

Michigan Department of Education

Office of Career and Technical Education

# **Technical Review, Assistance, and Compliance (TRAC)**

## **Manual**

Update May 2017



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Contact: Civil Rights Coordinator  
Office of Career and Technical Education  
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Lansing, MI 48909  
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## **TRAC Process**

Please direct all questions concerning the TRAC process to:  
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# I. OVERVIEW

## A. Purpose

The Office of Career and Technical Education (OCTE) developed the Technical Review, Assistance, and Compliance (TRAC) process to meet state and federal requirements for monitoring sub-recipients. In addition, the OCTE uses the TRAC process to provide technical assistance to local district administrators, teachers, and other staff for continual improvement of state-approved career and technical education (CTE) programs. The TRAC process is designed to:

- Assure that local districts have expended state and federal funds appropriately and in compliance with laws, regulations, and policies applicable to [Carl D. Perkins federal funds and State School Aid Section 61a\(1\) funds](#)
- Review and verify accurate data collection and reporting which will result in consistent statewide data to be used for Core Performance Indicators (CPIs)
- Analyze, identify, and change policies and activities that hinder program quality and student achievement
- Ensure that equal educational opportunities are provided to all students. This includes the full opportunity to participate in programs, activities, and job opportunities as well as to benefit from services

The TRAC process also serves to identify local and regional strengths, best practices, and areas for program improvement. The TRAC process also facilitates communication and information exchange that will assist districts with such challenges as:

- Improving program quality
- Improving program linkages with state and national standards
- Increasing support for other state initiatives
- Expanding student opportunities to achieve national certification and credentials for CTE studies

## B. Process

Five visits will be conducted each year. Selection of a region for a visit is based on a risk analysis of various CTE performance factors related to:

1. Data, evaluation, and accountability
2. CTE Perkins grant activities
3. Finance
4. State-approved Classification of Instructional Programs (CIP)

The TRAC review is done in two phases. The first, called the Desk Review, is done by the OCTE staff during a period prior to the scheduled onsite visit. Regional staff must submit the following documentation through the Grant Electronic Monitoring System (GEMS) by the designate due date.

- All material for the selected CIP (see Pre-Visit Activities, CIP Selection) will be transferred by the OCTE from Navigator.
- Items labeled "DESK REVIEW/DISTRICT(Agency) DOCUMENTS" on the Data, Finance, and Grant Review Checklists located on the [OCTE](#) website ([michigan.gov/octe](http://michigan.gov/octe)) under Monitoring.

After completing the desk review of this documentation, the OCTE staff may request additional evidences be provided for review at the onsite visit. This evidence, as well as all other documentation listed on the checklists, must be made available to the OCTE TRAC team at the onsite visit.

## **II. PRE-VISIT ACTIVITIES**

### ***A. Identification, Scheduling, and Notification***

Up to five visits will be conducted each year. Selection of a region for a visit is based on a risk analysis of various CTE performance factors related to:

- CIP performance (enrollment irregularities)
- CIP Self Review Summary reports analyses (i.e., teacher certification of curriculum)
- Data quality and/or data collection issues
- Financial issues
- Grant management performance
- Perkins CPI levels
- Technical assistance request from the region

Notification of the onsite monitoring visit is sent to the Superintendent of the region's fiscal agency and the Career Education Planning Districts' (CEPD) Administrator(s) in April before the school year in which the visit will occur. The notification asks that a person be designated as the region's primary contact (Regional TRAC Liaison) for the TRAC visit, and provides information on training that will be provided to regional representatives. The OCTE TRAC Coordinator then contacts the Regional TRAC Liaison to invite them to the TRAC Training as well as select mutually agreeable onsite visit dates during the following school year.

### ***B. TRAC Onsite Training***

At least one training session is conducted annually for representatives of regional and local educational agencies selected for an onsite visit. This training is designed to review, explain, and clarify the TRAC procedures and guidelines for monitoring compliance. The OCTE sponsors a TRAC training workshop at least six weeks before the TRAC visits begin. Some of the topics covered and items reviewed at the training include:

- Details of the visit process
- Goals and objectives of the training
- Document preparation
- Clarification of areas of concern
- Document/evidence organization strategies
- Region's responsibilities
- TRAC compliance plan

The region's TRAC Liaison identifies a team of individuals to attend the TRAC Onsite Training Preparation Workshop. Details concerning participation in the training are included with the TRAC notification letter sent to the fiscal agency superintendent, with copies to the CEPD administrators, for each region. The Region Perkins Grant Coordinator(s), Region TRAC Liaison, CEPD Administrator(s), representatives from the business office, data collection personnel from each CEPD, and coordinator(s) of onsite documentation preparation must attend this training.

The training provides participants the opportunity to receive information and to converse with the OCTE staff about the various aspects of the upcoming visit. Informational materials outlining the details of the visit and the TRAC process are provided to each region.

