FLORIDA DEPARTMENT OF EDUCATION
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Office of Inspector General
Bureau of Federal Educational Programs' Title I, Part A Monitoring Process

Report # C-1718DOE-028   **February 2019**

Executive Summary

In accordance with the Department of Education's fiscal year 2018-19 audit plan, the Office of Inspector General (OIG) conducted a consulting engagement with the Bureau of Federal Educational Programs (BFEP) regarding the Title I, Part A grant monitoring process. The purpose of this consulting engagement was to assist BFEP in developing processes to effectively monitor the Title I, Part A grants in accordance with laws, rules, and regulations. BFEP is responsible for monitoring federally funded programs, including Title I, Part A, to ensure that all legally prescribed components are in place to increase student achievement. The OIG initiated a consulting engagement to analyze and advise on the controls, policies, and processes in place related to the BFEP Title I, Part A monitoring process. We reviewed risk assessments, monitoring compliance requirements, monitoring timeframes, report routing and dissemination processes, as well as the overall monitoring process for the period of July 1, 2016, through December 31, 2018. At the conclusion of our review, we provided guidance to BFEP for process improvements as presented in this report.

Scope, Objectives, and Methodology

The scope of the engagement included an examination of the Title 1, Part A grants monitoring process for the period of July 1, 2016, through December 31, 2018. The objective of this consulting engagement was to ensure BFEP effectively monitors the Title I, Part A grants in accordance with laws, rules, and regulations.

To accomplish our objectives, we reviewed applicable laws, rules, and regulations; interviewed appropriate BFEP staff; reviewed the department's policies and procedures; reviewed the monitoring process; reviewed monitoring work papers, reports, and related documents; and reviewed the annual risk assessments.

Background

The Bureau of Federal Educational Programs (BFEP) provides technical assistance, program support, and monitoring to local educational agencies (LEA) that lead to improved academic achievement outcomes for students who are disadvantaged, migrant, neglected, delinquent, at-

risk, or homeless or who attend rural and low-income schools. BFEP is responsible for monitoring federally funded programs, including Title I, Part A, to ensure that all the legally prescribed components are in place to increase student achievement.

Title I, Part A provides LEAs additional resources that help disadvantaged students gain a high-quality education and the skills to master the Florida Standards. These resources are used to provide additional teachers, professional development, extra time for teaching, parent involvement activities, and other activities designed to raise student achievement. Two models are used in Title I schools to provide these services. School-wide reform models provide all students with access to services. Targeted assistance models provide services to select students in Title I schools.

No Child Left Behind (NCLB) was enacted in 2002 to ensure that all eligible students have a fair, equal, and significant opportunity to obtain a high quality education and reach, at a minimum, proficiency on challenging state academic achievement standards and state academic assessments. The federal law provided money for extra educational assistance for low-income students in return for improvements in their academic progress.

The Every Student Succeeds Act (ESSA) was signed in 2015, replacing NCLB. ESSA seeks to grant flexibility to states regarding specific requirements of NCLB in exchange for rigorous and comprehensive state-developed plans designed to close achievement gaps, increase equity, and improve the quality of instruction. ESSA includes provisions designed to ensure success for students and schools such as:

- Advancing equity by upholding critical protections for America's disadvantaged and high-need students;
- Requiring – for the first time – that all students in America be taught to high academic standards that will prepare them to succeed in college and careers;
- Ensuring that vital information is provided to educators, families, students, and communities through annual statewide assessments that measure students' progress toward those high standards;
- Helping to support and grow local innovations – including evidence-based and place-based interventions developed by local leaders and educators – consistent with the Investing in Innovation and Promise Neighborhoods.;
- Sustaining and expanding the historic investments in increasing access to high-quality preschool; and
- Maintaining an expectation that there will be accountability and action to effect positive change in our lowest-performing schools, where groups of students are not making progress, and where graduation rates are low over extended periods of time.[1]

The U.S Department of Education allocated $813,175,159.00 in fiscal year FY 2016-17 and $856,978,077.00 in FY 2017-18 for the Title I program.

