

TITLE I-D SUBPART 2 COORDINATORS HANDBOOK



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves . . . together!

CONTENTS

| | | | |
|---|-----------|---|-----------|
| INTRODUCTION | 3 | DATA COLLECTIONS | 23 |
| Students First | 3 | October Caseload Count | 23 |
| PURPOSE AND PRIORITIES OF TITLE I-D | | Consolidated District Performance Report..... | 25 |
| SUBPART 2..... | 4 | Submit Data to ODE..... | 26 |
| Purpose | 4 | RESOURCES | 27 |
| Priorities | 4 | Definitions | 27 |
| TITLE I-D, SUBPART 2 QUICK START..... | 5 | Additional Terms | 28 |
| QUALIFYING FACILITIES AND FUNDING..... | 7 | Helpful Websites | 29 |
| Qualifying Facilities | 8 | TITLE I-D SUBPART 2 PLAN GUIDING | |
| Funding..... | 9 | QUESTIONS | 30 |
| LEA Allocations | 10 | TITLE I-D SUBPART 2 PROGRAM PLAN | 31 |
| Use of Funds | 11 | Assessing and Meeting Student Strengths and Needs | |
| Prioritization of Funds | 12 | | 31 |
| Carryover Funds | 12 | Program Coordination | 32 |
| District Eligibility..... | 13 | Family and Community Support..... | 32 |
| LEA PLAN REQUIREMENTS | 14 | Transition Planning..... | 33 |
| Assessing and Meeting Student Needs and Strengths | | Program Evaluation | 33 |
| | 15 | TITLE I-D SUBPART 2 QUALIFYING FACILITY | |
| Program Coordination | 17 | CHANGE FORM | 34 |
| Family and Community Support..... | 18 | TITLE I-D SUBPART 2 PLAN EVALUATION | 36 |
| Transition Planning..... | 19 | | |
| Program Evaluation | 21 | | |
| MONITORING..... | 22 | | |
| Fiscal Monitoring..... | 22 | | |
| Program Monitoring..... | 22 | | |

INTRODUCTION

Every day, 60,000 students nationwide attend school in a juvenile justice facility.¹ These students face many of the same challenges as their peers in more traditional settings. They navigate learning differences, language barriers, learning gaps, and trauma. Their pathway to graduation is additionally challenged by the movement between schools, facilities, and the community. State and local education agencies are responsible for providing a pathway to graduation and postsecondary success for each student. The Elementary and Secondary Education Act (ESEA) provides specific financial resources, through the Title I-D program, to districts and facilities to provide supplemental services to students navigating the juvenile justice system or residential treatment facilities.

Title I-D, Subpart 2, provides resources to local educational agencies to ensure that students navigating juvenile justice and specific residential facilities have access to enriching curriculum and the resources to meet the state's academic and health standards. When used strategically and in coordination with agency and community partners, these funds can improve student outcomes and reduce recidivism.

On average, between twelve and fourteen school districts receive Title I-D, Subpart 2 funds each year. These funds are awarded to districts that have a locally run facility within their district boundaries. This handbook is designed to support local education agencies in managing Title I-D, Subpart 2 grants. Topics covered include eligibility requirements, data collection activities, allowable use of funds, and program evaluation. For additional information, please contact:

Jen Engberg, Education Specialist 2
Oregon Department of Education
Jennifer.engberg@ode.oregon.gov
971-208-0207

Students First



Students served with Title I-D funds are just that; they are students first. Academic success, student engagement, high school graduation, and college and career readiness are the top priority. The purpose of Title I-D funds is to overcome barriers and leverage student strengths. While the language of the law is outdated, conversations about students should always be asset based.

¹ American Civil Liberties Union website, accessed April 2024

PURPOSE AND PRIORITIES OF TITLE I-D SUBPART 2

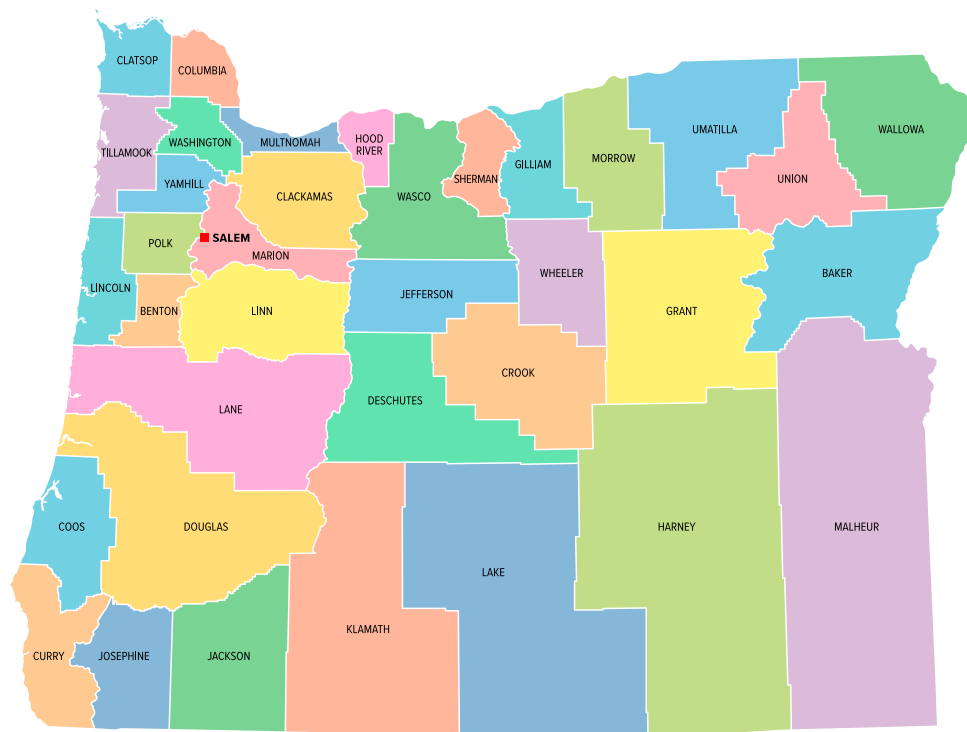
Purpose

Title I-D, Subpart 2 of the ESEA provides financial assistance to support school districts' programs involving collaboration with locally operated residential facilities for "neglected or delinquent" children and youth. The federal government allocates funds to states based on enrollment collected through an annual survey known in Oregon as the Title I-D October Caseload Count.