### ***C. Program Selection***

State-approved CTE programs that generate Section 61a(1) added cost funds and/or receive federal funds are subject to selection for review as part of the TRAC process. The program selection is **not** limited to just those programs that have completed the [CIP Self-Review](http://ctenavigator.org/resources) process (<http://ctenavigator.org/resources>). The following criteria are considered when instructional programs are selected:

- Added cost funding amounts
- Current enrollment and completion data (4483)
- New program established within last five years
- New teacher for program
- Teacher certification type (i.e. AOA)
- Program accreditation/certification
- Program last visit
- OCTE program file information
- Program and building level CPI data including special populations
- Follow Up Reports (X0610)
- Previous Findings
- Geographical location

Each teacher in an instructional program must update the CIP Self-Review so that it reflects the previous school year's program information. This information, including evidence, must be updated in MCCTE Navigator by the designated due date. The OCTE staff members will transfer the information uploaded in Navigator to the GEMS.

For each selected CIP, the self-review must be electronically available by the designated due date. This allows time for communication and technical assistance during the onsite visit:

Complete and upload evidence in the CIP self-review into MCCTE Navigator in the correct compliance criteria folder for **C01, C02, C06, C10, C13, and C16**

- One review per PSN- multiple teachers should collaborate
- Make certain to update the profile page with the teacher of record's legal name, as it appears on their teaching certification(s)

### ***D. Grant Activity Selection***

The OCTE will select approximately 20% of the activities contained in the CTE Perkins application for the year to be reviewed. Regions must provide evidence of completion of these activities for desk review. These selections will be sent to the region 30 days prior to the document submission deadline.

### ***E. Desk Review and Onsite Document Organization***

Review checklists, located on the [OCTE](http://michigan.gov/octe) website ([michigan.gov/octe](http://michigan.gov/octe)), have been developed and assist in the understanding, identification, and compilation of supportive evidence/documentation for each critical element being reviewed during the TRAC visit. Materials, documents, and records are to be gathered and organized for **either** the desk

review submission or to be available onsite in the room designated for use as the "Documents Room." Documentation, with the exception of those marked "Onsite Documents," must be submitted through the GEMS.

1. Each review item is to be saved in an electronic folder with the review item number.
  - It is helpful to attach a copy of the corresponding onsite checklist to the folder.
  - Each document must be named with the appropriate checklist review item number (i.e. F01\_Board\_Policy\_Prohibiting\_Supplanting.doc).
2. Within the evidences, label (highlight and flag) each piece of evidence so that the reviewer's attention can be drawn to the parts of documents that meet the review criteria.
3. Place all evidence, supportive of a review item, in the review item's respective electronic folder.
4. Organize the folders in the order of the checklist review item codes:

*Examples:*

Review Item G01

- Label folder – G01. **Label each piece of evidence/document** with the review item that it addresses (G01). Place all evidence supportive of this item in this folder.

Review Item G02

- Label folder – G02. **Label each piece of evidence/document** with the review item that it addresses (G02). Place all evidence supportive of this item in this folder.

**If one piece of evidence is being offered as supportive documentation for more than one item, in a hard copy submission, please do the following:**

For onsite documents: For large documents, place a sheet in each applicable folder that lists the review item folder in which the original can be found. For small documents (1-10 pages), make a copy for each review item folder. If a manual or other large document is provided as evidence, mark (highlight, underline, flag) the page/or pages and paragraph that show evidence.

## ***F. Region TRAC Liaison Responsibilities***

After receiving the written visit notification, the superintendent (or designee) must identify one person to serve as the contact person for all TRAC visit communication, coordination, and organization. The Region TRAC Liaison's name, title, mailing address, telephone, and email address must be sent to the OCTE TRAC Coordinator, [Jim Whittaker](mailto:whittakerj@michigan.gov) at [whittakerj@michigan.gov](mailto:whittakerj@michigan.gov). The OCTE TRAC Coordinator and the region's TRAC Liaison will assure that all necessary arrangements for the onsite visit are done in a timely and complete manner. The Region TRAC Liaison will receive documents outlining the details of the TRAC process and recommended organization strategies during the TRAC training.

It is important to consider the size of the region while making plans and scheduling activities for the TRAC visit. In general, TRAC onsite visits are conducted in three days by the OCTE TRAC team consisting of 8-11 staff members:

- Day One – The OCTE consultants (5-6) conduct CIP reviews in local buildings and classrooms (no agenda necessary) typically in the AFTERNOON.

