
Monitoring of Title I, Part D, Subpart 1 Neglected and Delinquent for Department of Corrections Institutions

School Year: 2020-21
—Guidance Document—



A. Legislation

The Prevention and Intervention programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk, authorized by Title I, Part D of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act of 2015 includes state and local programs.

State

Subpart 1 establishes the state agency Neglected or Delinquent (N or D) program to enable State Education Agencies (SEA) to award sub grants to State Agencies (SA) that operate educational programs for children and youth in institutions or community day programs for children who are neglected, delinquent or at-risk, and for children and youth in adult correctional facilities. Subpart 1 state-operated adult correctional institutions must have state-funded education programs in which students are enrolled 15 hours a week to be eligible to receive funding for Title I, Part D, supplementary programs. Subpart 1 state-operated juvenile correctional institutions must have state-funded educational programs in which students are enrolled 20 hours a week to be eligible to receive funding for Title I, Part D, supplementary programs.

Reports and Monitoring

A. Monitoring and Accountability

The Wisconsin Department of Public Instruction (DPI) will arrange for state monitoring visits with institutions administering Title I, Part D Subpart 1 and Subpart 2 programs, as required under the Every Student Succeeds Act (20 § U.S.C. 6434 (a)(2)(D)). On-site reviews ensure that federally-funded programs are operating in accordance with the approved application, and supplement the regular program of education for students.

B. Non-Compliance

Areas of non-compliance, revealed during monitoring visits, must be resolved within the prescribed time frame, which is usually 30 days.

C. Reports

Preliminary findings will be presented to institutions at the conclusion of the monitoring review. A formal written report will be sent to the institutions' fiscal agent within six weeks after the review. The formal report will include corrective action if necessary, recommendations, and an offer for technical assistance, if needed.

Title I, Part D – Neglected & Delinquent

REQUIREMENT: Title I-D programs are required to provide evidence of the students submitted for the Title I-D Annual Count.

Section 1412

Required Documentation:

1. **Copies of dated records of students reported for the annual count that include (all required):**
 - educational need (the student has not completed high school);
 - student age; and
 - class enrollment (ensuring the students have met the required number of hours).

Guiding Questions:

- What is the process for determining and confirming the annual count?

REQUIREMENT: The institution evaluates its Title I-D program to determine the program’s impact on student academic achievement and transition to further educational programs, postsecondary education, or employment. The institution uses the results of the most recent evaluation to plan and improve the program.

Section 1431 (a), Section 1414(c)(6).

Required Documentation:

2. **A copy of the Title I-D program evaluation including:**
 - a disaggregation of student achievement data by gender, race, ethnicity, and age. Using the data, include the implications of the data on the program and student success; and
 - a description of how the institution uses data in order to maintain and improve educational achievement, operate and enhance transitional programs, and facilitate school credit accrual for the purpose of grade promotion, graduation, or an equivalent graduation program.

Guiding Questions:

- What process does the institution use to evaluate their Title I-D program?
- Who is involved in the Title I-D program evaluation?
- What steps has the institution planned or implemented to their Title I-D program based on learning from the evaluation?

REQUIREMENT: The institution ensures students receive the necessary Title I-D transition activities to encourage those students to return to school, post-secondary education, or employment.

Section 1418

Required Documentation:

3. Provide evidence of transition funding and programs that are intended to meet the required reservation amount.

Guiding Questions:

- What transitional supports are provided to Title I-D students?
- How are Title I-D students supported in their efforts back to secondary school, post-secondary education, employment, or community?
- How are Title I-D students supported as they enter and transfer into the facility with the ultimate goal of a successful transition after they exit the facility?

REQUIREMENT: The institution assesses the educational needs of children served under this subpart.

Section 1414(a)(1)

Required Documentation:

4. Provide examples of assessment procedures and placement protocols to ensure potentially eligible students are placed at facilities that can serve Title I-D students. To the extent practicable, provide evidence that such assessments are provided upon entry into a correctional institution to the extent practicable.

Guiding Questions:

- What progress monitoring assessments enlighten staff to student growth?
- What assessment data is used to inform and improve instruction and services?

REQUIREMENT: The institution provides priority of services to eligible children and youth who are likely to complete incarceration within a two-year period.

Section 1414(c)(2)

Required Documentation:

- 5.a. Evidence of prioritization in placement protocols.
- 5.b. Evidence of prioritization in the application of services to eligible students

REQUIREMENT: The institution encourages the Title I-D correctional facilities to coordinate with LEAs or alternative education programs attended by incarcerated children and youth prior to and after their

incarceration to ensure that student assessments and appropriate academic records are shared jointly between facilities.

Section 1414(c)(9) and (15)

Required Documentation:

- 6.a. Evidence of a protocol or policy for transferring documentation to LEAs.**
- 6.b. Evidence in transferring assessment or academic achievement information.**

Guiding Questions:

- How does the institution coordinate or collaborate with LEAs or alternative education programs?
- What are the records transfer processes for records to and from LEAs?