Priorities

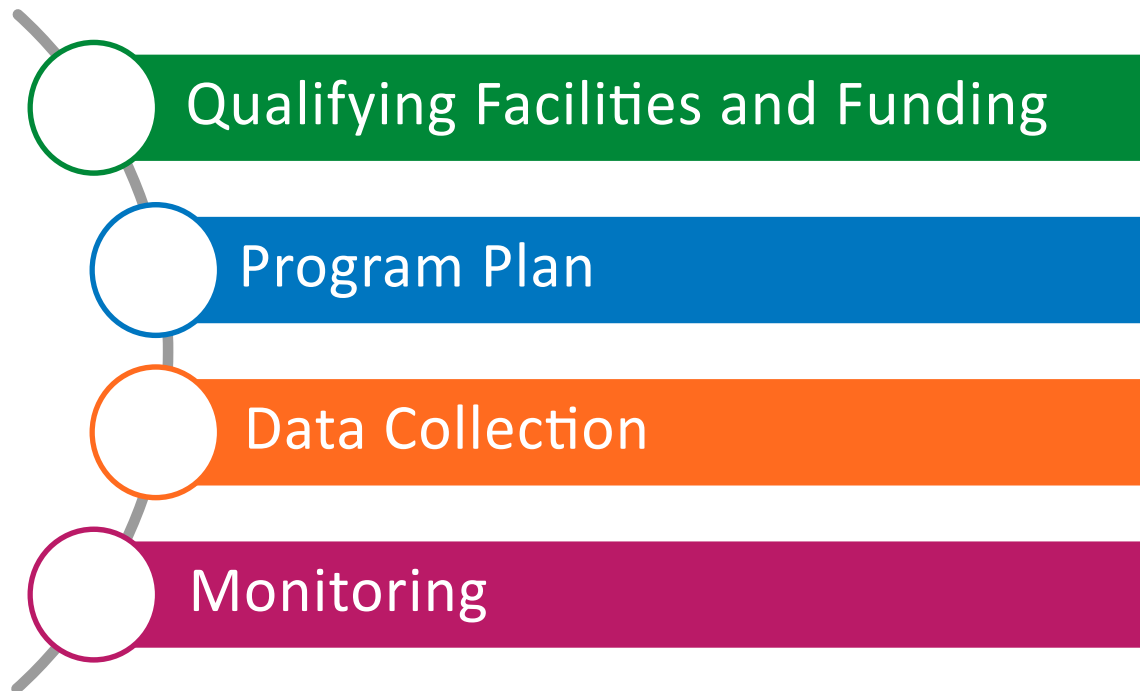
1. Ensure that students in a participating facility meet the same challenging state academic standards that all students are expected to meet.
2. Improve educational services for students who meet the definition of "neglected," "delinquent," or at risk of involvement with the juvenile justice system.
3. Provide students in a participating facility with the services needed to make a successful transition from facilities to schools and/or employment.
4. Prevent students who are at risk from dropping out of school.
5. Provide students who have dropped out of school, or who are returning to school after residing in a facility, with a support system to ensure their continued education.

In addition, effective support and intervention when transitioning between facilities and community education programs has been proven to reduce recidivism. Title I-D, Subpart 2 provides funds to school districts to support students and collaborate with local facilities to implement effective programs.



TITLE I–D, SUBPART 2 QUICK START

Districts receiving Title I-D, Subpart 2 funds must meet certain requirements, as outlined in ESEA Section 1402. Many of these requirements are similar to those of other federal title funds. These requirements can be categorized into the four areas below. The Title I-D Subpart 2 Handbook contains detailed information about each area.



Qualifying Facilities and Funding

A district must have a qualifying facility within its boundaries to receive funds. Once confirmed by the Oregon Department of Education (ODE), the district is eligible for federal funding to support these students' unique strengths and needs. Funding is driven by an annual data collection and may be used to meet the intents and purposes of Title I-D, Subpart 2 as outlined in ESEA.

Program Plan

- Plan Narrative
 - Responses to plan requirements, collected in CIP Budget Narrative
- Budget Narrative
 - A description of how Title I-D funds will be used to support the plan(s)
- Evaluation
 - Completed once every three years, submitted during a program monitoring visit

Data Collections

There are two required data collections for districts receiving Title I-D, Subpart 2.

- [October Caseload Count](#)
 - This helps determine the district's allocation for the following school year
- [Consolidated District Performance Report](#)
 - Similar to Title I-A, districts must report on the performance and progress of students being served.

Monitoring

The ODE is required to monitor all districts receiving federal funds. Monitoring is a partnership between ODE and districts to ensure that the goals of the program are implemented and to share best practices. Title I-D, Subpart 2 Monitoring is performed in two parts:

- Fiscal Monitoring
 - Takes place when the district is monitored for Titles I-A, II-A, IV-A and V-B
 - Components include a review of expenditures, [time and effort](#) documentation, and [inventory](#) records
- Program Monitoring
 - Takes place every three years, with an on-site visit
 - Components include review of program plans, evaluations, and any applicable formal agreements between the school district and local facilities

Please visit the [ESEA Monitoring Website](#) for the most current information

QUALIFYING FACILITIES AND FUNDING

Oregon school districts may be eligible to receive Title I-D, Subpart 2 funding if there is a qualifying facility within district boundaries. Qualifying facilities must meet the following criteria, as outlined in ESEA, Sec 1402:

1. Is locally run by a city, county, or private organization, and
2. Is a residential facility with a chartered purpose for “neglected” or “delinquent” students.¹

The jurisdiction and program at the facility are the determining factors in whether a district is eligible for funding.

WORDS MATTER!

The Elementary and Secondary Education Act uses very specific language to describe eligibility requirements for Title I-D. While terms such as “neglected youth” and “delinquent youth” are outdated and not asset based, it is important to be precise with language discussing legal requirements. “Students involved in the juvenile justice system” should be used instead.



¹ ESEA Sec 1432 and 34 CFR § 200.90(c)

Qualifying Facilities

Title I-D, Subpart 2 supports districts that have specific facilities for students within district boundaries. These facilities must be **locally** run, be a **residential** facility, and have a chartered **purpose** to serve students court ordered to their supervision. The following questions can help districts determine whether a qualifying facility is within their boundaries.

Who runs the facility?

- Facilities run by city or county agencies, such as Jackson County Juvenile Detention, meet the locally run requirement.
- Facilities run by private or community organizations meet the locally run requirement.
- Facilities run by the Oregon Youth Authority or another state agency, are not eligible for Title I-D, Subpart 2 funding.

Are students residing at the facility?

- Programs supporting students as on-site residents meet this requirement.
- Community Day Programs, or those that do not serve as housing, do not meet this requirement.
- Community Day Programs can be served with Title I-D Subpart 2 funds, but participants may not be counted for district eligibility to receive funding

What is the purpose of the facility?