- Day Two – The OCTE document review team (3-5) arrives at home base; introduction meeting followed by documentation reviews; the OCTE consultants continue local program visits ALL DAY
- Day Three – The OCTE Consultants continue CIP reviews in local buildings and classroom (no agenda necessary) in the MORNING only. OCTE document review continues in the MORNING at the home base location. The OCTE TRAC team (document reviewers and program consultants) gather at home base (MID-DAY) for interviews, technical assistance meetings, document reviews, and the exit meeting

The following activities need to occur early in the planning stage so that participants have ample time to accommodate the activities within their schedules:

- Notify appropriate regional/local staff members and postsecondary partners who need to participate
- OCTE encourages the inclusion of superintendents, CTE directors, and other staff members who may be interested in or benefit from the knowledge gained during the TRAC review
- Notify appropriate regional and local staff that an onsite visit is scheduled, including program reviews that will be conducted in local buildings and classrooms; it may be helpful to send building staff a separate letter that advises them of the OCTE TRAC onsite visit, alerts them that the OCTE staff will be in the building that day, and that some building staff will be participating in the onsite visit. It is recommended that the visit be highlighted at a building staff meeting to accommodate questions and concerns
- Review the room and space requirements chart and prepare the TRAC Onsite Agenda
- Submit all desk review documentation **by the designated due date**

The Region TRAC Liaison should confer with the OCTE TRAC Onsite Coordinator before finalizing the agenda and interview schedule.

At least three weeks prior to visit, submit a draft of the agenda for Days Two and Three to the OCTE TRAC Coordinator for approval, see Appendices for a [sample agenda](#). A chart of [room/space requirements](#) should be used when planning the agenda. The following components are to be included in the agenda:

- Region number and name
- TRAC onsite visit dates
- Agency name, address, and phone number for site that will be considered “home base” for the all TRAC activities except CIP instructional program visits
- Time and room number at home base for Day Two Introduction Meeting; include all attendee’s names and titles
- Room number to be used by the OCTE document review team (Day Two and Day Three)
- Working lunch break for the OCTE staff (can be same as document review room)
- Room numbers for Data and Finance Interviews (two separate rooms); include all interviewee’s names and position titles (Day Three)
- Room number for Exit Meeting; include all attendee’s names and titles (Day Three)

### ***G. CEPD Administrator Responsibilities***

For a successful TRAC experience, the OCTE staff recommends that the CEPD administrator conduct a meeting with all building administrators and staff who will be visited during the TRAC onsite review.

To facilitate the notification and submission of information and evidence, it is essential that program teachers receive the information about the upcoming onsite visit as soon as possible so they can prepare. Building administrators need to be able to provide access to the programs and the teachers and/or any other information that the OCTE program consultant will need during the CIP onsite visit. The CIP Self-Review must be completed or updated, by the designated due date, for all teachers for the CIPs selected by OCTE staff for a CIP onsite visit.

<b>CEPD Administrator Activity Checklist</b>	
<input type="checkbox"/>	Notify teachers of selected CIP to be reviewed. The OCTE staff will work with teachers to establish the best time for the program visit on the day designated by the OCTE.
<input type="checkbox"/>	Schedule meeting to discuss the TRAC process with building administrators and staff.
<input type="checkbox"/>	Work with CIP teachers to collect information for the CIP Self-Review in Navigator; teachers should understand what is submitted and be part of the evidence collection process.
<input type="checkbox"/>	Review CIP documents to be sent to the OCTE with the teachers.
<input type="checkbox"/>	Submit documents for selected programs to Region TRAC Liaison so that the Liaison can meet the due date.
<input type="checkbox"/>	Plan for onsite visit and information

Submit documents to the **OCTE** in MCCTE Navigator or GEMS by the designated due date.

### **III. ONSITE ACTIVITIES**

#### **A. Instructional Programs (Day One, Two, and Three)**

(Day One Afternoon, Day Two All Day, Day Three Morning)

The OCTE program consultants arrive in the region and visit preselected CTE CIP classes and:

- Observe CTE classrooms
- Review documents with teachers in a separate, private room
- Review program facility and equipment (all buildings and centers, especially those operating CTE classes, are to be available to the OCTE TRAC team for site observations)
- Meet with local administrator(s) for program report out

#### **B. Introduction Meeting (Day Two)**

The Region TRAC Liaison determines the location of the overview meeting (e.g. region administrative office, ISD, etc.) and the region's participants for the meeting. The TRAC visit overview is conducted during normal working hours and should be approximately one-half hour to one hour in length.

The Region TRAC Liaison or designee begins and co-conducts the meeting with the OCTE TRAC Team Leader:

- Introduces all regional, local, and postsecondary partners present
- Provides a brief overview of regional activities
- Describes the philosophy of career and college readiness in the community

- Shares the size and demographics of the school and community population
- Discusses the type of CTE programs and related services offered

The OCTE TRAC Team Leader:

- Introduces the OCTE TRAC team members
- Explains the philosophy and intent of the review process
- Provides background information concerning the authority, components, and procedures of the TRAC process
- Provides an overview of onsite activities

The OCTE recommends that no more than twenty region/CEPD representatives of various components covered by the TRAC process attend this meeting. Prior onsite visit participants found the inclusion of representative district superintendent(s) with CTE programs to be beneficial. The OCTE TRAC Team Leader and the data, finance, and grant reviewers attend this meeting; program consultants do not attend this meeting.

### ***C. Document Review (Day Two)***

The OCTE TRAC team will review documentation at the home base location. The OCTE staff members are responsible for providing their own meals. District staff may assist with recommendations for local restaurants.

