# U.S. Department of Education FY 2022 Improper Payment Methodology & Estimation Results for the Title I, Part A (Title I), Special Education – Grants to States (IDEA), and the Education Stabilization Fund (ESF) Programs

## Introduction

Simplifying and accelerating access to critical education program funds (including those used for disaster relief) while minimizing payment errors and the potential for fraud remains a priority of the U.S. Department of Education (Department). To this end, the Department is committed to improper payment prevention, mitigation and reduction, and it continues to strengthen payment integrity controls, develop and enhance estimation methodologies, and perform data analytics to monitor the Department’s programs and activities. Accurate improper payment estimation is essential to achieving these objectives and will continue to inform root cause analysis and corrective actions, as described in part in the [Fiscal Year (FY) 2022 Agency Financial Report (AFR).](http://www2.ed.gov/about/reports/annual/index.html)

## The Department’s Programs Susceptible to Significant Improper Payments

In FY 2022, three non-Federal Student Aid grant programs were determined to be high risk or “susceptible to significant improper payments.” According to OMB Memorandum [M-21-19](https://www.whitehouse.gov/wp-content/uploads/2021/03/M-21-19.pdf), *Transmittal of Appendix C to OMB Circular A-123, Requirements of Payment Integrity Improvement*, all programs with annual outlays greater than $10 million must be assessed for payment integrity risk at least once every 3 years. Programs whose improper payments exceed (or are likely to exceed) statutory thresholds of either $10M and 1.5% of outlays or $100M move to Phase 2 and an improper payment estimate is obtained. In FY 2022, the following Education programs met this criterion:

1. **Title I, Part A (Title I)** *(CFDA 84.010A)* - Title I, Part A (Title I) of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act (ESEA), provides financial assistance to LEAs and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging state academic standards. Federal funds are currently allocated through four statutory formulas that are based primarily on census poverty estimates and the cost of education in each state.
2. **Special Education – Grants to States, Individuals with Disabilities Education Act (IDEA)** *(CFDA 84.027)* – The IDEA program provides formula grants to assist the 50 states, the District of Columbia, Puerto Rico, the Department of the Interior, Outlying Areas, and the Freely Associated States in meeting the excess costs of providing special education and related services to children with disabilities.
3. **Education Stabilization Fund (ESF)** *(CFDA 84.425)* – On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act CARES Act was signed into law. It was a $2 trillion package of assistance measures, including $30.75 billion for an Education Stabilization Fund (ESF). The Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSA Act), was signed into law on December 27, 2020, and provided an additional $81.9 billion to the ESF. Additionally, on March 11, 2021, the American Rescue Plan (ARP) was signed into law and provided an additional $169.5 billion to the ESF. To date, eight grant programs have been created: Education Stabilization Fund Discretionary Grants; Governor’s Emergency Education Relief Fund; Elementary and Secondary School Emergency Relief Fund, Homeless Children and Youth, Emergency Assistance to Non-Public School, Outlying Areas, Bureau of Indian Education; and Higher Education Emergency Relief Fund.

## Statistically Valid Estimation Method

For each susceptible program, the Department designed a statistically valid sampling methodology and selected payment samples to estimate the percentage and dollar value of improper payments. Payment sample testing that occurred in FY 2022 was for the prior fiscal year (FY 2021) payment populations. The Department downloaded FY 2021 data for these programs from its grants management system (G5). The data were filtered by CFDA for payments greater than $0.

* For the Title I, IDEA, and ESF programs, the Department contacted each state’s program director requesting FY 2021 disbursement data from their state’s financial management system. Data was based on payment amounts distributed from the SEAs to the LEAs. For each state, the sampling frame represented the list of FY 2021 payments from which the statistical sample was selected.
* For the ESF program, disbursement data were also obtained from Institutions of Higher Education (IHEs). Data was based on payment amounts distributed by the IHE and, for each IHE, the sampling frame represented the list of FY 2021 payments from which the statistical sample was selected.

The sample design for each program was developed in accordance with sampling guidance provided in the OMB Circular A-123, Appendix C, via transmittal memo M-21-19, with the goal of obtaining a statistically valid estimate of the dollar amount and percentage of improper payments.

Once samples were selected, the Department obtained and reviewed the supporting documentation for each payment at the expenditure level. A determination was made whether there were any improper payments, noting overpayments and underpayments as well as technically improper and unknown payments. Results were analyzed by statisticians, who performed calculations from the sampled payments to produce a statistically valid estimated improper payment rate for each program, presented below.

## Title I, Part A program

Supporting documentation for Title I, Part A payments varied from state to state but included payment vouchers and invoices. As a result of testing procedures, the Department identified improper payments and unknown payments in the Title I, Part A program. The FY 2022 Title I, Part A payment error rate is **35.72** percent, or **$5,430.57** million.

### FY 2022 Title I, Part A Estimate

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Point Estimate of Improper Payment *(in millions)* | Over-Payment Improper Payment Estimate *(in millions)* | Under-Payment Improper Payment Estimate (*in millions*) | Technically Improper Payment Estimate (*in millions*) | Unknown Improper Payment Estimate *(in millions)* | Point Estimate *(as % of Population Total)* | Precision Rate *(as a % of Population Total)* based on 90% Confidence Interval |
| $5,430.57 | $24.23 | $0.01 | $699.31 | $4707.02 | 35.72% | 10.02% |

## IDEA program

Supporting documentation for IDEA payments varied from state to state but included payment vouchers and invoices. As a result of testing procedures, the Department identified improper payments and unknown payments in the IDEA program. The FY 2022 IDEA payment error rate is **26.71** percent, or **$3,117.07** million.

### FY 2022 IDEA Estimate

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| --- | --- | --- | --- | --- | --- | --- |
| Point Estimate of Improper Payment *(in millions)* | Over-Payment Improper Payment Estimate *(in millions)* | Under-Payment Improper Payment Estimate (in millions) | Technically Improper Payment Estimate (*in millions*) | Unknown Improper Payment Estimate *(in millions)* | Point Estimate *(as % of Population Total)* | Precision Rate *(as a % of Population Total)* based on 90% Confidence Interval |
| $3,117.07 | $0.003 | $0.002 | $0.00 | $3,117.69 | 26.71% | +/- 9.19% |

## ESF program

Supporting documentation for ESF payments to the grantees in this population, which consists of Institutes of Higher Education (IHEs), State Education Agencies (SEAs), Governors, and State Workforce Boards (SWBs), included payment vouchers and invoices. As a result of testing procedures, the Department identified improper payments and unknown payments in the ESF program. The FY 2022 ESF payment error rate is **12.09** percent, or **$5,956.42** million.

### FY 2022 ESF Estimate

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Point Estimate of Improper Payment *(in millions)* | Over-Payment Improper Payment Estimate *(in millions)* | Under-Payment Improper Payment Estimate (*in millions*) | Technically Improper Payment Estimate (*in millions*) | Unknown Improper Payment Estimate *(in millions)* | Point Estimate *(as % of Population Total)* | Precision Rate *(as a % of Population Total)* based on 95% Confidence Interval |
| $5,956.42 | $0.001170 | $0.00 | 15.04 | $5,941.38 | 12.09% | +/- 10.72% |

For detailed information on Title I, Part A, IDEA, and ESF improper payment estimates in FY 2022 and prior years, please visit <https://paymentaccuracy.gov>.