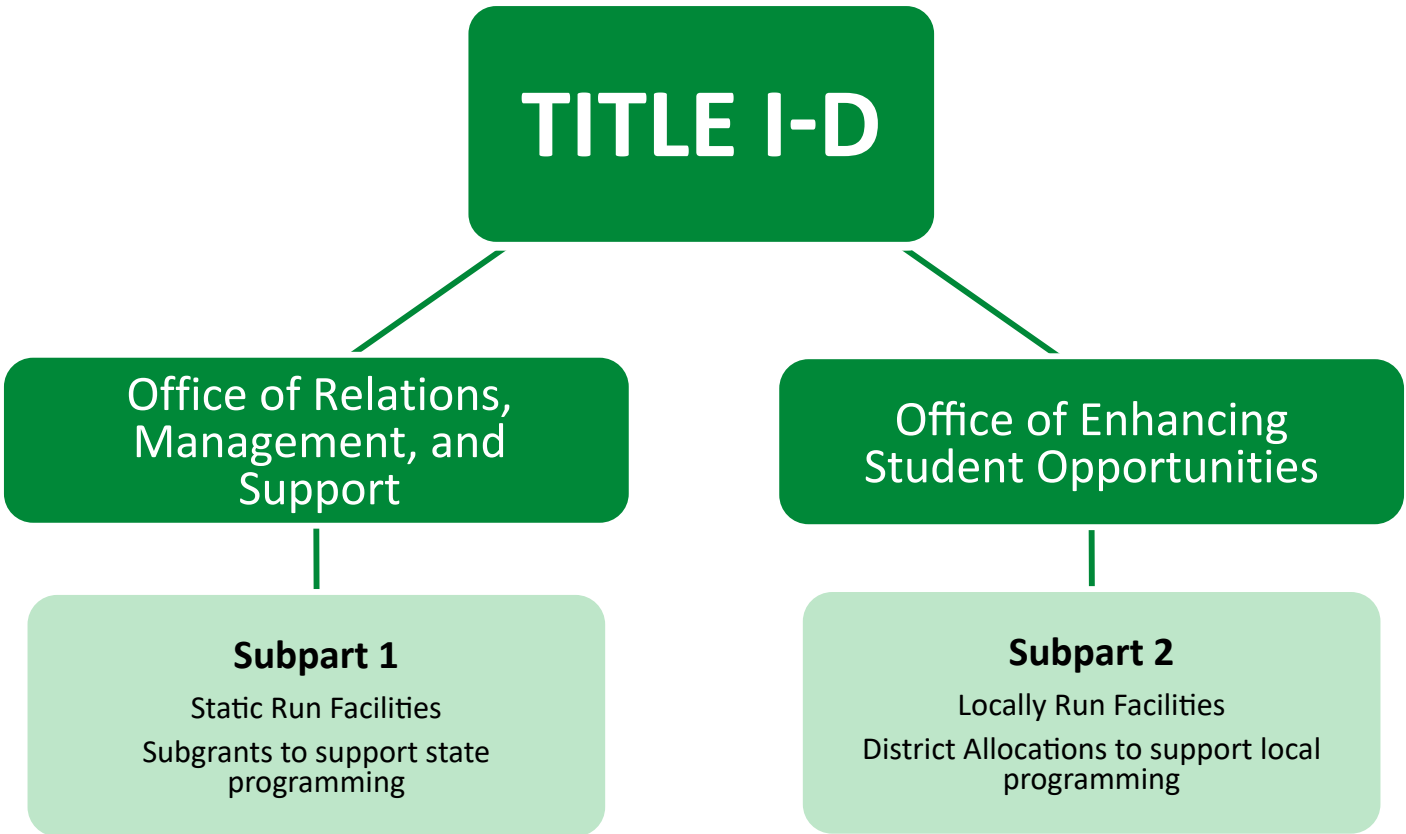
- “Delinquent” facilities typically care for students who are under court ordered supervision as the result of being adjudicated by the justice system. This also includes court ordered residential treatment for substance use disorders.
- “Neglected” facilities typically care for students who are placed, or court ordered to participate in the program due to:
 - Death of parents/guardians
 - Abandonment or neglect by parents/guardians
 - Necessary separation from parents/guardians for behavioral, emotional, or substance use challenges

Note: Foster Care homes are excluded as qualifying facilities, per ESEA Section 140

Funding

Two Funding Subparts

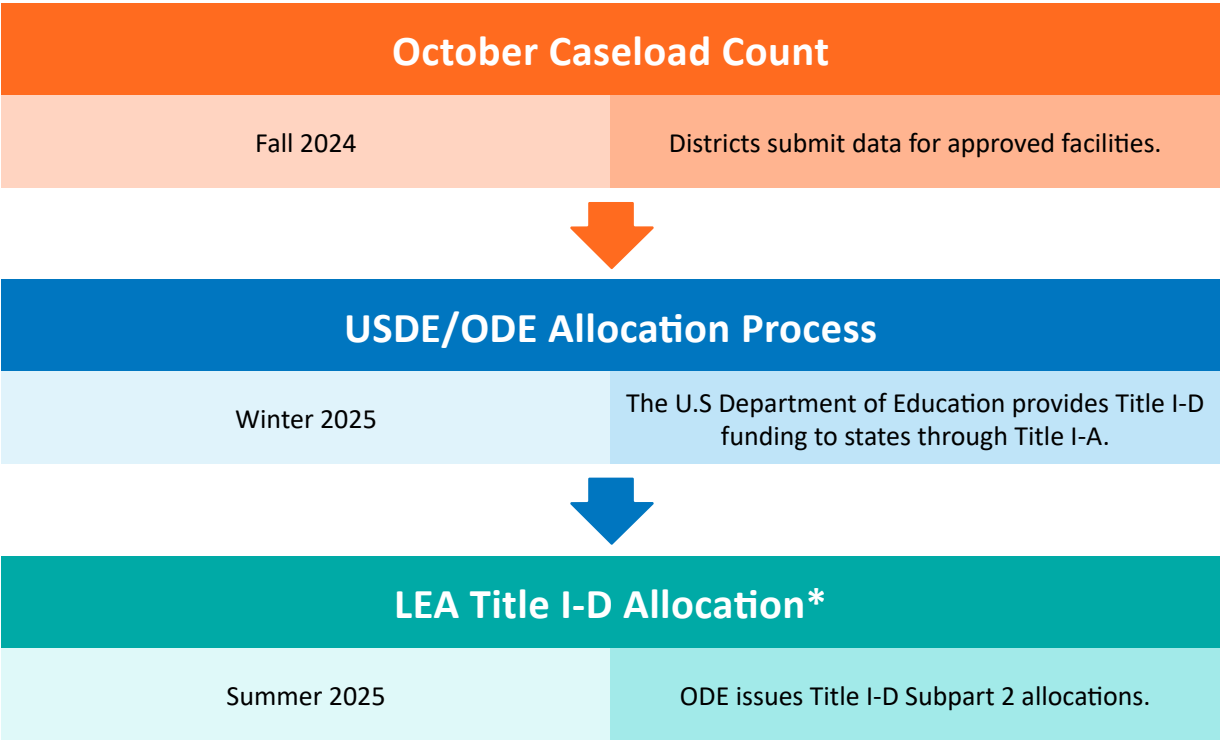
Title I-D consists of two subparts. Subpart 1 provides funding to support education for students in state operated justice facilities and programs. These programs are operated by the Office of Enhancing Student Opportunities at ODE. Subpart 2 provides funding to local educational agencies to support students in locally operated facilities. The Federal Systems Team in ODE oversees the implementation of these grants.