### ***D. Interviews (Day Three)***

The Region TRAC Liaison develops the interview schedule, reserves meeting rooms, as well as selects and schedules formal interviews with the following personnel:

- CEPD Administrator(s)
- Region Perkins grant coordinator (if requested)
- Business/financial officer(s) from CTE Perkins
- CTEIS data input and Follow-up Survey staff

Each CEPD is expected to be represented in all interviews. A list of the [interview questions](#) that will be asked during the onsite visit can be found in the Appendices as well on the [OCTE](#) website under Monitoring.

### ***E. Wrap-Up Meeting (Day Three)***

Before the wrap-up, the entire OCTE onsite team will meet to review the visit findings and prepare for the wrap-up. The wrap-up is the final activity of the onsite visit. It is designed to provide the following:

- OCTE staff provide an initial summary of the visit and general findings
- Timelines for the written report of findings
- Appeals process
- An opportunity for region participants to evaluate the TRAC review process

The Regional TRAC Liaison should identify and invite the local representatives to attend this meeting. The OCTE recommends that those who attended the overview be present for the wrap-up, as well as other staff members interested in the general findings of the TRAC visit. The maximum number of attendees should not exceed 20 participants. Note taking is encouraged during the wrap-up report.

## IV. Post-Visit Activities

### A. Final Report

The OCTE will summarize all review findings, recommendations, and commendations in a final report within the GEMS. This report will be sent to the superintendent of the regional fiscal agency within 45 calendar days of Day Three of the onsite visit. The report covers the data, finance, grant, and instructional programs (by program building, school program name, CIP code, and PSN). The following elements may be included for each of the criteria reviewed:

- **Findings** - a statement of fact describing what was observed:
  - **In Compliance/No Action Required** – Evidence was provided that indicated the region met the requirements or criteria
  - **Not in Compliance/Action Required** – Insufficient or no evidence was provided to indicate the region met the requirements or criteria
  - **Not Applicable** – The criteria listed does not apply to the specific grant criteria reviewed
- **Action Required** - a statement that denotes the actions needed to be taken by the district so that the CTE program comes into compliance and meets the requirements set forth in the criteria. Each “Not in Compliance” finding will have an “Action Required” that must be addressed within the compliance plan.
- **Comment(s)**: General comments, observations, or considerations provided by the OCTE staff. This is provided for informational purposes only. A district is not required to take any action or develop a compliance plan item based on these statements.
- **Commendations**: Based on the observation of the OCTE staff, this item is an exemplary practice that the OCTE wishes to acknowledge and share with other programs.

### B. Appeals Process

Michigan school districts and other clients of the Michigan Department of Education shall have access to review procedures in regard to decisions and actions taken on monitoring visits and the enforcement of reporting requirements. See Appendices for the [Appeals Process](#).

### C. Compliance Plans

Compliance Plans will be completed through the GEMS. Compliance plans are due 90 calendar days after the OCTE Onsite Report is issued. If findings are appealed, the Compliance Plan is due 60 calendar days after the appeal period expires.

The Compliance Plan will be reviewed and notification sent to the Region TRAC Liaison, within 45 calendar days, advising the region concerning the status. If the proposed compliance activities are insufficient, those specific items will be returned to the Region TRAC Liaison through the GEMS indicating which items need to be modified and the date the information is due to the OCTE. Failure to provide an acceptable compliance plan will result in the program being unapproved.

## ***D. Evidence of Completion***

Evidence of completion of the compliance plan will be submitted in accordance with the approved dates of the compliance plan activity, but no later than **June 30<sup>th</sup>**. (**Please note:** regions need not wait until June to upload the compliance evidences. The GEMS is available to upload evidences any time during or after compliance plan approval.)

The Evidence of Completion will be reviewed and notification sent to the Region TRAC Liaison, within 45 calendar days after the June 30<sup>th</sup> deadline, advising the region concerning the status. If suitable evidence is not received for CIP review items, the program may be unapproved. A recapture of funds may also occur. A letter will be sent by mail to the Fiscal Agency Superintendent. If the missing/unapproved evidence for data, finance, and grant reviews is not received, a negative adjustment or recapture of funds may result.

Upon acceptance of the compliance plan(s) and evidence(s), the OCTE will send a letter to the Fiscal Superintendent and CEPD Administrators indicating approval and that the TRAC monitoring requirements are complete.

