

Section G: Ensuring Implementation and Accountability in Local Programs

Developing the Service Delivery Plan (SDP): A Step-by-Step Approach
--

Step 11: Develop plans for supporting local projects in implementing the strategies in the SDP and holding them accountable.
--

Because local projects are the level at which the bulk of direct services occur for migrant children and youth, the local operating agency (LOA) plays a critical role in implementing the strategies the Migrant Education Program (MEP) has identified to lead to achieving the state performance targets. While specific strategies for communication with and technical assistance for LOAs is not required in the SDP, many SDPs include such a section in order to outline ways to ensure local accountability for the SDP.

The process of planning migrant program service delivery at the state MEP level should be mirrored at the local level. LOAs should conduct a needs assessment and identify needs and concerns relative to their population of migrant students, focusing in particular on Priority for Services (PFS) students. Local projects are accountable for contributing to state performance goals. Therefore, they must adopt the strategies that have been identified at the state level, unless they convince the SEA that migrant students in their project do not have the same needs as those that a particular state-level strategy addresses, or that a different strategy of addressing those needs would likely be more effective than the strategies identified in the SDP.

G.1 Ongoing Communication with Local Projects

As in any collaborative initiative, relationship building is key, and good collaborative relationships do not happen overnight. Many state directors have close working relationships with their LOAs, and the local programs look to them as a source of guidance and support.

Continual contact is an effective way to build the collaboration with LOAs and reinforce the implementation of the SDP, as well as to stay abreast of challenges and emerging issues. Consider the following strategies for ongoing communication with LOAs:

- Bi-monthly conference calls
- Listserv or email distribution list
- Website (See Appendix G.1 for links to examples of MEP websites)
- State meeting at the national conference
- Quarterly newsletter
- Yearly visits to LOAs

Appendix G.1 is an annotated list of several state migrant education websites that might give you some ideas for how to develop or improve your state’s migrant education website.

Include in the SDP strategies for ongoing communication with local projects.

G.2 Technical Assistance

Planning professional development. A technical assistance plan for the LOAs should offer resources and training opportunities accessible to every local program director and staff. Technical assistance strategies may include:

- Developing a comprehensive list of national and state resources to provide to local programs.
- Offering training related to the strategies in the SDP. To determine appropriate training topics, consider for each service delivery strategy in the SDP, “What professional development will LOAs need in order to build their capacity to provide services as specified in the SDP?”
- Identifying professional development opportunities in other programs in the state and nationally that would benefit local MEP staff, and provide local programs with an annual schedule of training. (Many states offer conferences on Title I, homeless education, English language learners, dropout prevention, literacy, and exceptional children. Conferences such as these offer opportunities for staff in migrant programs to increase their familiarity with other programs, as well as for staff in other programs to become more aware of challenges migrant students face. *Appendix G.2* provides a chart to be completed with information on upcoming conferences that may be provided to local project staff.)
- Providing training on research-based strategies.
- Training local project staff on aspects of program planning that mirror the process for developing the SDP. Staff in local programs in many cases lack expertise in reviewing data and identifying needs, identifying strategies, aligning program components, involving parents, and evaluating their program. Developing local expertise in these areas would build the capacity for effective program planning at the local level.

We suggest that you include in the SDP a list of professional development opportunities for local projects that will be provided from the state MEP, as well as those that may be available through other programs or conferences.

Developing a system for providing customized technical assistance to specific LOAs. Having a systematic way to identify LOAs that need technical assistance will enable you to target help where it is most needed. Consider the following strategies state MEPs utilize:

- Review local program data annually and identify programs that do not meet project goals

- Develop a technical assistance request form that LOAs may submit to the MEP
- Develop a self-assessment form that local projects may use to determine their needs for technical assistance

The SDP should include the process the state MEP will use to identify LOAs that need customized technical assistance.

G.3 Orienting New Local Project Directors

One of the biggest challenges in program implementation is the discontinuity that occurs when experienced staff members leave and new staff members have to move the program forward. SDPs should account for turnover through mechanisms for ongoing training, customized support, and program documentation.