LEA Allocations

Subpart 2 allocations are provided to districts with locally run juvenile justice and residential facilities in the district boundaries. Each fall, qualifying districts participate in the [October Caseload Count](#). This data is used to determine Title I-D, Subpart 2 allocations for the following school year. Allocations are based on a per-pupil amount of Oregon’s overall Title I-D Subpart 2 allocation. The student counts for each district are adjusted to account for districts also reported under Subpart 1. In the event a student is double counted, the funding is provided to Subpart 1.

Title I-D Subpart 2 Funding Process



*Districts receiving funding for students counted in neglected facilities in the October Caseload Count will receive additional funding through Title I-A allocations.

Any district accepting Title I-D, Subpart 2 funds must submit an application through the CIP Budget Narrative. The application requires a program budget and a detailed description of the district’s program plan.

Use of Funds

A district may use Title I-D, Subpart 2 funds to provide a variety of *supplemental* activities, including transition services, dropout prevention, social services, and vocational programs.² For example, funds may be used to:

- Carry out high-quality education programs that prepare students to complete high school, enter training or employment programs, or further their education;
- Provide activities that facilitate the transition of students from the justice program to further education or employment;
- Operate dropout prevention programs in local schools for students who are at-risk of not graduating; and
- Coordinate health and social services, including substance abuse counseling and mental health services.

As with all federal grants, Title I-D, Subpart 2 funds are subject to both Uniform Grants Guidance cost principles³ Which ensure that all expenditures are **necessary** for the operation of the Title program, **reasonable** in cost and related to the purpose of the funding requirements, and **allocable**. If the activity or service is something required under state or district policy for all students, it may indicate a supplanting concern. More detailed information can be found in ODE's and [Supplement not Supplant](#) reference briefs. [Allowability](#) and [Supplement not Supplant](#) reference briefs.

Funding the Plan

When creating program plans and budgets, consider the following questions to help guide the use of Title I-D, Subpart 2 Funds:



- ✓ Does it serve the purpose of the program?
- ✓ Is it aligned with your needs assessment and included in your approved narrative?
- ✓ What is the size of the cost compared to the overall budget?
- ✓ Is the cost permissible under federal, district, state, and local policies?
- ✓ Is this purchase supplemental to what is required to be provided?

² ESEA Section 1424

³ 2CFR 200.403

Allowable and Unallowable Activities

This chart represents expenditures commonly considered, but it is **not** an exhaustive list of all allowable and unallowable uses of Title I-D funds.

| Allowable | Unallowable |
|---|--|
| <ul style="list-style-type: none">✓ Assessments for progress monitoring✓ Family engagement activities✓ Health and Social Services✓ Professional Development for staff working in the Title I-D program✓ Supplemental supplies and materials✓ Teachers and staff providing supplemental instruction or behavioral support✓ Transition services | <ul style="list-style-type: none">✗ Building maintenance or repairs✗ Entertainment, recreation, or social events, not tied to Title I-D plan goals✗ Materials or curriculum to meet state requirements✗ Security monitoring systems, cameras, or staff✗ Special education services |

Prioritization of Funds

While the law allows for a wide range of allowable activities, ESEA specifically speaks to how funds should be prioritized. ESEA Sec 1422(d) states that “transitional and supportive programs shall be designed primarily to meet the transitional and academic needs of students returning to local educational agencies or alternative education programs from facilities.” Conducting a thorough needs assessment can help districts ensure that funds are spent with the purpose of the grant at the forefront.

Carryover Funds

LEAs must utilize Title I-D, Subpart 2 funds to support educational services that assist in increasing education outcomes for students. It is the expectation and best practice that Subpart 2 funds are expended during the year in which they are allocated. However, if the LEA's Subpart 2 grant is not utilized within its grant period, 100% of the remaining funds can be carried over to ensure adequate implementation of continued support for children and youth . As with all Title grants, consistently carrying over a large amount of funds increases a district's monitoring risk score.

District Eligibility

Districts are eligible to receive Title I-D, Subpart 2 funding if ODE determines that the facility is locally run and provides qualifying residential services to students. Eligibility is determined through the submission of the Qualifying District and Facility Change Form, followed by a virtual meeting or site visit, as appropriate.

Facility Changes

Occasionally, facilities will open, close, or move across school district boundaries. Changes in facility programming may also impact a district's qualification for Title I-D, Subpart 2 funding. These changes must be communicated to ODE using the Facility Change Form. Some common changes include:

- A new facility opening within a school district's boundaries
- Facility programming changes the focus of a program, population served, or treatment provided
- A facility temporarily moves location due to renovations
- A facility in the school district's boundaries closes.

School districts should communicate known changes to ODE as soon as possible. Early communication is important to ensuring data collections and allocations are accurate. The deadline for notifying ODE of changes is September 30th.



Frequently Asked Questions

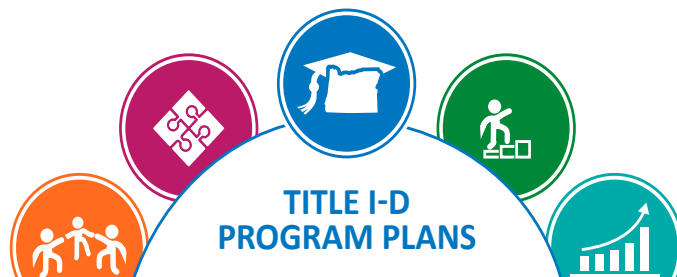
A facility has opened within the school district boundaries. What happens next?

Districts should connect with the facility to learn about the program and students served. If the district and facility believe the program meets the criteria listed above, the district must complete the Title I-D Qualifying District and Facility Change Form and submit to federalprograms@ode.oregon.gov. The Title I-D Program and Data Coordinators will review the information and schedule a follow up meeting.

ODE has confirmed that our district qualifies for Title I-D, Subpart 2 funds. What are the district's obligations?

1. Collaborate with the facility to:
 - a. Determine what students need
 - b. Create a program plan and communication schedule
 - c. Establish data collection processes
2. Participate in the October Caseload Count
3. Engage in Title I-D meetings Apply for Title I-D funds in the following school year

LEA PLAN REQUIREMENTS



Applications for funds are submitted through the Title I-D, Subpart 2 Budget Narrative. In addition to budgetary requests, the application requires specific descriptions of programmatic elements. ESEA allows LEA's to create a plan that fits the unique strengths and needs of the students in the local community. In addition to an overall description of the program, the following elements must be included:



Assessing and Meeting Student Needs



Program Coordination



Family and Community Support



Transition Planning



Program Evaluation

Assessing and Meeting Student Needs and Strengths

All Title I-D, Subpart 2 plans must address the academic, social emotional, and mental health strengths and needs of the students being served. The program plan should reflect the uniqueness of these strengths and needs and use existing educational programs and partnerships to increase student outcomes and progress. While the comprehensive needs assessment process that districts are required to complete as part of the Integrated Programs application can serve as guide to assessing needs, specific data and engagement is required to assess the unique needs of students served by these programs.