# Appendices

Appendix A

## OCTE Acronyms

ADA	Americans with Disabilities Act
BAT	Bureau of Apprenticeship and Training
BPA	Business Professionals of America
CEPD	Career Education Planning District
CEPI	Center for Educational Performance and Information
CI	Career Initiatives
CIP	Classification of Instructional Programs
CMS	Cash Management System
CN	Course Number
CPI	Core Performance Indicators
CTE GPA	Career and Technical Education Grade Point Average
CTE	Career and Technical Education
CTEIS	Career Technical Education Information System
CTSO	Career and Technical Student Organization
DSB	Disability
DVS	Disadvantaged
EAG	Education Advisory Committee
EDP	Educational Development Plan
ELL/LEP	English Language Learner/Limited English Proficiency
EOY	End of Year
FCCLA	Family Career and Community Leaders of America
FCS	Family and Consumer Science
FFA	Future Farmers of America
GEMS	Grant Electronic Monitoring System
HOSA	Health Occupations Students of America
IDEA	Individuals with Disabilities Education Act
ISD	Intermediate School District
LEA	Local Education Agency
LRP	Long Range Plan
LTCS	Less-Than-Class-Size
MDE	Michigan Department of Education
MEGS	Michigan Electronic Grants System
MIOSHA	Michigan Occupational Safety and Health Administration
NON TRAD	Non-Traditional
OCTE	Office of Career and Technical Education
OMB	Office of Management and Budget
P IV	Perkins IV (Carl D. Perkins Career and Technical Education Act)
POS	Program of Studies
PSN	Program Serial Number
SPOPS	Special Populations (Special Pops)
SRSD	Single Record Student Database
STRA	School-to-Registered Apprenticeship
TRAC	Technical Review, Assistance and Compliance
WBL	Work Based Learning
WDB	Workforce Development Board

## CTE Legislative Mandates

### Federal Carl D. Perkins Title I (Secondary)

The Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) provides federal funding to programs to support and improve career and technical education (CTE).

The Perkins Act focuses on strengthening academics and CTE skills through high standards and curriculum integration. It also broadens professional development and technical assistance opportunities for CTE administrators and supports linking secondary and postsecondary CTE programs. Although there is flexibility for the use of funds at the local and regional level, there is a focus on accountability for all CTE students, including measures for all of the categories of special populations. While the legislation no longer provides set-aside funds for single parent and gender equity programs and services, it is anticipated that these programs and services will continue to be supported at the regional and local level through funding for special populations.

### State Aid 61a(1) Added Cost

Added cost funds are appropriated annually by the state legislature as part of the School Aid Act. These funds are intended to reimburse districts for the extra cost of providing CTE programs.

### Noncompliance Provisions

#### A. Noncompliance Conditions

For the purposes of the administration of state and federal funds, the following situations are incidences for which a school district may be found to be out of compliance with legislative regulations. All of these issues have a basis in the federal regulations for Perkins or the School Aid legislation:

- Incomplete, insufficient, or late application materials
- Onsite monitoring (TRAC) finds the district or career center out of compliance with the established guidelines
- Insufficient or no progress made toward Core Performance Indicator (CPI) levels
- Incomplete, insufficient, or late follow-up, enrollment, and other data reports
- A budget that is not approved prior to the expenditure of funds
- Incomplete, insufficient, or late narrative or financial reports
- Non-submission of the annual Single Audit Act reports
- Inappropriate use of funding
- Non-submission of individual student enrollment data for all state-approved CTE programs
- Failure to provide the Michigan Department of Education with the necessary information to reasonably carry out its function under the Act(s)

In circumstances where noncompliance has been established, state and/or federal funds may be withheld from an institution until the school district reaches compliance or funds may be recaptured from the recipient or result in a negative adjustment in state aid added cost.

#### B. Provisions for Withholding Recipient Funds

It is not the intent of the OCTE to be punitive when issues of noncompliance are found. However, Perkins legislation is clear that the OCTE must be provided with the information necessary to reasonably carry out its functions under the Act. In the event that a participating educational agency is delinquent in submitting required data to the fiscal agency, a specific request and deadline for the report, or other required data, shall be delivered in writing to the participating educational agency by the fiscal agency. If the participating educational agency is requested to return Perkins funds received for the fiscal year, they will be prohibited from receiving any such funds in the subsequent fiscal year.

Procedures for the withholding of funds for noncompliance must follow due process:

- When a noncompliance finding is identified, a telephone contact, followed by a letter from the OCTE, will be sent to the superintendent and the CTE administrator
- Within 30 calendar days of the date of the letter, the superintendent or designee is expected to review the findings and respond to the OCTE
- Within 30 calendar days of the date of the response letter, the OCTE will contact the superintendent or designee to discuss the finding, procedures, and timelines for corrective action and/or other appropriate response

## TRAC Timeline

1. Region Selection
2. Grant Activity, Fiscal Agent, and Classification of Instructional Program (CIP) Selections
3. Onsite Visit Notification
4. Onsite Visit Preparation TRAC Training
5. Document Submission:
  - a. CIP Self-Review Information (Navigator)
  - b. All district desk review documents for Data, Finance, and Grants (GEMS)
  - c. Agenda For Visit
6. State Desk Review
7. Onsite Visit Conducted:
  - a. Instructional Program reviews in local buildings and classrooms
  - b. Overview Meeting
  - c. Document Review
  - d. Facility Observations
  - e. Wrap-Up
8. OCTE Report Findings – 45 days after completed visit:
  - a. Not In Compliance/Action Required
  - b. Commendations Exemplary/Best Practices
  - c. Comments Technical Assistance/Observations
9. Appeals Process (If applicable)
10. Compliance Plan (If applicable): Due 90 days after Onsite Report is issued. If findings are appealed, the Compliance Plan is due 60 days after appeal period expires.
11. Compliance Plan Approval (If applicable)
12. Evidence Approval (If applicable)
13. Final Letter Sent

