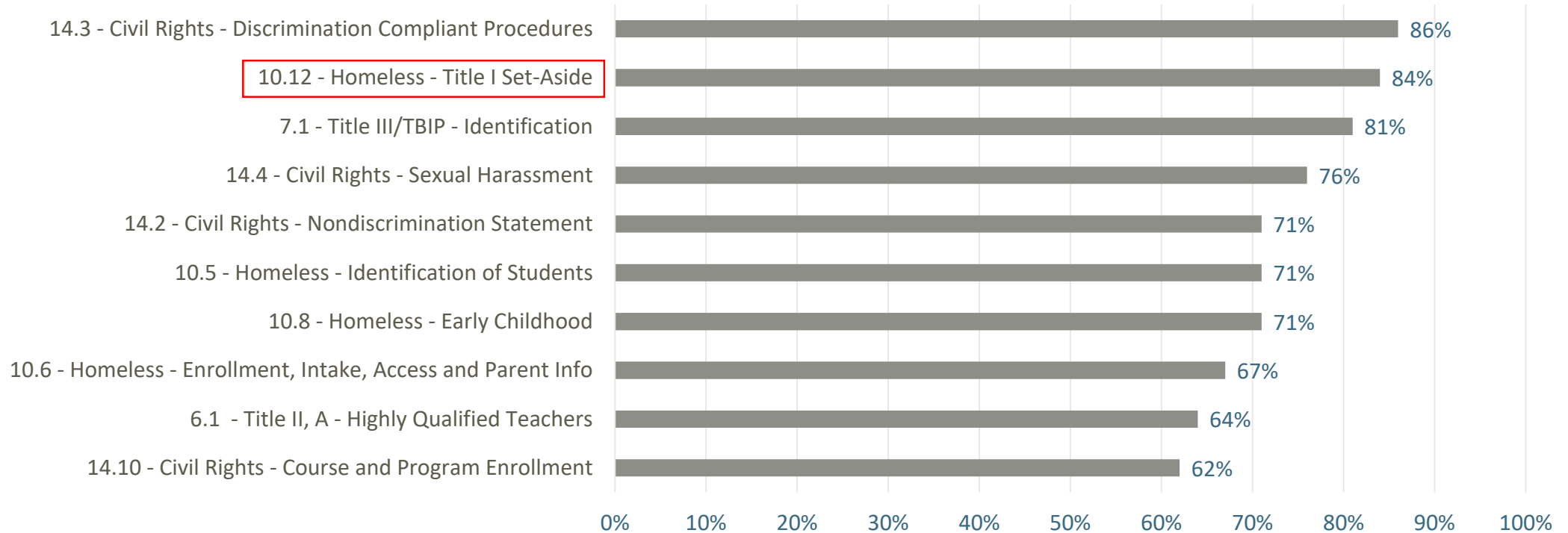
Top Ten Noncompliant Items 2018-19



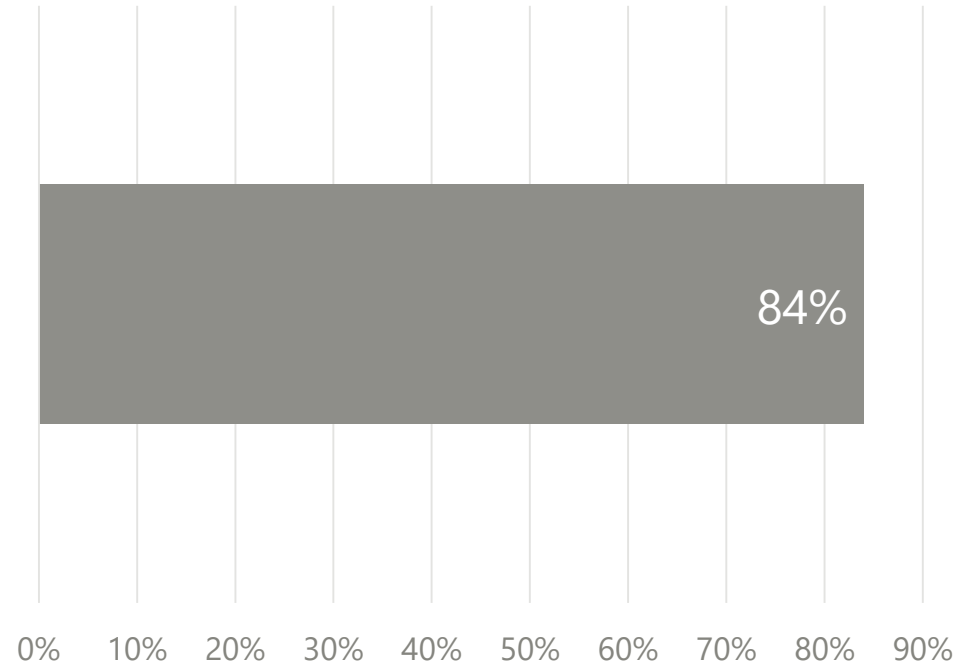


Data Stories and Improvement Cycles

Top Ten Noncompliant Items 2015-16



10.12 - Homeless - Title I Set-Aside



Adjust



10.12 (2015-16)

Title I Set-Aside

The district has set-aside Title I, Part A funds in an amount necessary to serve homeless students in non-Title I schools and/or shelters and other locations where homeless children and youth may live. U.S.C. 6313 (c)(3)(A).

District Level

- ☐ A. Dollar amount of set-aside.
- ☐ B. Evidence of a needs assessment or other written documentation of how the set-aside amount was determined.
- ☐ C. Evidence that the set-aside amount is sufficient to meet the unique needs of identified homeless students.
- ☐ D. Provide description/ documentation explaining how Title I set-aside dollars for homeless students are spent.
- ☐ E. If funds other than Title I are used to support the needs of homeless students, show evidence of the *sources and amounts of these funds*.

*Note: Schoolwide programs may indicate zero dollars set aside, only if they can show clear collaboration between Title I and McKinney-Vento programs, and show evidence that all homeless student needs are met through other resources. **Must be able to show that zero is an appropriate amount to serve the educational needs of homeless students in the district.** Evidence may include written documentation, needs assessments, fiscal expenditure report, etc.*



Adjust

We took several steps to help reduce this area of noncompliance:

1. Title I and Homeless (MV) staff got together to discuss requirements and concerns.
2. We revised the Title I needs assessment in our grant application to more clearly call out the MV requirement.
3. Staff collaborated on look-fors for the needs assessment.
4. Districts were trained on the updated application.
5. The compliance monitoring in the MV section of the review is supplemented in the Title I section.



1.2 (2019-20)

Title I, Part A Set-Asides