Requirements

- ✓ Use multiple sources of data to inform plan development. This may include academic, social emotional, mental health, and any other data that the district and facilities deem sufficient.
- ✓ Include plans for providing special education and Section 504 services, as appropriate
- ✓ Use the results of the needs assessment to design the program plan

Guiding Questions

- ✓ What are the strengths and needs of the students served in this program?
- ✓ What data is available, or needed, to adequately assess student academic and behavioral growth and learning?
- ✓ How will special education services be provided to students with Individual Education Plans (IEP)? How will students with 504 plans be served?
- ✓ How will services be provided to English Learners?

Recommendations for Practice

Identifying Participants

- Local facility administrators (education, mental health, safety and security)
- Students
- Families and guardians
- Teachers in facility and district programs
- School district personnel
- Parole or probation officers
- Community Partners offering support services such as health care, post-secondary education or workforce development

Data Sources

- Academic assessment data in reading and math
- Special Education Goal Progress
- Student Discipline Rates
- English Learner data
- GED Attainment
- 9th Grade on Track
- High School Diploma data
- Credit Attainment
- Surveys
- CTE Participation
- Recidivism Rates

Contributing Factors

While analyzing the needs of students in Title I-D, Subpart 2 funded programs, it is important to consider how contributing factors impact students' success. While many of these factors impact all students, those involved in the juvenile justice system often face additional challenges that may not surface in a larger needs assessment. These include:

- **Learner Factors** (e.g. Engagement, Mobility, Language Barriers, Mental Health, Socio-economic)
 - Engagement: What experiences have led to students' disconnection from education?
 - Mobility: How often are students transitioning between different schools, communities, or facilities? How has this impacted their connection to education and progress?
- **Instructional Factors** (e.g. Culture of high expectations, Continuous improvement processes, Aligned instructional system, Use of MTSS, Extended Learning Time, Teaming, Transition planning)
 - Aligned Instructional System: With multiple transitions, have students had the opportunity to progress in a consistent instructional system? How has this impacted student progress? What accommodations can be made to mitigate inconsistencies and determine student learning progression?
- **Climate / Culture Factors** (e.g. Safe, orderly, engaging and challenging learning environments, Communities of Practice, Recruitment / Retention, Integrated and aligned interventions, Supports for the whole student, Partner Engagement, Two-way Communication)
- **Family & Community Factors** (e.g. Support for the learners' families, Family / community engagement in the learning process, Authentic community engagement, Ability to leverage new and existing partnerships)
 - How might students' support systems vary from their same age peers?
 - How can the district engage with these support systems?



Priority Levels

- Who determines (and should determine) priority? What power do they have (or not have)?
 - How are local facilities involved in the needs assessment and decision-making processes?
 - What process is used to determine the best use of funds to support student needs?
 - If you are navigating differences in perspective and feelings about prioritization, how will you address that? What agreements have you created about engaging tension, allowing for pause/non-closure, or decision-making?

Equity

- What barriers currently exist for student focal groups?
- How do students in this program have access to programs provided to all students?
- How are students provided access to culturally sustaining programs and supports?

How are students accessing special education, English language instruction, and other supports?

<https://www.oregon.gov/ode/studentsuccess/pages/innovation-and-improvement.aspx>

Program Coordination



Districts receiving Title I-D, Subpart 2 funds must coordinate with local programs and facilities that also serve students. While school districts must coordinate with local facilities and other federal grant programs they receive, additional opportunities vary by student and community needs.

Requirements

- Describe any formal agreements that involve Title I-D, Subpart 2 programming
- Include other federal programs, including Career and Technical Education programs, for students being served.
- Collaborate with local facilities or organizations to support social and health services for students.

Guiding Questions

- ✓ What systems are currently in place, or need to be established, to facilitate collaboration between the district and the local facility to ensure the academic program is comparable to the program offered to public school students?
- ✓ What strategies and activities exist that facilitate intra-district partnerships with other federal, state, and local programs, including but not limited to:
 - Career and Technical Education
 - Student Success Act
 - Other Federal Title Programs
- ✓ How will the district work with parole or probation officers to meet students' needs?

Promising Practices

Oregon school districts are braiding Title I-D, Subpart 2 funds with other resources to provide:

- Teen Parent Programs
- Credit Recovery and GED Programs
- Outreach Coordinators to reconnect students to school
- Professional Development
- School based mental health programs



Family and Community Support

Family and community engagement is an important part of serving students under Title I-D, Subpart 2. For students being served, this may mean working with parole or probation officers, other facilities, and families to help support the student. Community organizations, local businesses, and community colleges provide critical resources to support students during summers and after graduation.



Requirements

- Based on student strengths and needs, describe how the district will work with support systems to reduce recidivism and improve school attendance and progress towards graduation.

Guiding Questions

- ✓ How will the program partner and communicate with family members regarding student progress?
- ✓ How will this program coordinate support for participating students through
 - Community Service Organizations
 - Local businesses
 - Local healthcare providers
 - Community Colleges

Promising Practices

Students often face challenges beyond education, including economic difficulties, housing instability, and mental and physical health care needs. In March 2023, The Annie E. Casey Foundation published “Creating Equitable Ecosystems of Belonging and Opportunity for Youth, an Action guide for Cross-System and Section Leaders and Practitioners.” This guide highlights the importance of creating a community of support for students. Partnership possibilities include:

- Opportunities for recreational activities
- Teen parent programs
- Mental and physical health care
- Workforce Development
- Culturally responsive social activities
- Family support services
- Pre-apprenticeship programs
- Mentorships to build prosocial relationships and prevent violence
- Housing Services
- Dual Credit Opportunities

Did you know?

[Oregon’s Youth Development Division](#) aligns systems and invests in communities to ensure equitable and effective services for Throughout Oregon and Tribal Nations, we support educational and career success, disrupt youth crime and violence, and affirm youth strengths and safety.



**Youth
Development
Oregon**

An interactive map with local programs is available on [Youth Development Oregon website](#)

Resources

[Youth Development Oregon](#)

[Ecosystems of Belonging](#), Annie E. Casey Foundation Website

Transition Planning

Students served under Title I-D are often highly mobile and transition between facilities, schools, and community programs frequently. Establishing a plan with input from facilities, students, and families increases the continuity of services, including education.



Requirements

- Coordinate the transfer for academic records as promptly as possible to reduce possible delays in enrollment
- Include opportunities for students to engage in workforce opportunities, post-secondary education, and mentoring
- Focus on credit attainment or GED completion

Guiding Questions

- ✓ What is the current method for exchanging academic records in an efficient and accurate manner?
- ✓ What systems need to be strengthened or created to facilitate this exchange?
- ✓ What resources are available, or need to be established, to ensure:
 - Students are aided when transitioning between public schools and facilities
 - Students are supported with post-secondary planning

Promising Practices

The Neglected and Delinquent Technical Assistance Center (NDTAC) published a [Transition Toolkit](#) (2016), and [Supplement](#) (2023), with recommendations to ensure students transition between programs and to adulthood successfully. Grounded in collaboration and engagement, these documents identify 4 focuses of practice.