### ***State Criteria/Process for Continued Approval***

<b>Review Item</b>	<b>CIP Program Criteria</b>
C01	Program Staff: Teacher is appropriately certificated
C02	Professional Development
C06	Advisory Committee
C10	Implementation of Standards/Course Content
C13	Strategies to Eliminate Barriers to Program Access
C16	Postsecondary-Secondary Alignment/Linkages

***Description of data gathered at the state level (over a three year period):***

- The approved Career and Technical Education (CTE) program has shown improvement in CTE student achievement by program area
- The approved CTE program is serving all populations in proportion to agency enrollments
- The approved CTE program has met core performance indicator levels for placement of completers
- The approved CTE program has not exceeded acceptable class size based on enrollment records
- The approved CTE program is viable as evidenced by three years of stable or increasing enrollments
- The approved CTE program has conducted a program self review at least once in the past five-year period

## **Sample TRAC Onsite Agenda**

### **DAY ONE – DATE**

**AFTERNOON** Tuesday Afternoon CIP Review in Program Building(s)/Classroom(s)

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### **DAY TWO – DATE**

**ALL DAY** CIP Review Continues in Program Building(s)/Classroom(s)

**8:30 a.m.** OCTE Review Team Arrives

**9:00 a.m.** **Introduction Meeting and Region Overview**  
 (Please list attendees, possible attendees include: Region TRAC Liaison, CEPD Administrator(s), Region Perkins Grant Coordinator(s), etc.)

- *OCTE Review Team*
- *Name, Title*

**9:30 a.m. - 12:00 p.m.** Data, Finance, Grant document review begins

Room 1: (Please provide Room # and Floor #)  
 Finance, Data, and Grant Review OCTE Team Room

**12:00 p.m.** Working Lunch, OCTE TRAC Team

**1:00 p.m.** OCTE review continues

**2:30 p.m.** **(If needed)** OCTE meeting with the Region TRAC Liaison and CEPD Administrator. Discussion of additional document or interview needs for the review.

**3:00 p.m.** OCTE Review continues

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### **DAY THREE – DATE**

**MORNING** CIP Review continues in Program Building(s)/Classroom(s)

**8:30 a.m.** OCTE Review Team Arrives - Document review continues  
Room 2: (Please provide Room # and Floor #)  
 Finance, Data, and Grant Review OCTE Team Room

**9:00 a.m.** Interviews (Please see agenda below)  
Room 3: (Please provide Room # and Floor #)

- Finance OCTE Interviewer
- Region Interviewee(s)

Room 4: (Please provide Room # and Floor #)

- Finance OCTE Interviewer
- Data OCTE Interviewer
- Region Interviewee(s)

**Interview Schedule (Day Three – DATE)**

<b>FINANCE REVIEW - Room # and Floor #</b>	<b>DATA REVIEW - Room # and Floor #</b>
<b>9:00 a.m.</b> CTE Administrator(s)	<b>9:00 a.m.</b> CTEIS Input Staff
<b>10:00 a.m.</b> Business Office Representative(s)	<b>9:30 a.m.</b> Follow-Up Survey Staff
	<b>10:30 a.m.</b> CTE Administrator(s)

**11:30 a.m.** Working Lunch, OCTE Team All Staff Caucus

**1:00 p.m.** **(If needed)** OCTE Team Leader meets with Region TRAC Liaison and CEPD Administrator for preliminary findings before the wrap up.

**1:30 p.m.** **Wrap Up Meeting**  
 (Please list attendees, possible attendees include: Region TRAC Liaison, CEPD Administrator(s), Regional Perkins Grants Coordinator, Representatives from Business Office, Data Collection Personnel, etc.)

- *OCTE Review Team*
- *Name, Title*

### ***Room/Space Requirements Chart***

<b>Activity</b>	<b>Room Needs</b>	<b>Other Specific Requirements</b>
<p>CIP review visit at program sites</p> <p>Day One (afternoon only)</p> <p>Day Two (all day)</p> <p>Day Three (morning only)</p>	CIP review visit at program sites	Consultants will work with the teacher in the classroom or designated area within the program building(s)/classroom(s)
<p>Document Review: One room for OCTE team document review and team meeting (Day Two and Three)</p>	Seating for 12 people and contains all region onsite documents to be reviewed (Data, Finance, & Grants)	<p>Private, quiet area without interruptions that can be secured and in use for <b>two consecutive days</b> (Day Two and Day Three).</p> <p>Large table with access to power sources for laptops</p> <p>Very good lighting</p> <p>Accessibility to copier</p> <p>Available phone and <b><u>wireless internet access</u></b></p> <p>All documents: Highlighted or flagged, boxed and organized in order of TRAC review items listed on preparation sheets for documents required to be provided onsite.</p>
<p>Interviews: Two Private Interview Rooms (Day Three)</p>	Space for individual or small group interviews	<p>Private, quiet area without interruptions</p> <p>Ample seating for all participants</p>
<p>Introduction and Wrap-Up Meetings: One room (Day One and Day Three)</p>	Seating for at least 30 people	<p>Preferred room arrangement is the "round table" or "square" setting</p> <p>Private, quiet area without interruptions</p> <p>At least one writing surface</p> <p>Adequate lighting</p>