Charges to federal grants are charged and documented appropriately. [2 C.F.R. Part 200 Subpart E – Cost Principles]

- *Parent Engagement (1%, if over \$500,000 allocation).
[Section 1116(a)(3)]*
- *Private schools (if applicable).
[Section 1117(a)(4)]*
- *Neglected & Delinquent students.
[Section 1113 & Section 1115]*
- *Homeless students.
[Section 1113 & Section 1115]*

Resources:

[*Title I, Part A & LAP Program Guide*](#)

See page 37

[*Title I, Part A: A Fiscal Handbook*](#)

See page 10

LEA and Building Level

Expenditure report (or other internal tracking document), separated by category/set-aside, for each of the following required set-asides.

The report must show the budgeted amounts, as well as the total 2018–19 expenditures for each set-aside. In addition, include a document, or LEA chart of accounts, with account coding for Title I, Part A set-asides and locations.

- ☐ A. Homeless students (*required for all LEAs*).
- ☐ B. Parent Engagement (1%, if allocation over \$500,000).
- ☐ C. Evidence that unspent 2018–19 LEA and/or school Parent Engagement set-aside (required for LEAs with an allocation of \$500,000 or more) was carried forward and added to 2019–20 (current year) budget for Parent Engagement.
- ☐ D. Private schools (if applicable).
- ☐ E. Neglected & Delinquent students (if applicable).

Examples:

- [Homeless Set-Aside](#)
- [Parent Engagement Set-Aside Example 1](#)
- [Parent Engagement Set-Aside Example 2](#)
- [Private School Set-Aside](#)



10.11 (2019-20)

Title I Set-Aside

The LEA has set-aside Title I, Part A funds in an amount necessary to serve homeless students in non-Title I schools and/or shelters and other locations where homeless children and youth may live. U.S.C. 6313 (c)(3)(A)

LEA Level

For initial review of Item 10.11 A-D, OSPI staff will review LEA's McKinney-Vento Set-Aside Needs Assessment submitted with the 2019–20 iGrant 201-Title I, Part A Annual Plan. OSPI will request additional uploads if information provided in the needs assessment is insufficient evidence to determine compliance.