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[1] Every Student Succeeds Act – U.S. Department of Education
https://www2.ed.gov/policy/elsec/leg/esea02/pg2.html

Current Processes

Risk Assessment:

We reviewed the Title I, Part A completed risk assessments and corresponding methodology for fiscal years 2016-17, 2017-18, and 2018-19. We observed that each risk assessment contained elements of fiscal data, monitoring/audit history, and school data. However, the categories included in each risk assessment varied each year, as did the labeling of each category, the source of the data, and the scoring methodology.

Elements	16-17	17-18	18-19
Academic Coaching Allocations/ Remaining Balance	X		
Application Submission	X	X	
Comparability	X	X	
Coordinator/Leadership Experience *	X	X	X
D and F Schools	X	X	
Discretionary Factors		X	X
District Grades		X	
Drop Out Rate		X	
ELA Scores (% Level 3 & above)		X	
Graduation Rate		X	
Percentage point difference in ELA Level 3 and Above to State Average of 56%			X
Percentage point difference in Math Level 3 and Above to State Average of 60%			X
Prior Year Audit Findings*	X	X	X
Prior Year Monitoring	X		
SIG 1003 (a) Allocations/ Remaining Balance	X		
Student Enrollment (Size Alike)			X
Survey 3 Enrollment			X
Title I, Part A Allocation Previous School Year/ Remaining Balance*	X	X	X
Title I, Part A Skipped, Closed, New Schools			X
Marks the common fields across each fiscal year			

In FY 2017-18 and FY 2018-19, BFEP added discretionary risk factors to the risk assessment to factor in outlying concerns, such as media attention or direction from departmental leadership.

Per BFEP program staff, each program (Title I Part A, Title I Part C, etc.) completes individual risk assessments for their program areas. Upon completion, program staff meet to discuss the results of their individual risk assessment so they can develop a draft monitoring plan that allows them to coordinate monitoring efforts. Timeframes for risk assessment completion varied each year, and BFEP has not developed a timeline for the risk assessment process. Delays in the

completion of the risk assessment could lead to delays in completing the monitoring process causing feedback to the LEAs to be delayed significantly as described later in the report.

Risk Assessment Date by Fiscal Year			
	FY 16-17	**FY 17-18**	**FY 18-19**
Risk Assessment Completion Date	12/21/2016	1/30/2018	8/23/2018

At the conclusion of the risk assessment process, each provider received a final risk score, which BFEP used to determine the monitoring type needed. Per the BFEP website, the different monitoring types and required steps are as follows:

On-site Monitoring
• Before the on-site visit, the LEA submits answers to all review questions online.
• Before the on-site visit, the LEA uploads supporting documentation for all compliance items.
• BFEP staff reviews the LEA's documentation before the on-site.
• BFEP staff conducts face-to-face interviews while on-site in the LEA.

Desktop Monitoring
• LEA submits answers to all review questions online.
• LEA uploads supporting documentation for all compliance items.
• BFEP staff reviews the LEA's documentation off-site.
• BFEP staff conducts a conference call with the LEA to discuss the monitoring review.

Targeted Desktop Monitoring
• LEA answers review questions for select compliance items.
• LEA uploads supporting documentation for select compliance items.
• BFEP staff reviews the LEA's documentation off-site.
• The LEA participates in self-certification for all compliance items not selected.
• BFEP staff conducts a conference call with the LEA to discuss the monitoring review.

The only difference between onsite and desktop monitoring is that BFEP conducts interviews in-person during an onsite review and via telephone during desktop monitoring.

We determined that in both FY 2016-17 and FY 2017-18, the LEAs selected for monitoring and the monitoring types used did not align with the selection methods outlined in the risk assessment methodology. The FY 2016-17 risk assessment methodology did not identify which scores would determine the designation of each monitoring type; however, we noted the LEAs BFEP selected for monitoring did not receive the highest scores, and the reason for the selections were not documented.

