



ESEA Title I, Part D, Subpart 2 Neglected and Delinquent Monitoring

– Guidance for LEAs –



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Title I, Part D - Neglected & Delinquent

Introduction

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 (20 USC §6421 et seq.) include two programs; one for state programs and another for local programs. Title I, Part D, Subpart 2 and Subpart 3 outline the requirements for local programs:

- Title I, Part D, Subpart 2 authorizes the Department of Education (ED) to award grants to State Educational Agencies (SEAs) to enable them to award sub-grants to Local Educational Agencies (LEAs) that have youth who reside in locally operated correctional facilities. LEAs may provide programs that serve children and youth who are in locally operated correctional facilities, or are attending community day programs for delinquent children and youth. Additionally, Subpart 2 programs may provide assistance to children and youth who are victims of neglect or at risk of dropping out of school.
- Subpart 2 state-licensed childcare institutions, located within school district boundaries, must have locally-funded regular education programs in which students enroll 20 hours a week to be eligible to receive funding for Title I, Part D, supplementary programs. Adult institutions must have locally-funded education programs in which students enroll 15 hours a week to be eligible to receive funding for Title I, Part D, supplementary programs.
- Subpart 3 requires LEAs to evaluate their programs using multiple and appropriate evaluation measures at least once every three years to determine the programs' effects on student achievement.

Purpose

The Title I, Part D, Subpart 2 Grant was authorized by Congress to assist LEAs and agencies to address the academic and support needs of at-risk children and youth. It shares the same purpose as Title I, Part A, sets high standards for all students to achieve, provides academic support and related systems to these students, and ensures state standards are met. Subpart 2 also places emphasis on using grant funds to enable students to make successful transitions from institutions to further schooling or employment.

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The purpose of Subpart 2 is to support the operation of LEA programs that:

- improve educational services for children and youth in local institutions so that such children and youth have the opportunity to meet the same challenging State academic standards that all children in the State are expected to meet;
- provide such children and youth with the services needed to make a successful transition to further education or employment; and
- prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education and the involvement of their families and communities.

Monitoring Guidance

Monitoring reviews ensure federally funded programs are operating in accordance with the approved application and supplement the regular program of education for students. This document provides the guiding questions used by the Department of Public Instruction (DPI) during monitoring reviews. The document will help LEAs prepare evidence for discussion of the Title I, Part D program requirements. For clarification on any aspects of the monitoring guidance, please contact the Title I, Part D, Subpart 2 consultant, Kim Jenkins, at kimberly.jenkins@dpi.wi.gov, or the Title I, Part D, Subpart 2 grants specialist, Clara Pfeiffer, at clara.pfeiffer@dpi.wi.gov.

Section 1: PROGRAM OBJECTIVES

Requirement 1.1:

The purpose of Title I, Part D, Subpart 2 is to support the operation of LEA programs that collaborate with locally operated institutions to carry out high quality education programs designed to meet the needs of at-risk students in the following areas, as applicable:

- identifying student specific academic and other support needs
- employment or training programs
- activities to facilitate transition of students
- technology to support instruction
- innovative program options and strategies that prepare at-risk students for secondary school completion, training, employment, or further education

20 U.S.C. 6451, 20 U.S.C. 6454 (a)

1.1. Required Documentation:

A synopsis of the LEA and locally operated institution's educational program and the program's goals supported by Title I-D funds at each institution.

1.1. Guiding Questions:

1. Is the submitted application reflective of the program being implemented?
2. What are the various approaches used to accomplish the goals identified for the Title I-D program?
3. Briefly describe how collaboration and coordination efforts were carried out for Title I-D program development and program evaluation processes. Who participated in the planning efforts for these areas?

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Section 2: TRANSITION

Requirement 2.1:

Transitional and supportive programs operated under this subpart shall be designed primarily to meet the transitional and academic needs of students returning to LEAs or alternative education programs from correctional facilities. Services to students at-risk of dropping out of school shall not have a negative impact on meeting the transitional and academic needs of the students returning from correctional facilities.

20 U.S.C. 6452(d)

2.1. Required Documentation:

Evidence of a transition program for students, to include a focus on a smooth and successful return back into the community. As applicable, evidence may include:

- Transition programming description
- Progress monitoring data
- Career and Technical Education program syllabus or outline
- Roles and responsibilities of the transition coordinator or similar position
- Agendas or emails demonstrating within organization and/or cross-agency work supporting student transition
- Credit recovery practices
- Post-secondary guidance

2.1. Guiding Questions:

1. What programs or strategies have been implemented with Title I, Part D funds to enable students to have transitional success at various levels? (*e.g., returning to school, community, employment, post-secondary school, and families*)
 - a. How are students accessing credit recovery?
 - b. What procedures are in place for students to successfully transition back to their home school to continue their education?
 - c. What career or post-secondary guidance do students receive?
 - d. How are students gaining post-secondary skills and high school credit? (*where applicable*)
2. What programs or strategies have the greatest impact on improving outcomes for students?