Coordinate Information Sharing

Student, Family, & Community Engagement

Safe and Supportive Learning Environments

Comprehensive Teaching and Learning

Coordinate Information Sharing

- Implement a system to provide accurate academic records efficiently
- Create shared resources and policies to support students, such as electronic record sharing and digital curricula

Engage Students, Families, and Communities in Planning

- Prioritize student voice and goals
- Partner with communities providing supportive services

Safe and Supportive Learning Environments

- Seek to understand students' experiences and what they need to feel safe
- Hold "warm hand offs" or transition meetings with students

Comprehensive Teaching and Learning

- Provide staff development
- Use academic, behavioral, and social emotional data to improve programs



Resources

Griller Clark, H, Mathur, S. (2016) [Transition Toolkit: Meeting the Educational Needs of Youth Exposed to the Juvenile Justice System, Third Edition](#)

Neglected Delinquent Technical Assistance Center (2023) [Voices from the Field: Transition Tools for Preparing for Youth Community Reentry.](#)

Program Evaluation

Requirements

Any LEA that accepts funds under Title I-D, subpart 2 must evaluate the program and services provided to students. Data must be disaggregated by participation by gender, race, ethnicity, and age, while protecting student privacy. Data submitted for the Consolidated District Performance Report (CDPR) may be part of this process, but the evaluation should also include other sources of data relevant to the program, including but not limited to: If a district funds more than one program with Title I-D, subpart 2 funds, each program must be evaluated.



Each program is evaluated to determine the program's impact on the ability of participants to:

- Maintain and improve educational achievement and to graduate from high school
- Accrue school credits that meet State requirements for grade promotion and high school graduation
- Transition to a regular program or other educational program operated by a local education agency
- Complete high school (or high school equivalency requirements) and obtain employment
- Participate in postsecondary education and job training programs.

Guiding Questions

- ✓ How will the district evaluate the effectiveness of the Title I-D, Subpart 2 plan?
- ✓ How will the district ensure that grant funds are spent in accordance with a formal grant agreement and federal regulations?

Promising Practices

- a. Include student voice in program needs assessment and evaluation
- b. Include CDPR data
- c. Be Creative. Traditional activities and measures of success may not fully assess or meet the needs of the students being served. Consult with the local facility to determine what data they use to measure student progress.

MONITORING

Title I-D Subpart 2 monitoring takes place in two phases. Fiscal components are monitored at the same time the district is selected for [ESEA Federal Monitoring](#). Programmatic components are monitored during a separate site visit, once every three years.

Fiscal Monitoring

When a district is selected for monitoring for other federal Title programs, the district will submit several items that are required of all federal grants. The items collected are referred to as “Common Compliance”, and include, but are not limited to the following:

- a. Expenditure reporting, including receipts and purchase orders, for all activities purchased using title programs for the year(s) that are being monitored
- b. Documentation that tracks the equipment, supplies, and other items bought with funds that are considered “inventory” and
- c. Documentation that tracks the time and effort that all staff who are paid for with Title I-D, subpart 2 funds

Specific information about the items required can be found in the [ESEA Monitoring Organizational Tool](#).

Program Monitoring

Program monitoring for Title I-D, Subpart 2, is completed through a site visit by ODE staff. Site visits are designed to be supportive and provide an opportunity to collaborate. Activities will include:

- Discussing the district’s evaluation of the program
- Reviewing of any formal agreements (if applicable)
- Meeting with partners including community service organizations, probation or parole officers, community health organizations, and local workforce partners (if applicable)
- Providing technical assistance on best practices to effectively implement the program

Site visits occur once every three years and may occur more often if a district is considered to be at risk. Please refer to the Title I-D Website for the monitoring schedule.

Supporting documentation

Collecting the following data can be helpful to prepare for monitoring:

- Expenditure reports*
- Inventory*
- Time and Effort Documentation*
- Program Plans
- Program Evaluation
- Formal Agreements
- CDPR and October Caseload Data Submissions

DATA COLLECTIONS

October Caseload Count

The October Caseload Count, also referred to as the “Annual Count,” determines the following year’s allocations for districts with eligible facilities. Any LEA who wishes to receive an allocation under Title I-D, Subpart 2 must complete and submit a count of students residing in an eligible facility during a 30-day window. This 30-day window must include at least one day in the month of October. Once submitted to ODE, this data will be aggregated with all other districts information and submitted to the U.S. Department of Education for inclusion in the following year’s federal Title allocations.



Collaborate with
Qualifying Facilities



Determine 30 Day
Count Window



Collect Student
Level Data from
each Facility



Submit data to ODE

Collaborate with Qualifying Facilities

Oregon school districts may be eligible to receive Title I-D, Subpart 2 funding if there is a qualifying facility within district boundaries. Qualifying facilities must meet the following criteria:

- Locally Run
- Residential
- Program purpose aligned with Title I-D, Subpart 2
- Not a foster home

For more information on qualifying Facilities, please reference the [Qualifying Facilities and Funding](#) section of this document.

30-Day Count Window

For each qualifying facility with students being reported, districts must select a 30-day snapshot window in which to collect data. This window must be:

- 30 consecutive days, one of which is in October.
- The Facility or Program Start Date is the 1st day of the 30 consecutive days.
- The Facility or Program Start Date must match for all students at that facility
- District or facilities choose the date range

Collecting Eligible Student Data

- An eligible student:
- Is aged 5 through 17
- Was served for at least one day during the 30-Day “snapshot”
- If an eligible student is released and re-enrolled, the student is counted again for each re-enrollment during that 30-day “snapshot”

For each student, collect:

- School District Institution ID#
- Facility or Program Name
- Facility or Program 30-day window “Start Date”
- Student’s SSID #’s