FY 2016-17 Monitoring Selections:
• Okeechobee – Performance Review - #1 on risk assessment
• Gadsden – Desktop - #4 on risk assessment
• Hillsborough – Desktop - #6 on risk assessment
• Broward – Targeted Desktop - #7 on risk assessment

- Miami-Dade – Performance Review - #11 on risk assessment

Per the FY 2017-18 risk assessment methodology, onsite monitoring should be assigned to the two highest ranked LEAs, desktop monitoring should be assigned to the next two highest ranked LEAs, and a maximum of one targeted desktop monitoring should be assigned. The remaining LEAs were assigned to perform self-certifications. The LEAs selected for monitoring and the monitoring type used were not consistent with the instructions in the risk assessment methodology. The following LEAs were designated for onsite or desktop monitoring:

- Pasco – Onsite - #1 on risk assessment
- Lake – Onsite - #10 on risk assessment
- Hendry – Desktop - #2 on risk assessment
- Okeechobee – Desktop - #4 on risk assessment
- Baker- Desktop- #7 on risk assessment

Per the FY 2018-19 risk assessment methodology, onsite monitoring should be assigned to LEAs scoring 70 and above, desktop monitoring should be assigned to LEAs scoring between 60 and 69 points, and the remaining LEAs should be assigned self-certification. Per the FY 2018-19 risk assessment three LEAs scored over 70 and met the requirements for onsite monitoring while six LEAs scored between 60-69 points and met the requirements for desktop monitoring. We noted that, in addition to the risk assessment for FY 2018-19, BFEP submitted a second document listing risk assessment final scores. However, the final scores listed on the second document did not match the final scores listed on the risk assessment. The second document had each LEA scored 5 points higher than the risk assessment. Per the scoring on the second document, five LEAs scored over 70 and met the requirement for onsite monitoring while 10 LEAs scored between 60-69 points and met the requirements for desktop monitoring. BFEP was unable to explain the difference in the risk scores on the two documents. All 15 of the LEAs identified on the second risk assessment document with a score of 60 and above were listed on the draft monitoring schedule. We determined that BFEP does not document the reasons for the LEA monitoring selections or why the final selections do not correlate to the risk assessment results.

Recommendations

For the risk assessment to be more effective, we recommend BFEP implement consistent risk metrics and risk measurement processes from year to year. For example, the risk assessment for FY 2016-17 relied heavily on fiscal data while the following years used less fiscal information but included more school performance measures. The selected categories should continue to contain elements of fiscal data, audit/monitoring history, and school performance measures. However, we recommend the categories, sources of the data, and scoring methodology remain consistent from year to year to the maximum extent possible. This provides for better representation of where the risks lie and allows BFEP to consistently measure risks across multiple years. The discretionary risk factors category can continue to be used to capture outlying variables, such as media attention or directions by department leadership. It may also be beneficial for the risk assessment to include annual progress for the selected performance measures. An LEA, whose math and English/language art scores are above the state average but

declining from year to year, may be considered to be at higher risk than one whose scores are under the state average, but increasing from one year to the next.

Designation of monitoring types should also remain consistent each year. The LEAs selected for monitoring should align with the selection methodology and their risk assessment scores. To account for coordination with other program areas, BFEP should maintain meeting notes of the program discussions. Adding a notes field to the risk assessment itself to capture any outlying factors could also be beneficial. This will provide documentation for monitoring selections that do not match the risk assessment scores or monitoring methodology.

Selecting all LEAs over a specific score for desktop or onsite monitoring for FY 2018-19 would require the completion of 15 monitoring reviews, a number that may be unattainable. We recommend BFEP conduct an analysis of the time necessary to complete the monitoring process, identify other obligations on staff time, and base monitoring efforts on staff availability and the identified timeframes. This would allow BFEP to set attainable goals and reduce the risk that BFEP will fail to achieve the set monitoring schedule. We also recommend that BFEP assign certain staff solely to monitoring duties. This would free staff time to concentrate on the monitoring process and ensure monitoring is not delayed throughout the year.

Timeframes for risk assessment completion have varied each year. We recommend BFEP develop a consistent timeframe for the risk assessment process and desired completion dates. This timeframe should consider the coordination between program areas.

Monitoring:

BFEP conducts onsite visits, desktop monitoring, and targeted desktop monitoring annually based on the risk assessment results. Those with higher scores typically receive onsite or desktop monitoring, and the remainder of the LEAs submit a self-evaluation certification form. Working papers identify the compliance items reviewed during each monitoring.