In lieu of submitting documentation for initial review, for this item please add a comment into the notes field "see iGrants needs assessment."

- ☐ A. Dollar amount of set-aside.
- ☐ B. Evidence that the set-aside amount is sufficient to meet the unique needs of identified homeless students.
- ☐ C. Provide description/ documentation explaining how Title I, Part A set-aside dollars for homeless students are spent.
- ☐ D. If funds other than Title I, Part A are used to support the needs of homeless students, show evidence of the *sources and amounts of these funds*.

Results

From 2015-16 to 2016-17, noncompliance dropped from 84% to 54%. In 2018-19 it was down to 10%.

Compliance has improved immensely since we integrated the needs assessment into the Title I application.

In the past, the only LEAs undertaking a needs assessment were the (handful) of McKinney-Vento competitive grant applicants every 2-3 years.



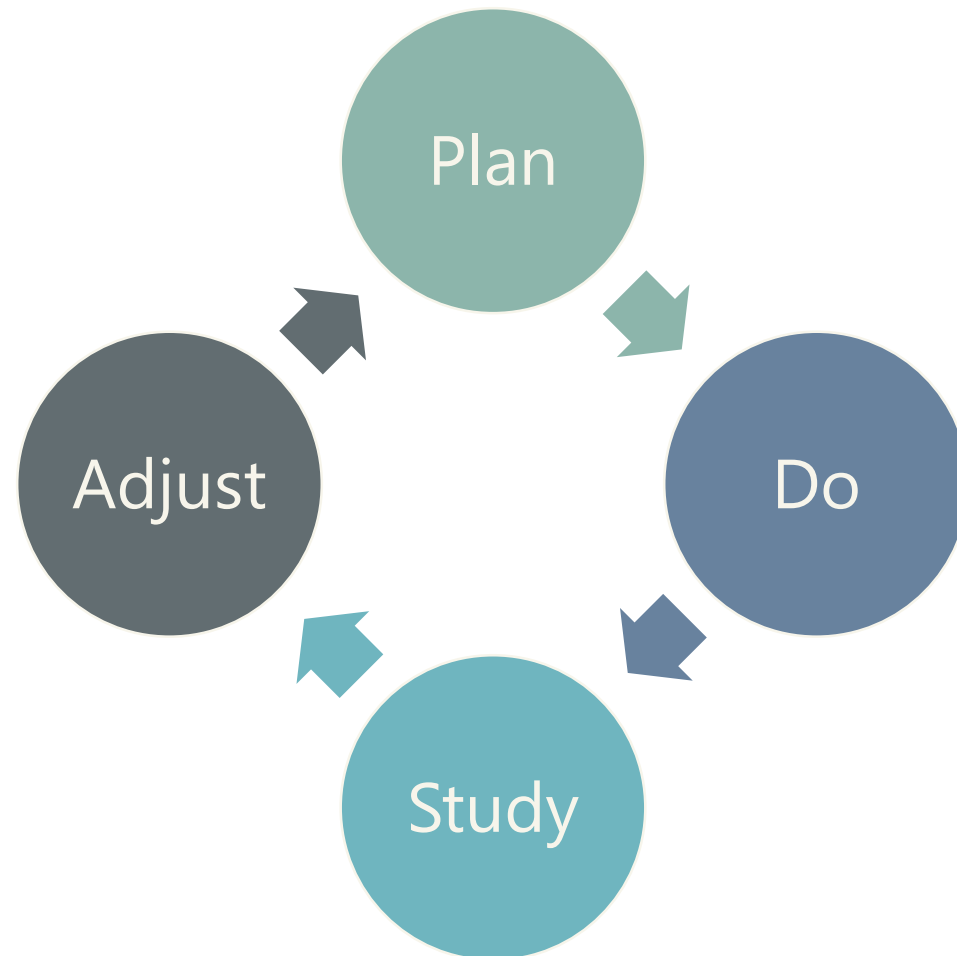
Continuous Improvement

This has paved the way for some great conversations between OSPI and LEAs, and more importantly, between McKinney-Vento liaisons and Title I directors at the local level.

We continue to analyze the results: the impact with LEAs and the process success at our agency.



Improvement Cycle





Takeaways

- Compliance monitoring is an ongoing process.
- Continuous improvement takes honest analysis and intentional collaboration.



Contact Us!

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