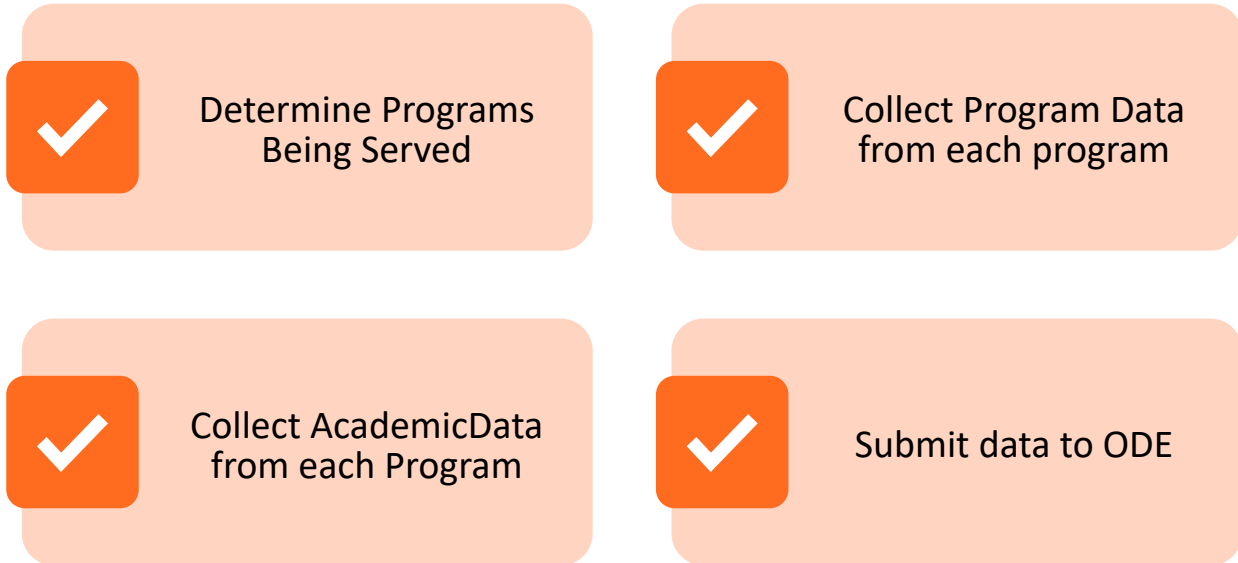
Submit Data to ODE

October Caseload Data is collected each fall and submitted in early December. Training is held in early fall. For the most current information, please visit the [Data & Reporting Requirements for Title I-D](#) website

Consolidated District Performance Report

Like Title I-A, all districts must submit a Consolidated District Performance Report (CDPR) for programs supported with Title I-D, Subpart 2 funds. Every fall, the CDPR data is reported by districts who received Title I-D, Subpart 2 funds in the previous year. The data is collected and reviewed by ODE, before a statewide submission is made to the U.S. Department of Education.

The CDPR report focuses on the demographics of students served, and their accomplishments, whereas the October Caseload counts the number of students served in each facility. Each fall, ODE hosts training sessions to assist districts in submitting this report. Please visit the [Data & Reporting Requirements for Title I-D website](#) for the most current training information.



Determine Programs being Served

Districts must report any programs supported by Title I-D, Subpart 2 funds. This may or may not be the same facility or program that generates the October Caseload Count. The CDPR focuses on how funds were spent.

Collect Program Data

The Title I-D, Subpart 2 CDPR consists of both program and academic data. To prepare for submission, the following data should be collected from each program the district funds with Title I-D, Subpart 2.

Program Data

Who is being served, where and for how long?

- Average Length of Stay
- Race/Ethnicity
- Gender
- Age
- Special Education
- English Learners

Collect Academic Data

Academic Data: How are students in the program doing?

- Reading Performance (pre and post data)
- Math Performance (pre and post data)
- Earned high school credits
- Enrolled in a GED program
- Enrolled in the local district
- Earned a GED
- Earned a high school diploma
- Accepted/enrolled in post-secondary
- Enrolled in job training
- Obtained employment

Academic Data: How are students who participated in the program doing after 90 days of exiting?

- Earned high school credits
- Enrolled in a GED program
- Enrolled in the local district
- Earned a GED
- Earned a high school diploma

Submit Data to ODE

The October Caseload Count and Consolidated District Performance Report data collections both occur in the fall. Training is held in early fall, with submission between late September and early December.

For the most current information, please visit the [Data & Reporting Requirements for Title I-D](#) website



Stay up to Date!

For the most up to date training materials and due dates, please visit the [Data & Reporting Requirements for Title I-D](#) website.

RESOURCES

Definitions

Students and programs served with Title I-D funds use a specific set of terms to determine program eligibility, as well as allowable uses of funds. The Every Student Succeeds Act (ESEA) uses three specific definitions, primarily for determining if a program is eligible to generate funding. The National Technical Assistance Center for the Education of Neglected or Delinquent Children and Youth (NDTAC) also provides a list of commonly used terms used by SEA (State Educational Agency) and LEA coordinators. This document is to reconcile the difference between the definitions or to translate the terms into asset-based, student first language.

What the Law Says:

ESEA outlines three specific definitions under Title I-D¹. These terms both determine which sites are eligible to be included in the October Caseload Count and to describe allowable uses of funds.

At Risk: A school aged individual who is:

- at risk of academic failure,
- at risk of adjudication,
- has a drug or alcohol problem,
- is pregnant or is a parent,
- has encountered the juvenile justice system or child welfare system in the past,
- is at least one year behind the expected grade level for the age of the individual,
- is an English Learner,
- is a gang member,
- has dropped out of school in the past, or
- has a high absenteeism rate at school.

Community Day Program: A regular program of instruction provided by a State agency at a community day school, operated specifically for “neglected” or “delinquent” children and youth.

Institution for Neglected or Delinquent Children and Youth: A public or private residential facility, other than a foster home, that is operated for the care of children who have been committed to the institution or voluntarily placed in the institution under applicable State law, due to abandonment, neglect, or death of their parents or guardians; or a public or private residential facility for the care of children who have been adjudicated to be delinquent or in need of supervision.

¹ ESEA Sec 1432

Additional Terms

Title I-D can provide a variety of resources to qualifying students. The following definitions are commonly used for determining eligibility and allowable activities under Title I-D. Additional information can be found on the [NDTAC Website](#).

| Term | Definition |
|---------------------------|---|
| Delinquent Facilities | <p>Facilities eligible for Title I-D funds are divided into the following three categories for reporting purposes:</p> <ul style="list-style-type: none"> ▪ Juvenile detention ▪ Juvenile correctional facilities ▪ Adult correctional facilities <p>An institution for children and youth that is a public or private residential facility, other than a foster home, and is operated for the care of children and youth who have been adjudicated delinquent or need supervision as determined by local jurisdiction.</p> |
| Detention Facilities | Detention facilities are shorter term institutions that provide care to children who require secure custody pending court adjudication, court disposition, or execution of a court order, or that provide care to children after commitment. |
| Juvenile Corrections | A public or private residential facility, other than a foster home, that is operated for the care of children and youth who have been adjudicated delinquent or need supervision. For Subpart 1 purposes, a facility must have an average length of stay of at least 30 days. There is no such requirement for Subpart 2. |
| Locally Operated Facility | A public or private institution and community day program or school, not operated by the State, that serves at risk children and youth. In Oregon, this includes county run facilities, but not those run by the Oregon Youth Authority. |
| Long-Term Students | Long-term students are those who have been enrolled in a program for 90 or more consecutive calendar days. Multiple admissions cannot be added together. |
| Multipurpose Facility | A multipurpose facility is an institution, facility, or program that serves more than one programming purpose. For example, the same facility may run both a juvenile corrections program and a program for youth who are neglected. |
| Neglected Programs | <p>Neglected programs are public or private residential facilities, other than a foster home, that are operated primarily for the care of children who have been committed to the institution, or voluntarily placed under applicable State law, due to abandonment, neglect, or death of their parents or guardians. For Subpart 1 purposes, a facility must have an average length of stay of at least 30 days. There is no such requirement for Subpart 2.</p> <p>Note: Neglected programs and students receiving funds solely through Title I, Part A, should not be reported under Title I-D</p> |
| October Caseload Count | The October Caseload Count is a survey annually administered by the U.S Department of Education's (ED) Office of Elementary and Secondary Education (OESE) . For this survey, States provide a count of the number of children and youth living in State or local institutions for youth who are neglected or delinquent. ED uses these data to determine funding for Title I, Parts A and D. Officially called the "Annual Report of Children in Institutions for Neglected or Delinquent Children, Adult Correctional Institutions, and Community Day Programs for Neglected or Delinquent Children," this data collection is also sometimes referred to as the "Annual Count." |
| Reporting Year | A reporting year is the same as the definition of a school year: July 1, 2023–June 30, 2024. |
| Unduplicated Count | An unduplicated count is one that counts students only once, even though they may have been admitted to a facility or program multiple times within the reporting year. |

