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A Retrospective Look at Minnesota's Perkins IV Monitoring Process & Recommendations for Future Monitoring Efforts

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What is Program Monitoring?

The term monitoring is used to describe many similar activities. For the purposes of this review of Minnesota Perkins Monitoring, monitoring fulfills the objective of examining existing and collecting additional data that are to be compared to an explicit standard. That standard to which the monitoring is compared is rooted in the Carl D. Perkins Career & Technical Education Act of 2006. Monitoring provides information about the status and trends of Perkins implementation across the state.

How is Monitoring different from Program Evaluation or Program Approval?

Evaluation and monitoring go hand in hand. Monitoring provides for the assembly of raw data. Monitoring is a more immediate and continuous process meant to keep things on track and ensure that the right inputs are included for successful implementation of a program. Monitoring is characterized by data and information that is collected to examine specific elements of a program but not to the breadth, depth or methodological rigor of a formal program evaluation. Evaluation, on the other hand, uses various inquiry methods to make a judgment about the value or worth of a program.

Program approval is required of career and technical education programs in order to be an eligible recipient of Perkins funds pursuant to Carl D. Perkins Act Sec. 135(b)(6); MN State Rule 3505; and MnSCU Board Policy 3.36. The program approval process is designed to ensure the quality of instructional programs and compliance with state and federal requirements.

The Monitoring Process in Minnesota 2009-2013

Purpose

The Minnesota State Colleges and Universities and the Minnesota Department of Education are required to monitor local Perkins consortia to assure compliance with fiscal and management requirements of the Perkins IV Act of 2006 and Minnesota state requirements. The monitoring review provides an opportunity to not only meet compliance requirements, but also provide technical assistance, foster continuous improvement, and develops a better understanding of local performance, operations and issues facing career and technical Education (CTE), schools, and colleges. Lessons learned from monitoring visits are shared with local consortia and inform the state CTE leaders of policies and procedures that need to be modified.

Process

Monitoring Schedule

Minnesota Perkins Consortia were monitored on a rotation basis, with a consortium being monitored once in four years. State CTE staff collaborated with consortium leaders to identify the monitoring visit dates.

Monitoring Team

The Perkins monitoring team consisted of state CTE staff or other staff from the Minnesota Department of Education and the Minnesota State Colleges and Universities system. The monitoring team consisted of 4 – 6 people for each monitoring visit.

Time Period for Monitoring

Fiscal Records and programmatic information and outcomes shared during a monitoring visit were the most recently completed fiscal year. Current year operations were shared or requested on an as-needed basis.

Local Consortium Monitoring Guide

A guidebook was available to each consortium being monitored. The guide and other supporting materials (sample agenda, FAQ's, etc.) were also available on the www.cte.mnscu.edu web site. Each consortium provided evidence that the consortium was meeting the fiscal and programmatic requirements of the Carl D. Perkins Career and Technical Education Act of 2006 and Minnesota Perkins requirements. In addition state CTE staff met with and provided technical assistance to local teams as they prepared for the monitoring visit.

The Monitoring Site Visit

A monitoring visit occurred over two consecutive days. Local consortium leaders were asked to provide an overview of the consortium structure and operations at the initial session of the monitoring visit. The monitoring team reviewed assembled materials; talked with administration, staff, and faculty; and conducted an exit meeting highlighting a review of findings and recommendations. Reviewers recorded notes, observations, and information in an online web form organized by criterion.

Monitoring Report

After the completion of the monitoring visit, state CTE staff prepared a comprehensive report of findings of non-compliance, strengths and opportunities for continued improvement. The consortium was required to respond to any findings of non-compliance within the timeframe specified in the monitoring report.

Response to the Monitoring Report

If the consortium chose to respond to any other portions of the monitoring report, they needed to submit that optional response within 60 days of receipt of the report.

Lessons Learned in that Cycle

The monitoring visit process highlighted a number of lessons learned after visiting each of the 26 Minnesota Perkins Consortia during the four-year cycle.

Findings

Most visits resulted in at least one finding of non-compliance. Fiscal compliance issues were the most common area of noncompliance finding. This was often the result of the nature of fiscal operations across various institutions brought about by the consortium structure. Often, documentation and internal controls were weakest when money moved from one member of the consortium to another.