While SDPs should address the training needs of all staff in the state who serve migrant children each year, new staff members who enter the program after training has occurred could have access to needed information and professional development in the following ways:

- A local program handbook with key information, state forms, and important contacts is a valuable resource for someone who is new to the job. Being mindful of busy schedules, an abbreviated pamphlet could also be used, which could include topics such as:
 - Primary responsibilities of the local project
 - Key contacts
 - Programs with which a new staff member needs to collaborate
 - National and state resources
 - Dates to remember for trainings, conference calls, deadlines
- A welcome packet from the state director can assist new program staff with gaining access to necessary information as well as feeling like part of a network.
- A mentoring program that matches new and experienced staff, or specifically a new project director with an experienced project director, will provide new staff with encouragement and personalized support.
- Program staff should be able to review complete program records. One of the most frightening scenarios for a new staff member is to undertake a job only to discover that there are no files, description of duties or activities, or program history. It is, therefore, important for state directors to reinforce the importance of record keeping with all local program directors. All LOAs should have information on file, such as:
 - Data on migrant children identified in their district
 - Grant applications
 - End-of-year reports
 - Program evaluations
 - Job descriptions/responsibilities
 - Phone and email logs

- Monitoring reports
- Program contacts within the school district
- Community resource contact information
- Parent advisory committee members and meeting notes
- Program budget

You may wish to develop a local program monitoring indicator that sets the expectation that record keeping and documentation must be maintained. You should review these documents periodically through desk monitoring or on-site monitoring. Not only will the documents keep you informed about the program, but they will provide new staff with the background needed to become oriented to the program.

We suggest that you include strategies for training new local project directors in the SDP.

G.4 Setting Expectations and Guiding Implementation of the SDP through the Local Granting Process

An effective strategy for ensuring SDP implementation at the local level occurs through the process of granting funds to local projects. Local project grants should include the SDP Measureable Program Outcomes (MPOs), and they should be required to implement the strategies selected for the SDP unless the SEA is satisfied that the need for the strategy does not exist in their community.

Guide implementation through the local project application. In the local project application, you can establish an expectation for what LOAs should write to in order to receive funding. Generally, critical components of the local project application include:

- Local needs assessment
- Assurance that the local project will seek to achieve the state MPOs and implement the strategies in the SDP
- Additional or alternate strategies (if the local data show that the needs of migrant students in the community do not match those identified in the CNA)
- Activities to operationalize the strategies, included in a project plan
- An evaluation and data collection plan
- Budget

Awards should be made only to those projects that submit strong applications whose activities clearly align with the performance targets, MPOs, and strategies identified in the SDP. You should require any grantees that wish to amend the plan presented in their proposal after the award is made to submit a request to you explaining the rationale for the change and providing data to support the change.

Provide written guidance that explains the alignment between the state and local MEP, what allowable uses of funds are, and other requirements that are mentioned in the law. As an example, to make expectations clear, the 2011 Texas SDP includes written guidelines for LOAs on “Ensuring Appropriate Delivery of Migrant Education Program Services.” (See Appendix G.3.)

*Require an annual update, interim or formative program evaluation, or end-of-year report from local projects that enable you to determine program progress, both in terms of implementation and in terms of results. An annual update, formative evaluation, or end-of-year report should address questions such as, “Did the LOA implement the activities as they were outlined in the proposal?” and “What student outcomes did the program achieve?” In addition, the report should include what the LOA proposes to do differently the following year and what technical assistance it needs from the state level. The data and information required should reflect the questions in the evaluation plan to facilitate the MEP evaluation (See the *Migrant Program Evaluation Toolkit*.) A template for the end-of-year report provided from the state level will ensure that LOAs provide the required information.*

We recommend that you include in the SDP strategies to ensure accountability through the local granting process.

G.5 Local Project Monitoring

Whether done as part of the overall consolidated monitoring of Federal programs or done separately, monitoring of local migrant projects reinforces accountability for state performance goals and MPOs.

The monitoring plan in your state will depend on the number of local projects and state capacity to carry out the task. Monitoring can be conducted through a combination of onsite visits and desk monitoring. Most state directors plan onsite reviews of local projects to occur from once a year to once every five years.

To prioritize which local projects should be monitored and what type of monitoring should occur (desk or onsite), you should identify any local projects that may be experiencing issues of non-compliance with Title I Part C, lack of progress on MPOs, or lack of program implementation evidenced in end-of-year reports. These may be programs to monitor first with onsite visits to identify issues for follow-up technical assistance.

While monitoring tools may vary across states, there are some questions or indicators that are important to include in order to ensure alignment between the state and local plan. Broad categories of monitoring questions or indicators may include:

- Compliance with specific parts of the statute
- Project management
- Staffing
- Professional development

- Service delivery (assessing program effectiveness in relation to the performance targets in the grant application)
- Curriculum and instruction
- Non-instructional support
- Identification & Recruitment
- Identification of PFS students
- Services for preschool migratory children
- Services for out-of-school youth
- Parent involvement
- Student records exchange
- Coordination with other Federal programs such as Title I, Part A; Title III; and Title X, Part C (homeless)
- Community coordination

We recommend that the development of the monitoring tool take place as a collaborative effort among Federal program administrators, local project directors, and the MEP evaluator so that consensus can be reached on monitoring priorities. The Colorado 2008 Service Delivery Plan provides the following description of its process to develop its monitoring tool:

A Task Force was convened consisting of State MEP staff and educators and administrators familiar with Colorado requirements and educational structures, experienced with student observation data and data analysis, knowledgeable about migrant education and English language learners, and available for meeting and observation participation as well as for drafting tools and strategies for observing and monitoring local migrant education projects.