REQUIREMENT: The institution ensures supports to meet existing IEPs. The institution ensures notification of children and youth identified as in need of special education services who intend to return to the LEA.

Section 1414 (c)(15)

Required Documentation:

- 7.a. Evidence of IEP procedures.**
- 7.b. Evidence of transferring academic and IEP documents to their home LEA upon exit to said LEA.**

Guiding Questions:

- How does the institution identify the LEA a student with an IEP will be attending prior to their exit?
- How is the LEA notified of the student intending to enroll upon their exit from the institution?

REQUIREMENT: The institution ensures that licensed teachers and staff are trained to work with children and youth with disabilities and other students with special needs.

Section 1414(c)(17)

Required Documentation:

- 8.a Evidence of trainings for teachers and staff to meet the needs of students with disabilities.**
- 8.b A list of Title I-D funded staff that includes their license and assignment**

Guiding Questions:

- What professional learning have staff experienced to better support students with special needs?

Fiduciary Responsibility

REQUIREMENT: Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed.

These records must:

- be supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- be incorporated into the official records of the subrecipient;
- reasonably reflect the total activity for which the employee is compensated by the subrecipient;
- encompass both federally assisted and all other activities;
- comply with established accounting policies and practices of the subrecipient; and
- support the distribution of the employee's salary or wages.

Required Documentation:

9.a. Written description of the procedures used by the subrecipient to determine an individual's charges that are allowable and properly allocated to the Title I-D grant.

The written description should include the following:

- who determines whether an individual is eligible to be claimed on the grant,
- how it is determined that an individual is allowable to be claimed on the applicable Title grant (i.e. Uniform Grant Guidance, grant requirements, DPI technical assistance);
- how the distribution of the individual's time is determined;
- how work time is documented by the individual;
- how time worked is recorded into the payroll system;
- how compensation is allocated within the payroll system based on distribution of the individual's time worked;
- who prepares claims for the applicable Title grants;
- what the process is to verify the claim agrees to the actual compensation paid the individual;
- who reviews claims;
- who signs claims; and
- who files claims with DPI.

9.b. Sample supporting documentation for one employee identified in the budget filed with DPI for each applicable Title. The individual to be sampled will be determined by DPI.

Supporting documentation for the individual selected shall include the following:

- Payroll report for the individual selected from July 1 to current date. The payroll report should include the following. If it does not, attach the following information in addition to the payroll report:
 - dates of payroll;
 - compensation amount paid;
 - general ledger account coding;
 - total activity for which the employee is compensated, not exceeding 100% of compensated activities; and
 - documentation supporting the actual hours worked and how the compensation is allocated for any individual whose compensation is allocated among more than one activity or cost objective; more than one federal or federal and non-federal award; or more than one indirect or direct and indirect cost activity.

Guiding Questions:

- What documents (e.g., work schedule, class schedule, etc.) does the LEA use to support actual time worked?

REQUIREMENT: Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part under a federal award, are required until disposition takes place.

As a minimum, procedures will meet the following requirements:

- property records must be maintained;
 - a physical inventory of the property must be taken and the results reconciled with the property records at least once every two years;
 - a control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated;
 - adequate maintenance procedures must be developed to keep the property in good condition; and
 - if the subrecipient is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.
2. C.F.R. § 200.313(d).

10. a. Local policy on capitalization of equipment, including threshold used to determine when equipment is determined to be a capital item.

10. b. Property records that include (all are required):

- a description of the property;
- a serial number or other identification number;
- the source of funding for the property, including the Federal Award Identification Number (FAIN) found on the subaward received from DPI;
- who holds title;
- the acquisition date;
- the cost of the property and percentage of federal funds used for the property;
- the location of the property;
- use and condition of the property; and

- any disposition data, including the date of disposal and sale price of property.

10. c. Documentation that a physical inventory of the property is taken and the results are reconciled with property records at least once every two years:

- a description of how the inventory was taken;
- documentation reflecting a check-off of items listed in the property records or equivalent support that a physical inventory was taken; and
- date of the inventory and date of most recent prior inventory.

10. d. Evidence of the inventory maintained for recording pertinent information about equipment purchases, if any.

10. e. Written description of the procedures in place to prevent and investigate loss, damage, or theft to equipment or supplies.

10. f. Written description of the policy when selling property that has been purchased with Title funds.

Guiding Questions:

- What procedures are in place to ensure that new property, purchased with federal funds, is included in the state agency's property management system?
- How is the person responsible for property management made aware of new purchases?

REQUIREMENT: The institution uses Title I-D funds for programs and projects that meet the state and federal requirements. The institution complies with the supplement, not supplant requirements of 20 U.S.C. 6321 as they apply to Title I, Part D.

Section 1415(a) and (b)

Required Documentation:

- 11. Evidence the funds are supplementing the required number of hours of instruction from state and local resources.**