In years 2-4 of the monitoring process, findings of noncompliance related to the number of state-approved programs of study or the implementation of state-approved technical skill assessments was also a common finding of noncompliance. Sites visited during the first year of monitoring benefited because the state requirements asked a consortium to have one state-approved program of study and to implement a state-approved technical skill assessment when appropriate. Each subsequent year, the requirement for the number of state-approved programs of study and the state-approved technical skill assessments increased, making it more challenging for some consortium to comply.

Anecdotally, the move to the consortium structure in Minnesota appeared to facilitate small changes in the way CTE programs were planned and funded across the state. The consortia where the monitoring teams saw greater impact from the shift to the consortium structure universally occurred in consortia that had critical institution (e.g., superintendents, principals, presidents, chief academic officers, and deans) and community (e.g., leading employers, workforce leaders, and community leaders) decision-makers on the consortium leadership team. State CTE staff observations also confirmed that the consortium structure began, in years 2-4, to facilitate some improved communication between and among secondary teachers and postsecondary faculty when a consortium worked to identify appropriate technical skill assessments by career pathway. These observed effects require much more thorough examination, however.

Strengths of the Current Process

Using site visits as a part of the Perkins monitoring process offered a number of valuable benefits to the state's administration of Perkins and to the process of monitoring local recipients:

- It allowed state CTE staff to determine whether the program was being implemented as proposed in their approved plan.

- It allowed state CTE staff to assess whether certain program outcomes were being met.
- It allowed state CTE staff to learn about unanticipated effects of implementation, identify promising practices, and disseminate ideas to other local recipients as a way to foster improved capacity of all local recipients.

In addition, the site visits provided some benefit to local recipients as well:

- Anecdotally, local recipients often reported that the process of preparing for the site visit increased their own knowledge or awareness of the ways in which Perkins-funded activities were being implemented. From that increased knowledge and awareness, most consortia identified areas for improvement prior to the monitoring team's arrival on site.
- Monitoring team observations can contribute information from a different perspective than that of program participants and staff, thus reviewer feedback can highlight opportunities for change that is not evident in daily implementation of Perkins-funded efforts.

The strength, or value, of site visits often relies on well-structured processes for conducting the site visit, and standards or benchmarks against which evidence will be evaluated. To that end, the Minnesota Perkins Monitoring process relied on 23 criteria, drawn directly from the federal legislation or the state plan as the basis for the site visit. This helped define what programs and activities were examined as a part of the visit, and who would be involved in the site visits. An established procedure or format provided a consistent or structured way of recording observations (for example, the reviewer's checklist and monitoring criteria).

Limitations of the Current Process

Site visits, as a method of assembling and reviewing data, have known limitations. The presence of a review team is often intrusive and may directly influence what is being observed and the review team site visit may be expensive and time consuming. The Minnesota Perkins monitoring site visits certainly had those limitations. There were also a number of additional limitations of the process:

Multiple roles performed by CTE staff: Monitoring personnel should have duties that are segregated from program and fiscal management, program development, technical assistance, or any other function related directly to program administration. This separation of duties allows for independence and objectivity of the monitoring staff. Research on the use of site visits for compliance monitoring and evaluation suggests

that site visits rely heavily on the expertise of the review team.[1] Because a site visit essentially provides the reviewer's personal performance and operational recommendations, the validity of the visit is dependent on the members of the review team possessing legitimate expertise and ways of knowing. As such, the experiences and expertise of the review teams often did not prepare them to have legitimate expertise in matters they were called upon to review as a part of the monitoring visit process (e.g., a reviewer not trained or experienced in curriculum and instruction providing advice about curriculum design).

Lack of advanced preparation of CTE team attending a monitoring visit: Many site visits in this round of monitoring involved members of the review team asking questions and requesting data or information that was made available to the state via other standard reporting means. In the future, all state team members who attend any site visit should be expected to prepare for the visits by: reviewing pertinent documents like approved plans, fiscal desk audit reports, past monitoring reports, improvement plans and reports, and other related correspondence associated with the approved plan (i.e., correspondence and plans developed with CTE staff re: programs of study or technical skill assessments). If state members lack access to the information contained in APRs, state plans, performance reports, or other customary summaries, reporting and dissemination procedures should be developed to make this information available to staff involved in monitoring activities. The requests made during the site visit are often cumbersome or time-consuming for local teams to address during the visit and take up time while on-site that might be better-spent examining new information assembled for the visit.

