

ESSA Quick Reference Brief: ESEA Program Monitoring

Titles I-A, II-A, IV-A, V-B, Equitable Services, McKinney-Vento, and Foster Care

The Every Student Succeeds Act (ESSA), signed into law on December 10, 2015, reauthorized the Elementary and Secondary Education Act (ESEA) to create a long-term, stable federal policy that gives states additional flexibility and encourages innovation, while holding states accountable. ESSA requires that SEAs monitor and evaluate these programs' impact to ensure that all students, particularly those from historically underserved groups, have equitable access to a high-quality education.¹

Purpose of Monitoring

While accountability to federal requirements is important, the ultimate goal of monitoring is to support districts in the examination and refinement of their systems around federal programs. Our purpose for monitoring has three parts:

1. **Building Relationships – We're in this together.** The main objective for the Oregon Department of Education (ODE) is to raise achievement for Oregon's public-school children. Through cooperative assessment of the federal programs between ODE and Oregon school districts the quality of services to students is strengthened and improved.
2. **Providing Technical Assistance – We're here to help.** ODE monitoring team members provide technical assistance during the review and beyond. It is not ODE's intent to tell the district how to run its Title programs, but rather to answer questions, facilitate dialogue, and exchange ideas and information for program improvement while, at the same time, meeting all federal requirements.
3. **Ensuring Compliance – It's the law.** Monitoring federal programs helps ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education. Monitoring is intended to be a collaborative partnership between ODE and districts to ensure compliance with ESEA.

Selecting Districts for Monitoring

The Elementary and Secondary Education Act (ESEA) as amended by Every Student Succeeds Act (ESSA) requires the Oregon Department of Education (ODE) to regularly monitor entities that receive allocations of federal funds. The [Uniform Grant Guidance](#) requires districts be monitored based on a risk assessment that measures student achievement data, fiscal information, and a variety of factors that suggest a district may be in need of additional support.

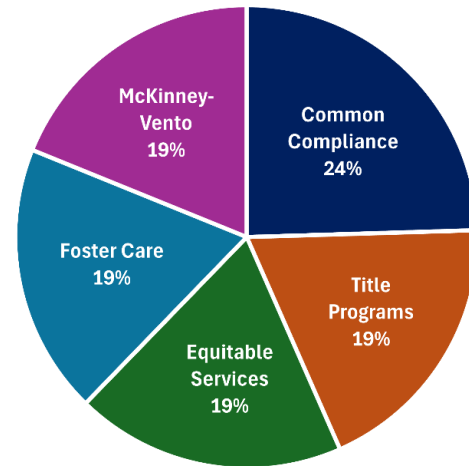
At the close of each school year, the ESEA Monitoring Team at ODE reviews and analyzes data for all school districts. Districts selected for monitoring based on the risk assessment are monitored across the following programs:

- Title I-D
- Title II-A
- Title IV-A
- Title V-B REAP
- Title V-B RLIS
- Equitable Services to Private Schools
- Foster Care
- McKinney-Vento

¹ 2 CFR 200.332(e)
Updated September 2025

Beginning with school year (SY) 2025-26, the risk assessment was expanded to 31 risk factors across 5 risk categories:

- Common Compliance (65 points)
- Title Programs (50 points)
- Equitable Services to Private Schools (50 points)
- Foster Care (50 points)
- McKinney-Vento (50 points)



Risk is determined by what percentage of points a district receives across all the risk factors in which they are eligible to receive points, with a possible total of 265 points across all categories.

Tiered Monitoring Process

Based on the outcome of the [Risk Assessment](#), districts are identified for tiered monitoring as either Tier 1, Tier 2, or Tier 3.

- **Tier 1** districts identify an internal team to complete the **self-assessment**, which is reviewed by ODE staff.
- **Tier 2** districts also complete the **self-assessment**, and in addition participate in the **desk monitoring process**.
- **Tier 3** districts complete the **self-assessment** and **desk monitoring** process, along with an **on-site visit**.

Tier 1

Districts identified as Tier 1 are determined to have the lowest risk based on the risk assessment. Tier 1 districts identify an internal team to complete the [self-assessment](#). The self-assessment is aligned to programmatic requirements laid out in ESEA and is designed to help districts examine their practices around federal programs and develop shared understanding of the district's current practices relative to ESSA requirements, noting strengths and identifying where technical assistance/support may be needed from ODE.

Each district decides the appropriate staff to involve, but participants should include those who have the most knowledge of and/or responsibility for the programs included. The self-assessment is submitted via Smartsheet and reviewed by ODE program specialists who provide feedback. Depending on the responses to the self-assessment, districts may be guided to review specific resources or asked to participate in a virtual follow-up discussion.

Tier 2

Districts identified as Tier 2 also complete the **self-assessment**, and in addition participate in the **desk monitoring** process which has four phases:

- Entrance Meeting
- Submission of evidence by district
- Review of evidence by ODE staff
- Exit meeting

The Entrance Meeting (virtual) is an opportunity to learn more about the current conditions in the district and discuss the district's responses to the self-assessment. The district is also provided with a [submission list](#) outlining the materials that must be submitted. The type of materials requested vary by program and are designed to provide evidence of the LEA's use of funds and compliance with programmatic requirements. Monitoring staff review the materials during the desk monitoring window, which typically falls in February.

The Exit Meeting (virtual) takes place after all materials have been reviewed. The ODE staff share preliminary findings, including any specific issues that must be addressed by the district to reach compliance. The district can ask questions, highlight concerns and respond to preliminary findings. Depending on whether findings are resolved at the Exit Meeting, the district receives either a letter of compliance or a report outlining the additional evidence needed to demonstrate compliance.

Tier 3

In addition to what is required for Tier 2 monitoring, districts identified as Tier 3 participate in an **on-site visit**. Development of the agenda and schedule of the on-site visit is a collaborative effort between district and ODE staff, and the focus is based on the results of the desk monitoring process and any areas that are identified as needing resolution. While each on-site visit is tailored to the needs of the district, on-site visits typically include opening and closing meetings with the district team, spending time in school buildings and classrooms and leading conversations with program-specific staff, and occasionally, families. Districts receive a formal report within 30 days of the visit, summarizing the on-site activities, highlighting any themes observed, and outlining any remaining resolutions needed.

Resources

- [District Guide to ESEA Monitoring](#)
- [ESEA Monitoring web page](#)