The resulting Auditing Tool for Improving MEP Services (ATIMEP) was included in the *Colorado ID & R Task Force Audit Visit Manual 2008* (<http://www.metaassociates.com/metafiles/AuditPacket.pdf>).

LOAs should be provided the monitoring questions well in advance of the event so that they will know what is expected of them. In addition, for each question, you should inform them of what sort of written records and documentation they must keep on file and provide when the monitoring occurs. *Appendix G.4* provides a list of types of written documentation from the *Colorado ID&R Task Force Audit Visit Manual 2008* that you may consider in your own request for documentation. It is important to include a review of budget expenditures in the monitoring process to note any discrepancies between how funds were proposed to be spent in the application for funds and how they were actually spent.

Findings are to be taken seriously, and LOAs should address them expeditiously. However, we recommend that you view monitoring as part of a continuum of technical assistance with the goal of helping an LOA improve its services. Communicating this perspective in the monitoring process will encourage local programs to provide you with information and documentation that create an honest picture of their services for and challenges related to migrant children and

youth. A finding can be an indication of needed technical assistance and a baseline for improvement.

After the monitoring occurs, you should develop a written report of findings and recommendations and provide them to the local director, as well as the director of the supervising agency or school district superintendent. The report should require that the local agency respond by a certain deadline with a plan for how it will correct any findings or carry out any recommendations. You will need to follow up to ensure that the corrections are made according to the plan.

See *Appendix G.5* for a template for a local program monitoring protocol. We suggest that you include in the SDP the process for selecting LOAs to monitor, the frequency of LOA monitoring, and monitoring indicators or the actual monitoring protocol.

G.6 Recommendations for SDP Planning Team Meeting #4

MEETING #4	
PURPOSE	OUTCOMES
<ul style="list-style-type: none"> Develop strategies to ensure implementation and accountability in local projects 	<ul style="list-style-type: none"> Plans for <ul style="list-style-type: none"> Communication with local projects Technical assistance and training Local granting processes Local monitoring
<p>Suggestions:</p> <ul style="list-style-type: none"> Convene a meeting that includes directors from a range of local migrant projects to explore what type of support they need in implementation of the SDP Conduct a focus group of local directors at a state or national migrant conference 	
<p>Follow up:</p> <ul style="list-style-type: none"> Use recommendations from meeting and focus groups for the section of the SDP on communicating with and providing technical assistance to local projects; provide a draft of the section for review by local project directors Plan an annual survey of local project directors to determine their technical assistance needs regarding SDP implementation 	

Considerations for Small States Small states are at a distinct advantage for enabling the state director to have frequent contact with a limited number of local projects and to develop supportive relationships with the local project directors. We encourage you to develop these collegial relationships where local projects can network among themselves as well as with the state MEP.

G.7 Summary of Key Concepts

- Local migrant projects are accountable for achieving the measureable program outcomes in the SDP.
- Local projects must implement strategies in the SDP, unless they can provide data from a needs assessment to show that migrant students in their community do not have a need that a certain strategy selected in the SDP would target.
- The state MEP should communicate frequently with LOAs and provide technical assistance on plan implementation.
- The local granting process, and the elements of the project application in particular, are ways to ensure accountability for local implementation of the SDP.
- State monitoring of local projects should be viewed as part of a continuum of technical assistance.

G.8 Reflection and Application

1. What strategies for communication, training, and technical assistance should I implement (or improve) to ensure implementation of and accountability for the LOAs?
2. How can the local granting process in the MEP be strengthened to ensure accountability for achieving MPOs?
3. What support, processes, and accountability will ensure that LOAs identify and target services for PFS students?
4. Is the current local MEP monitoring process one that fosters discussion of the extent to which local programs can improve their services and that identifies areas of needed technical assistance?