~ Sample ~

## **Interview Questions (*Data & Finance*)**

Following are the interview questions that will be asked during the onsite visit. Forms will be provided in advance and may be completed in writing prior to the interviews.

### **Data Interview Questions – CTEIS Input Staff**

1. Do you import student data from student management system(s)? (D01)
2. Who is your Michigan Student Data System (MSDS) Coordinator and who is your UIC Resolver? Do you exchange information regarding students with the Coordinator? (D02)
3. Have you used the OCTE CTEIS Data Code Manual from the public reports page on [www.CTEIS.com](http://www.CTEIS.com)? Was it helpful? Recommendations? (D02, D05)
4. Who is your CEPD CTEIS User Group representative? (D02, D05)
5. What is your process for collecting course section information? (D02, D05) What is your process for collecting student enrollment information? (D05)
6. How do you ensure that all student information is secure? (FERPA) (D08)
7. How do you obtain current phone numbers for follow-up purposes? (D01)
8. How do you obtain information on displaced homemakers and single parents, including single pregnant women? Who is responsible for identifying these students? How is this information shared with you? (D02a)
9. How do you verify the special populations information in MSDS and what procedure does your district follow to correct the special populations information in the MSDS if the information is incorrect? (Includes MSDS Characteristics and Special Education Components: Supplemental Nutrition [Fall MSDS Only], Primary Disability, Secondary Disability, IEP Date, Support Services, Program Service Code, Primary Educational Setting, Placed By Another District IEP, Special Education Exit Reason, Special Education Exit Date, Section 52 FTE, Section 53 FTE, LEP Exit Date, and LEP Re-Entry Date). (D02a)

10. What is the process for you to verify exit status in MSDS and what is your district's procedure if a student's district exit status/high school graduation status is determined to be incorrect? (D01)
  
11. If core student data (UIC, gender, DOB, first name, last name) is incorrect in CTEIS, or in the UIC Master, or the MSDS, what procedure is used to correct it? (D01)
  
12. What is your district's procedure for identifying students who exit a course section prior to the end of the term? How do you get this information? What is your district's procedure for reporting course section enter and exit dates in CTEIS? (D05)

### **Data Interview Questions – Follow-Up Survey**

1. How do you keep the follow up information secure? (D08)
  
2. How do you maintain confidentiality for CTE Follow-Up Survey responses? (D08)
  
3. What kind of training do interviewers receive? (D01)
  
4. Do you know how to find the current CTE Follow-up Interview Protocol Manual? How do you use this manual?(D01)
  
5. How many times do interviewers attempt to contact the students and/or proxies for follow-up? (D01)
  
6. How do you obtain current phone numbers for follow-up purposes? (D01)
  
7. Do instructors/staff share information about the follow-up survey with students before they leave the program? (D01)
  
8. How is information (particularly related placement) from the CTE follow-up survey disseminated/used for program improvement? (D06)

### **Data Interview Questions – CTE Administrator**

1. How do you ensure that all student information is secure? (D08)
  
2. What is the process for providing information to CTEIS data entry staff regarding segments in each course section? (D02b)
  
3. What is the process for providing information to the CTEIS data entry staff regarding student enrollment in course-sections? (D02b)

4. What is your process for checking the UICs and MSDS fields for accuracy? (D02a)
5. How do you maintain confidentiality for CTE Follow-Up Survey responses? (D08)
6. What kind of training do interviewers receive? (D01, D08)
7. Do you know how to find the current CTE Follow-up Interview Protocol Manual? How do you use this manual? (D01)
8. How many times do interviewers attempt to contact the students and/or proxies for follow-up? (D01)
9. How do you obtain current phone numbers for follow-up purposes? (D01)
10. How do you review CPI performance levels with CTE administrators, instructors, counselors, and SPOPS coordinators? (D03)
11. Describe your process for conducting technical skill assessments including use of site coordinator(s) and proctor(s)? (D01)
12. What is your district's procedure for reporting which students took the state skill assessment and accurately reporting the student scores? (D01)
13. What process does your region use to identify and accurately report secondary students in a Program of Study who: 1) enroll in postsecondary education, 2) enroll in the same field or major, and 3) complete a state or industry-recognized certification or licensure? (D04)

## **Finance Interview Questions – Business or Financial Officials**

### **FO1 – SUPPLEMENT, NOT SUPPLANT**

1. Does your district's operating budget for CTE activities include federal, state, and local funds? Who develops the CTE operating budget?
2. Did the district experience a decrease in nonfederal funding for CTE programs in the past year? If yes, describe how the decrease impacted CTE programs (e.g. staff changes, closed programs).
3. Did the district change how any CTE personnel were funded from last year? If yes, who were they and how did the funding change?

