ITEM 124-101-R0704 ATTACHMENT

Summary of the U.S. Department of Education, Office of Vocational and Adult Education—Montana's Perkins System Monitoring Report

A. State Program Administration

Montana was commended for funding a wide variety of activities that foster distance learning as means to a more efficient use of limited resources given the size of the state and its sparse population.

B. Local Applications

Montana has developed thorough processes to review and evaluate all local applications at both the secondary and postsecondary levels. At each level of the state's delivery system, particular attention is given to those low-performing eligible recipients that need to address the development of key strategies that will give rise to higher performance results.

The report noted that while the Office of Public Instruction has an annual application in use for the allocation of Perkins funds to eligible secondary recipients, the local application does not address the elements required by the current federal legislation. Specifically Perkins requires a detailed set of descriptions and assurances for the local application, covering all aspects of the applicant's program, with particular attention given to the scope of local programs, local accountability, and the needs of special populations.

To correct this finding, the Office of Public Instruction must develop a local application that conforms to the requirements of section 134(b) of the Perkins legislation. Moreover, this new local application must necessarily serve as a revision to Montana's currently approved state plan; at a minimum, the revised local application must be implemented prior to July 1, 2005.

C. Fiscal Program Responsibility

Montana has established an appropriate system for the proper allocation of grant funds to secondary and postsecondary sub-recipients by addressing the required formulas outlined in sections 131 and 132 of Perkins. Moreover, the state has made a concerted effort to reduce the level of carryover by expending a substantial portion of its section 112(a)(1) funding during the first twelve months of grant availability.

The review of the fiscal area found that Montana needs to develop appropriate policies and procedures to ensure that maintenance of effort requirements are not only calculated in a consistent manner from one-year to the next, but that such calculations are also accurate and reliable i.e. using aggregate or per-student methodology. It also specified the need for

documentation to verify that the use of tuition and fees generated from the state's five colleges of technology are re-appropriated and expended for vocational education.

Also, OCHE and OPI will need to develop policies and procedures to ensure that the hold-harmless levels required for matching requirements of state administration are calculated correctly and are applied consistently from year to year. It must also review its financial status reports for the years in question and determine if matching expenditures are accurately reported.

(Note: data submitted by the Office of Public Instruction for inclusion in *The Montana—Carl D. Perkins Maintenance of Effort Calculation (Combined)* were corrected at the time of the monitoring visit).

D. Tech Prep Program

Montana was commended for developing a set of local articulation agreements that allow high school students to gain postsecondary Tech Prep credit for secondary coursework if secondary students complete the secondary coursework with a "B" or better, pursue their programs at the postsecondary level, and complete at least one semester of postsecondary coursework with a GPA of 2.0.

Although no findings were noted for the Tech Prep program, it was recommended that Montana consider a process to expand local consortia agreements to a statewide basis. Currently, an individual can gain Tech Prep credits only if he or she enrolls in the postsecondary institution that is part of the consortium in which the student's high school also participates. Should a high school student choose to enroll in a postsecondary institution not part of the consortium to which his or her original secondary institution belonged, no Tech Prep credits would be forthcoming at the postsecondary level.

(Note: Each student desiring to attend a postsecondary institution outside of the consortium must negotiate the awarding of Tech Prep credits individually with the respective consortium directors and institutions).

E. Accountability

The state was commended for having a comprehensive data reporting system that has the ability to track performance results to individual schools within a local eligible agency, and to individual programs of study.

It was found that the Office of Public Instruction did not report performance results for its core indicators for special populations and for the various categories of ethnicity required. To correct this finding, the Office of Public Instruction must take the necessary steps to strengthen its accountability system by collecting and reporting data that measure the degree to which special populations and the various ethnic categories are meeting established performance levels negotiated by the state. Montana must report these required data in its next consolidated annual report due December 31, 2004.