Lack of follow-up after the visit: The report issued after a monitoring visit required follow-up of the site being monitored when a finding of noncompliance was identified. However, in many instances, other matters that were barriers to successful implementation of career and technical education were identified during the visit. The degree to which the state CTE team provided targeted follow-up or technical assistance was inconsistent. Research on site visits as a monitoring method show that the likelihood of the visit driving improvement is directly related to the degree to which post-visit support and resources are provided.[2] In many instances, consortium received limited follow-up from the review team after a site visit.

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[1] Mithcell, R. (1990). Site visits in the accreditation process of the Western Association of Schools and Colleges (WASC). *Evaluation and Research in Education*, 4: 75-79.
Lawrenz, F, et al. (2003). Evaluative Site Visits: A methodological review. *American Journal of Evaluation*, 24: 341-352.

[2] Lawrenz, F. et. al. (2002). A guide for planning and implementing site visits. Kalamazoo, MI: The Evaluation Center, Western Michigan University.

Looking Ahead: Refining the Monitoring Process

Improving Clarity Around the Purpose of Monitoring

The law requires state agencies to perform monitoring of local recipients but does not articulate a standard process for doing so. Based on the finding that the quality and consistency of record-keeping and information assembled for monitoring review was notably inconsistent across sites, it would be beneficial for the state to clarify the purpose and objectives for monitoring. Since monitoring is needed in order to comply with Federal law, it is natural to want to first decide what attributes will be measured. This impulse should be resisted. Instead, an effective monitoring protocol must be developed by first setting the monitoring objectives.

A successful monitoring effort begins with clearly stating the purposes for which you are monitoring. Monitoring is a tool designed to yield specific information: the information needed to direct Perkins administration and implementation to achieve desired outcomes. Thus, monitoring is an integral part of resource management. Good management decisions require good information. Too little information or the wrong information can result in incorrect conclusions. Too much information results in wasted time and money. The amount and kind of information must be tailored to the management objectives. Some proposed monitoring objectives for future Perkins monitoring include:

- Determine present and predict future CTE program opportunities, challenges, and threats
- Better define how high-quality CTE program operate
- Detect conditions, procedures, or factors that threaten CTE programs in time to effectively mitigate
- Identify factors that may enhance or detract from the availability of high-quality CTE programs

In a comprehensive program evaluation, questions often form the objectives and are essential to focus the process. For the purpose of Perkins monitoring, it makes sense that the state could define implementation priorities to be examined during a program year (i.e., progress in developing rigorous programs of study, the development of a collaborative leadership team and decision-making process, etc.) and ask sites to assemble evidence to speak to that guiding question. Guiding questions might look like these:

Migotsky, C., and Stake, R. (2001). An evaluation or an evaluation: CIRCE's metaevaluation of the site visits and issue papers of the ATE program evaluation. Urbana-Champaign, IL: CIRCE, University of Illinois.

Wilcox, B. (1990). Is there a role for site visits in monitoring systems? A UK perspective. Evaluation and Research in Education, 4, 81-91.

- What are the consortium's greatest strengths related to student outcomes? Greatest challenges?
- To what degree and in what ways do the consortium's plans and policies adequately support the strengths and include strategies to address the challenges?
- Who are the stakeholders involved in the consortium planning and decision-making and how do they contribute to the consortium success?
- To what degree and in what ways does the consortium engage in data driven planning and decision making?

Reduce Demands of Two-day Monitoring Visit

Now that the process outlined above has been used to monitor all 26 consortia, the state might consider a refining the process to reduce the fiscal, human resource and time demands of the two-day site visit. The assembly of evidence by local leaders for 23 criteria is incredibly time-consuming. The travel and out-of-office time is expensive for the state when a team of between 4 and 6 reviewers conduct each visit.

Selection of Sites to be Monitored

During the remaining time under Perkins IV, it is important for the state to consider how site selection will occur for future monitoring activities. Recent guidance from OVAE[3] suggests that states consider monitoring based on risk assessment (defining factors that may indicate excessive challenges to program implementation that allow the state to determine the methods and frequency of monitoring subrecipients).