### **FO2 – PROCUREMENT**

4. Describe your district's purchasing policy and procedures from requisition to delivery:
5. How does your agency control the purchase of supplies? Can you order supplies and materials that do not require a purchase order? If so, is there a dollar limit on the amount?

### **FO3 – EXPENDITURE REVIEW**

6. How does the region develop the federal Perkins grant budget?
7. Describe the working relationship between the CTE program administrator and the business office regarding budgeting, expending funds, etc.
8. Who determines whether costs are allowable under the federal award?
9. Are there periodic financial reports, such as Perkins payroll reports, which show comparison of actual expenditures to budgeted amounts? If yes, how often? If not, why not? Are adjustments made to costs charged to federal awards if needed?
10. Fiscal Agents: What is the process for making grant reimbursements to participating districts? How do you monitor them for allowable costs and activities?
11. How do you determine when to request federal funds for reimbursement of expenditures from the Cash Management System (CMS)? Who requests funds?

## **F04 – COMPENSATION – PERSONAL SERVICES**

12. Does your district have written policies on recording time distribution for employees paid, in part, with federal funds? If yes, how do you let staff know when they have to comply with these requirements? Is there training for staff?

## **F05 – INVENTORY MANAGEMENT**

13. Describe your district's policies and procedures covering the use, management, and disposition of property purchased under federal programs?
14. How does your district define equipment? What is the dollar value required for an item to be considered equipment?
15. Do your policies and procedures distinguish between the following classes of personal property?
- Equipment – tangible personal property that costs \$5,000+ (or a lesser amount if that is the district's policy) and has a useful life of one year or longer; and
  - Other tangible personal property that does not rise to the level of equipment but which is vulnerable to theft (lap tops, desktop computers, blackberries, cell phones, etc.); and
  - Supplies that are neither of the above and are generally consumed in the course of use.
16. Does your agency require a physical inventory of equipment and reconciliation of the results with the equipment records? If yes, how often is it done? When was the last inventory completed? Does your agency require a physical inventory of other personal property?
17. How does your agency guard against the risk of loss or theft to tangible personal property?

## Appeals Process

Michigan school districts, and other clients of the Michigan Department of Education (MDE), shall have access to review procedures in regard to decisions and actions taken on monitoring visits and the enforcement of reporting requirements.

The procedures for notification and review are as follows:

1. An eligible recipient that intends to contest the MDE's action shall notify the Office of Career and Technical Education (OCTE) Director in writing within 14 calendar days of receipt of the MDE's findings. Within an additional 16 calendar days of receipt of the findings, the recipient shall submit a written request for review which shall state: (a) the finding of the Department that is in question; (b) the issues upon which the MDE's finding is challenged; and (c) all pertinent facts related thereto.
2. Upon receipt of such a request, the appropriate OCTE Director shall prepare a written reply in duplicate within 30 calendar days. Such a reply may include a change of position by the MDE or an affirmation of its original position, in whole or in part.
3. Within 14 calendar days of receipt of the reply from the MDE, the party whose appeal has been denied shall indicate whether it wishes to continue a request for review by the MDE. Such notification shall be sent to the OCTE Director. If the timing of local board of education meetings prevents the recipient's party from acting within the allotted 14 calendar days, the party shall send the OCTE Director written notification of this fact within the initial 14 calendar day period. A party providing this notification shall have a total of 30 calendar days to submit a request for continued review.
4. Within 14 calendar days of receipt of notice indicating a further review of decision, a final meeting shall be scheduled. At this time, there shall be a discussion including the challenging party, the OCTE Director, appropriate OCTE staff, and/or the Director of the MDE bureau or designee.
5. The OCTE Director or designee, may make a ruling based upon the facts presented or may convene a review panel of three members.
6. If a review panel is convened, within 14 calendar days of receipt of information and materials, the panel shall review the documentation and decision for the purpose of making one of the following recommendations to the OCTE Director:
  - a. Further review is not warranted based upon the facts presented. The review should end. Original staff decision **is supported**.
  - b. Further review is warranted based upon the facts presented. Original staff decision is **not supported**.
  - c. Further review may be unwarranted because there is an alternative solution that can be suggested to the challenging parties. Original staff decision is **not modified**.
7. The Director of the MDE bureau shall make a decision regarding the contested decision. All decisions are based on applicable laws and the policies of the MDE.

## **Web Documents** ([OCTE/Monitoring](#))

CIP Self-Review

CTE Quick Reference Guide (OCTE)

OCTE Frequently Asked Questions

TRAC Checklists

- Data
- Finance
- Grants

TRAC Interview Questions

- Data
- Finance

TRAC Manual