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Section 3: FORMAL AGREEMENT

Requirement 3.1:

Each LEA receiving funds under Title I, Part D, Subpart 2 must ensure a formal agreement is developed with correctional facilities and alternative school programs serving children and youth involved with the juvenile justice system institution that will provide the programs for residential neglected and delinquent youth.

20 U.S.C. 6453 (2), 20 U.S.C. 6455

**The formal agreement must clarify the roles and responsibilities of each party to ensure that students have the same opportunities as their peers in public education. The agreement must include LEA/institution representatives and, if applicable, third-party/ CESA personnel in the development process; and the formal agreement must clearly delineate the responsibilities and timelines of all appropriate parties from each entity.*

***The National Technical Assistance Center for the Education of Neglected or Delinquent Youth (NDTAC) provides [guidance on developing a Formal Agreement between the LEA and the correctional institution](#).*

3.1. Required Documentation:

A formal agreement for each institution.

The agreement must include how the LEA and the correctional institution will work together to ensure:

- if a child or youth is identified as in need of special education services while in the correctional facility, the facility will have a process to notify the local school of the child or youth of such need;
- the LEA and the institution provide support programs that encourage children and youth who have dropped out of school to reenter school and attain a regular high school diploma once their term at the correctional facility has been completed, or provide such children and youth with the skills necessary to gain employment or seek a regular high school diploma or its recognized equivalent;
- the correctional facility is staffed with teachers and other qualified staff who are trained to work with children and youth with disabilities taking into consideration the unique needs of such children and youth;
- that educational programs in the correctional facility are related to assisting students to meet the challenging State academic standards;
- funds received under this subpart are coordinated with other local, State, and Federal funds available to provide services to participating children and youth, such as funds made available under title I of Workforce Innovation and Opportunity Act, and career and technical education funds;

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- programs operated under this subpart with activities funded under the Juvenile Justice and Delinquency Prevention Act of 1974 and other comparable programs are coordinated with, if applicable;
- upon the child's or youth's entry into the correctional facility, the child's or youth's family members and the local educational agency that most recently provided services to the child or youth (if applicable) are worked with to ensure that the relevant and appropriate academic records and plans regarding the continuation of educational services for such child or youth are shared jointly between the correctional facility and local educational agency in order to facilitate the transition of such children and youth between the local educational agency and the correctional facility; and
- the local educational agency is consulted with for a period jointly determined necessary by the correctional facility and local educational agency upon discharge from that facility, to coordinate educational services so as to minimize disruption to the child's or youth's achievement.

3.1. Guiding Questions:

1. Was the formal agreement carried out as written?
2. In what ways has the facility staff been able to support the education program? In what ways has the school staff been able to support the facility?
3. Are modifications necessary to ensure objectives are achievable in the coming year? If so, what changes will be implemented in the following year?

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Section 4: PROGRAM EVALUATION

Requirement 4.1:

Each LEA that conducts a program under Title I, Part D, Subpart 2 shall evaluate the program, not less than once every three years, to determine the program's impact. Each LEA shall submit evaluation results to the SEA and use the results to plan and improve subsequent programs for participating children and youth.

20 U.S.C. 6471, 30 U.S.C. 6456

**The Title I-D team at Wisconsin's Department of Public Instruction has a [Title I-D Program Evaluation Tool](#) that may be helpful for this requirement.*

4.1. Required Documentation:

4.1.a. A disaggregation of student achievement data by gender, race, ethnicity, and age. Using the data, include an analysis of the program and student success for each institution.

And

4.1.b. A description of how each institution uses data in order to maintain and improve educational achievement, operate and enhance transitional programs, and facilitate credit accrual for the purpose of grade promotion, graduation, or an equivalent graduation program.

4.1. Guiding Questions:

1. What data is available to determine the program's impact on the ability of participants to:
 - a. maintain and improve educational achievement;
 - b. accrue school credits that meet state requirements for grade promotion and secondary school graduation;
 - c. make the transition to a regular program or other education program operated by an LEA;
 - d. complete secondary school or secondary school equivalency requirements, and obtain employment after leaving the correctional facility or institution for neglected and delinquent children and youth; and
 - e. as appropriate, participate in post-secondary education and job training programs?
2. Based on the data, what programs or strategies are improving outcomes?
3. Provide an example of when the school has adjusted or changed strategies because the data was showing that it was not resulting in student growth.