Risk-based monitoring is the process frequently used to address compliance issues. This is done by identifying subrecipients that are most likely to:

- Have problems meeting goals due to program complexity
- Fail to meet Federal fiscal or programmatic requirements
- Present a greater risk simply due to the size of their award

To that end, the state might consider developing a risk assessment tool to be used to assist in determining which subrecipients to monitor each year. The risk assessment tool is used to help in determining the priority of subrecipients to be reviewed and the level of monitoring to be performed. Also, the risk assessment should be used in determining how often the subrecipient will be monitored.

The risk assessment targets areas that help identify changes critical to assessing the subrecipient's risk level, such as: financial problems that could lead to diversion of

[3] OVAE 2012 Financial Management Institute, Edward Smith - presenter

program funds; loss of essential personnel; loss of license or accreditation to operate the program; rapid growth; new activities or services; organizational restructuring; and complaints regarding program and/or fiscal operations. The state may consider the use of other information in assessing the subrecipient's risk level. OMB Circular A-133 provides guidance on evaluating subrecipient risks.

Potential risk factors to be assessed to determine sites for future visits include: program performance (Federal indicators, technical skill attainment, and adherence to approved plan), fiscal operations, and data reporting. In addition, the state may consider randomly selecting consortia to assure each subrecipient is monitored during the lifetime of the Act.

Program Performance

Sites identified for monitoring visits may be identified based on program performance – either excellent or because of identified problems. Excellent performance sites could provide valuable insight into how a consortium achieves goals and objectives in unique or innovative ways, and what effective strategies are being used that may be that replicable in other consortia. Sites identified because of problems with performance might be chosen for monitoring because the consortium is having difficulty achieving goals and objectives, there are known compliance issues or fiscal improprieties that are identified from desk audit activities or the consortium has requested or requires targeted technical assistance.

Fiscal Analysis

Perkins Monitoring must also examine a number of aspects of potential fiscal risk. Annually, a sample of consortium can be selected based on the following factors: notably higher ratio of unspent funds recaptured from a consortium, recipients which receive a large total allocation, and/or which have had Office of Management and Budget Circular A-133 Single Audit findings could be selected for a desk audit. In order for state CTE leaders to assure recipients' fiscal operations are reviewed at least once during the lifetime of the Act, additional criteria may be necessary to select consortium targeted for a fiscal desk audit.

Data Reporting

In order to apply the risk factor selection criteria, current data must be available for each recipient. Therefore, if a consortium is unable to submit data, such as enrollment figures, TSA results, or local plans and budgets, it becomes necessary for the consortium be selected for a review.

Random

Historical information, anecdotal information from employees, clients, and participants, and future changes, etc. may be appropriate in determining the subrecipient's need to be monitored.

Types and Levels of Monitoring

Based on the results of the risk assessment, a subrecipient could be assessed as being a low, medium, or high risk. These risk levels will determine which monitoring standards and procedures the monitors use.

The ***high risk*** monitoring level will include more intense testing of financial and program data and reporting. The basic objectives of high risk monitoring are:

- To test the reliability of internal controls.
- To verify that program objectives are being met.
- To assure the reliability of the subrecipient's financial and programmatic reports.
- To examine if costs and services are allowable and eligible.

Methods for conducting monitoring of a high risk subrecipient must be more intensive than methods for reviewing consortia determined to be at other risk levels. The use of site visits, quarterly performance calls and desk review, telephone interviews, and the results of a questionnaire must be combined as appropriate to assure improved performance and fiscal propriety.

The subrecipient classified as ***medium risk*** will be monitored for compliance issues focusing on allowable costs and program eligibility. The basic objectives of medium risk monitoring are:

- To verify that program objectives are being met.
- To test the reliability of the subrecipient's financial and programmatic reports.
- To test if costs and services are allowable and eligible.

The subrecipient classified as ***low risk*** will be monitored for operational changes. Low risk monitoring can be conducted by state CTE staff who might complete a desk review, conduct a limited number of phone interviews, or analyzing the results of a survey. The objective of the low risk monitoring is to identify major operational changes. Based on the desk review, the telephone interviews, or the results of the questionnaire, a determination will be made as to whether or not to revise the initial risk assessment and if additional monitoring is needed.