Helpful Websites

The following websites contain information about juvenile justice, current best practices, and federal grant information.

[National Technical Assistance Center for the Education of Neglected or Delinquent Children & Youth](#) (NDTAC)

NDTAC is a national resource center providing information and support for Title I-D

[Office of Elementary and Secondary Education](#),

U.S. Department of Education website for all federal education grants

[ODE Elementary and Secondary Education Act Grant & Program Information](#)

Oregon Department of Education website for all federal grants under ESEA

[Office of Juvenile Justice and Delinquency Prevention](#)

U.S. Department of Justice website providing resources to help create effective and equitable juvenile justice systems and relevant statistics

TITLE I–D SUBPART 2 PLAN GUIDING QUESTIONS

The following questions may be helpful when creating a program plan. These questions reflect the plan requirements as stated in ESEA, Section 1423.

Assessing and Meeting Student Strengths and Needs



- ✓ What are the strengths and needs of the students who are served in this program?
- ✓ What data is available, or needed, to adequately assess student academic and behavioral growth and learning?
- ✓ How will special education services be provided to students with Individual Education Plans (IEP)? How will students with 504 Plans be served?

Program Coordination



- ✓ What systems are currently in place, or need to be established, to facilitate collaboration between the district and the local facility to ensure the academic program is comparable to the program offered to public school students?
- ✓ What strategies and activities exist that facilitate partnerships with other federal, state, and local programs, including but not limited to:
 - Career and Technical Education
 - Student Success Act
 - Other Federal Title Programs
- ✓ How will the district work with parole or probation officers to meet students' needs?

Family and Community Support



- ✓ How will the program partner and communicate with family members regarding student progress?
- ✓ How will this program coordinate support for participating students through:
 - Community Service Organizations
 - Local healthcare providers
 - Local businesses
 - Community Colleges

Transition Planning



- ✓ What resources are available, or need to be established, to ensure that the district will assist students transitioning between public schools and facilities?
- ✓ What resources are available, or need to be established, to ensure that the district is supporting students in post-secondary planning? This includes, but is not limited to, attending college, university, or entering the workforce.
- ✓ What is the current method for exchanging academic records in an efficient and accurate manner? What systems need to be strengthened or created to facilitate this exchange?

Program Evaluation



- ✓ How will the district evaluate the effectiveness of the Title I-D, Subpart 2 plan?
- ✓ How will the district ensure that grant funds are spent in accordance with federal grant requirements and any applicable formal agreements?

TITLE I–D SUBPART 2 PROGRAM PLAN

Instructions

Every district receiving Title I-D, Subpart 2 funds must establish a plan to meet the strengths and needs of students qualifying for services. A plan must be completed for each program being served . Program plans must be evaluated by the district and appropriate partners at least once every three years. ODE reviews the program plans and evaluation data as part of the on-site component to monitoring. The following is a template that can be used by the district to create a Program Plan

INSERT HEADING HERE

Name of School District:

Name of Qualifying Facility:

Program/Location of Services:

Assessing and Meeting Student Strengths and Needs



- Describe the students to be served, including academic, social-emotional, and health related strengths and needs.
- Describe how these strengths and needs will be met through the program.

Program Coordination



- Describe how the district and local facility will coordinate services. What agreements (including formal agreements) must be in place to coordinate this partnership
- Describe how this program will be coordinated with other Federal, State, and local programs including Career and Technical Education.

Family and Community Support



- What community partners exist and what arrangements can be made to support the coordination of services and meeting student strengths and needs? What strategies are in place, or need to be implemented, to connect with the family and guardians of students being served in the program. Who is responsible for the engagement and what are the goals of this partnership with parents and guardians.

Transition Planning



- Describe how students will be supported transitioning from the community, facility, and post-secondary life.
- Describe the district's plan to ensure a timely transfer of student records.

Program Evaluation



- Describe how the program will be evaluated.
- Describe how the district will ensure that grant funds are spend in accordance with formal grant agreement and federal regulations

TITLE I–D SUBPART 2 QUALIFYING FACILITY CHANGE FORM



Local facilities and programs within district boundaries often open, change, or close. These changes must be communicated to the Oregon Department of Education. Please submit this form and any questions to federalprograms@ode.oregon.gov.

Date

School District

Locally Run Facility or Program Name

District Representative

Facility/Program Representative

Email:

Email:

Phone:

Phone:

Select the reason for submitting this form:

Facility Opening

Facility Closing

Program Change

Other

Briefly describe the reason for submitting this form

Qualification Facility/Program Questions

Please answer the following questions regarding the local facility or program

What organization runs this facility or program? (e.g. County Juvenile Detention, city or private organization)

What is the charter purpose of the program? What services are being provided? How are participants chosen? (e.g. court ordered, voluntary)

Does this facility provide housing for participants? Is housing mandatory or optional?



For ODE Use Only:

Program Coordinator

Data Coordinator

Date Reviewed

Date Reviewed

Determination

- District is eligible for Title I-D, Subpart 2 funding
- District is NOT eligible for Title I-D, Subpart 2 funding

Comments/Next Steps

TITLE I–D SUBPART 2 PLAN EVALUATION



Instructions

Every district receiving Title I-D, Subpart 2 funds must establish a plan to meet the needs of students qualifying for services. Program plans must be evaluated by the district and appropriate partners at least once every three years. A plan and evaluation must be completed by the district.



Name of School District

Name of Qualifying Facility

Program/Location of Services

Review Date

Reviewing our Plan: Who was at the table? Recommended: district, facility, and program personnel, administrators, teachers, students, families, and community partners

| Name | Title/Role |
|------|------------|
|------|------------|

Looking back: What did our data say about participating students:

- Making academic progress
- Accruing credits towards graduation
- Transitioning between programs of support
- Completing high school or high school equivalency requirements
- Participating in career and technical education or post-secondary planning

Looking forward: Based on what we learned, what will next year's plan look like?

(Program goals, services, etc.)

Fiscal: What is our process for ensuring we are following fiscal requirements?