G.9 Resources and Tools in Appendix G

Appendix G.1 Annotated List of Selected Migrant Education Program Websites

Appendix G.2 Template for Schedule of National and State Conferences

Appendix G.3 Texas Service Delivery Plan Guidelines for Ensuring Appropriate Delivery of Migrant Education Program Services from the 2011 Texas Migrant Education Program Service Delivery Plan

Appendix G.4 Migrant Education Program Audit Documentation List (Colorado ID&R Task Force Audit Visit Manual 2008)

Appendix G.5 Template for Local Project Monitoring Tool

Appendix G.1 Annotated List of State Selected Migrant Education Program Websites (2012)

Alaska: <http://www.eed.state.ak.us/tls/migt1/home.html>

Alaska's website explains the purpose, eligibility and services given under the MEP program. There are links at the bottom of the page that include Migrant Forms, the Comprehensive Needs Assessment, a link to the Parent Advisory Council representatives, the Service Delivery Plan, and the Migrant Program Evaluation report from 2009.

California: <http://www.cde.ca.gov/sp/me/mt/programs.asp>

The California Migrant Education Program Website has a thorough description of the program and how it is structured. The main page is broken down into these topic areas: locally developed programs, state-wide administered programs, Binational Migrant Education Program, Identification and Recruitment, the Migrant State Parent Advisory Council, Migrant Student Information Network, Mini-Corps Program, Portable Assisted Study Sequence, and the Statewide Student Leadership Institute, University of California, Los Angeles. Each of the sections either has a link to the specific program or contact information is listed for the program.

Florida: <http://www.fldoe.org/bsa/title1/doemep.asp>

Florida's website includes a large number of publications with sections broken down by topic areas. These topics include: Statutory Authority, New & Hot Topics, Evaluation, Florida Migrant Intra- and Interstate Program, Migrant Student Information eXchange, General Program information, Publications & Data, Additional Resources, and Contact Information. The evaluation section includes a Self Evaluation Annual Report Template, an Evaluation Guidebook, and 2010–2011 Migrant Education Summer Program Guidelines. The Publications section includes the Florida Migrant Education Comprehensive Needs Assessment Final Report and the Services Delivery Plan.

Idaho: http://www.sde.idaho.gov/site/migrant_edu/

Idaho's Migrant Education Program website has links to Program Information, Identification and Recruitment, the Idaho MEP State PAC, the Comprehensive Needs Assessment & State Migrant Service Delivery Plan, P.A.S.S., Reports & Documents, Resources and Links, and Migrant Student Data Collection. The Reports & Documents section includes the Idaho MEP Program Manual 2010 and LEA Migrant District Plan Guidance.

Illinois: <http://www.isbe.state.il.us/bilingual/htmls/migrant.htm>

Illinois' website is organized under English Language Learning on the State Board of Education site. The Resources area includes Migrant Teacher Resources and Migrant Recruiter Resources.

Kansas: <http://ksmigrant.org/>

The Kansas website includes the following categories: About the Kansas MEP, Contact Us, Families/Las Familias, Migrant Directory/Contacts, Kansas ID&R, Photo Galleries, Resources for Recruiters, and Web resources/links. There is an additional subsection on Programs & Initiatives, which includes these categories: CAMP Program, ConQUIR-IDR (The Consortium for Quality and Consistency in Identification and Recruitment), HEP Programs, KSDE On-Site Monitoring Review, KSDE Management Calendar,

Parent Involvement (MPAC) (i.e., the Migrant Parent Advisory Council), the Leadership Academy, Services, Quality Assurance, and Reports. The KSDE On-Site Monitoring Review section has a link to a form that is used for monitoring.

Michigan: http://michigan.gov/mde/0,1607,7-140-6530_30334_38824---,00.html

The Michigan website has the following sections: What's New, Resources, Allocations, and Grant Applications. The What's New section includes a self-assessment checklist, the 11/10/10 Migrant Education Program Evaluation, and a grant application for the ID&R Centers. Resources include FAQs on eligibility, scholarship opportunities, and a list of Migrant Program Directors. The Allocations section includes the summer and regular migrant program allocations. The Grant Applications section includes applications for both summer and regular year.

North Carolina: <http://www.dpi.state.nc.us/mep/>

North Carolina's website has links to information about the program, programs and initiatives, MEP staff resources, reports and maps, report reminder, selected links, OME monitoring documents, and the MEP directory. The reports section includes the NC Migrant Education Annual Evaluation Report for 08-09, the NC Migrant Education Program Student Profile: 2006–2009, and the 2007–2008 NCMEP Student Profile. The Programs and Initiatives page breaks down the particular programs available in North Carolina, including a Migrant Education Hotline. A link to the Service Delivery Plan is on the site as well.

Appendix G.3 Texas Service Delivery Plan Guidelines for Ensuring Appropriate Delivery of Migrant Education Program Services from the 2011 Texas Migrant Education Program Service Delivery Plan

In order to ensure that Migrant Education Program (MEP) services are delivered according to program purposes and goals, the Texas MEP is structured such that subgrantees applying for MEP funds must serve migrant children in accordance with Title I, Part C requirements and guidelines outlined in the appropriate grant application.

General program guidelines for the LEA's delivery of MEP-funded services include, but are not limited to, the following:

1. MEP funds must be used to (a) meet the identified needs of migratory children that result from their migratory lifestyle and to permit these children to participate effectively in school and meet the State's academic performance standards; and (b) address the unique needs of migratory children that **are not addressed by services available from other Federal or non-Federal programs.**
2. The LEA must provide Migrant Services Coordination by (a) determining individual needs for instructional and support services; (b) identifying available resources; (c) coordinating with entities to ensure access to appropriate resources; and (d) following up to monitor and document progress.
3. In providing MEP-funded services, the LEA must give priority to migrant children who are failing, or most at risk of failing, to meet the State's challenging State academic content and academic achievement standards, **and** whose education has been interrupted during the regular school year. These children are classified as Priority for Services (PFS).
4. Each LEA must ensure that MEP funds are used to supplement, and not supplant, services provided to migrant children.
5. The LEA's planning, implementation and evaluation of MEP activities must reflect regular, meaningful consultation with migrant parents coordinated through the district's parent advisory council (PAC).
6. To the extent possible, the LEA must provide (a) family literacy programs, such as the Texas Migrant Reading Is Fundamental (RIF) Program and/or the Building Bridges Early Childhood Program; and (b) supportive services for out-of-school youth.

Appendix G.4 Migrant Education Program Audit Documentation List (Colorado ID&R Task Force Audit Visit Manual 2008) <http://www.metaassociates.com/metafiles/AuditPacket.pdf>

1. Organizational chart of the MEP
2. Job descriptions for all MEP staff
3. Current needs assessment
4. Current program objectives
5. Description of all MEP services provided
6. List of PFS students with services provided
7. Correspondence with school districts
8. Brochures
9. Phone logs of communication with school districts
10. Contractual agreements with agencies providing services to students and families
11. Student records
12. Equipment inventory list
13. Correspondence with collaborating agencies
14. Examples of instructional practices that address home state test and curriculum requirements
15. Intra-office communication
16. Evidence of student performance in math (last two years)
17. Evidence of student performance in reading (last two years)
18. Examples of how statewide assessments are used to drive curriculum
19. Recruitment plan
20. Other documentation on recruitment
21. Description of training received by recruiters
22. Description of training received by data clerks
23. Description of training received by other staff on student records
24. Written data entry procedures
25. Evidence of monitoring of data entry by supervisors
26. Evidence that FERPA provisions are being followed
27. Random sample of COEs and reenrollment forms (see attached)
28. Brochures on program services available
29. Evidence that information on services available is being disseminated in the community
30. Re-interview plan
31. List of identified migrant students and services received
32. List of students with IEPs and services received
33. List of PAC members
34. List of PAC meetings and agendas
35. Description of training provided to PAC members
36. Description of training provided to all parents
37. Examples of communications with parents
38. Description of staff development provided to all staff providing instruction to students

39. Evidence of Staff Development Evaluation/Effectiveness
40. Class/tutoring rosters
41. Description of qualifications of each instructional staff
42. Evidence of collaboration with private schools
43. Description of services to preschool students
44. List of preschool students served
45. Examples of curriculum used to instruct preschool students
46. Description of services to out-of-school youth
47. List of out-of-school youth served
48. Examples of curriculum used to instruct out-of-school youth
49. Procedures on identifying and serving high risk students
50. Documentation on home visits, school visits, and referrals
51. Examples of output from student/family database
52. Curriculum used by tutors
53. Evidence of coordination between tutors and classroom teachers
54. List of supplies provided tutors
55. List of students taking PASS and other portable coursework
56. Evidence of Program Effectiveness\Evaluation

These documents are related to the items on the ATIMEP rubric. Please provide documents that will help the audit team evaluate your MEP.

Appendix G.5 Template for Local Project Monitoring Tool
 (Add rows as needed.)

Name and Title of Reviewer:

Date of Review:

Name and Title of LOA Staff Interviewed:

Name and Title of Others Present:

Desk Monitoring ___ Onsite Monitoring___

Title IC Compliance Element or SDP Implementation Element	Suggested Questions	LOA Evidence Provided	Comments
		<u>Written Documentation:</u> <u>LOA Interview Information:</u>	
		<u>Written Documentation:</u> <u>LOA Interview Information:</u>	
		<u>Written Documentation:</u> <u>LOA Interview Information:</u>	