FY 2016-2017:
In FY 2016-17, BFEP conducted monitoring of five LEAs. Miami-Dade and Okeechobee received performance reviews. During the performance reviews, BFEP reviewed how the LEAs spent funds on instructional coaching and the results of the coaching. BFEP did not release these reports to the districts and did not conduct performance reviews in the subsequent fiscal years. Gadsden and Hillsborough received desktop monitoring and Broward received targeted desktop monitoring. BFEP did not conduct any onsite visits in FY 2016-17. We noted that BFEP did not document the reason for the targeted desktop monitoring of Broward nor the reason they chose compliance item IIA-1. The remainder of the LEAs were required to complete self-evaluation certification forms by February 6, 2017. The FY 16-17 work papers identified 11 compliance items to be reviewed. We reviewed the monitoring results for Gadsden (desktop monitoring and self-certification), Broward (targeted desktop monitoring), and Citrus (self-certification), and determined that BFEP addressed all compliance items referenced in the reports for the selected LEAs.

Compliance Items Monitored in FY 16-17				
Compliance Item	**Citrus (S)***	**Gadsden(D)**	**Gadsden (S)**	**Broward (TD)**
AIA-1	√	√	√	**
AIA-2	√	√	√	**
AIA-3	**	**	**	**
AIA-4	√	√	√	**
CIA-1	√	√	√	**
DIA-1	√	√	√	**
DIA-2	**	**	**	**
HIA-1	√	√	√	**
IIA-1	√	√	√	√
KIA-1	√	√	√	**
LIA-1	√	√	√	**
* KIA-4 & KIA-6 were on the self-certification sheet, were not listed on work papers.				
** Compliance Items were marked as Not Applicable				

FY 2017-2018:

In FY 17-18, BFEP conducted monitoring of five LEAs. Baker, Okeechobee, and Hendry received desktop monitoring. Lake and Pasco received onsite monitoring. All other LEAs were required to submit completed self-evaluation certification forms by June 29, 2018. Work papers for FY 17-18 identified 11 compliance items. We reviewed the monitoring results for the three desktop and two onsite monitoring reports, along with the self-evaluation certification form for Columbia and determined that BFEP addressed all compliance items referenced in the reports.

Compliance Items Monitored in FY 17-18						
	Baker (D)	**Columbia (S)**	**Hendry (D)**	**Lake (O)**	**Okeechobee (D)**	**Pasco (O)**
AIA-2	√	√	√	√	√	√
AIA-3	**	√	**	**	**	**
AIA-4	√	√	√	√	√	√
CIA-1	√	√	√	√	√	√
DIA-1	√	√	√	√	√	√
DIA-2	**	√	**	**	**	√
HIA-1	√	√	√	√	√	√
IIA-1	√	√	√	√	√	√
KIA-1	√	√	√	√	√	√
LIA-1	√	√	√	√	√	√
MIA-1	√	√	√	√	√	√
** Compliance Items were marked as Not Applicable						

Both onsite and desktop monitoring include the same compliance items for review at the same level of detail. BFEP also collected supporting documentation in the same manner for both

onsite and desktop monitoring. We reviewed the compliance components selected by BFEP and determined that, while they were mostly consistent between FY 2016-17 and 2017-18, BFEP does not document why the compliance items are selected. We additionally determined BFEP monitoring does not include a fiscal compliance component. Per BFEP staff, fiscal components are considered during the application process.

Recommendations

We recommend BFEP document the reason for selecting compliance items to review. Additionally, when conducting targeted monitoring, BFEP should document why they selected a particular compliance item for review. If concentration on fiscal components is occurring during the application process, we recommend that BFEP staff, at a minimum, verify the LEAs spent Title I, Part A funds in accordance with the LEA's submitted application. We additionally recommend BFEP reevaluate their onsite and desktop monitoring activities to provide greater distinction between the two types of monitoring.

Technical Assistance

Per BFEP's Elementary and Secondary Education Act (ESEA) Monitoring FAQ document, "A monitoring visit is designed primarily to determine the extent of an LEA's compliance with federal program requirements, while at the same time providing technical assistance with any compliance areas. The purposes of monitoring include: (1) reviewing information from an LEA; (2) determining the need for system improvements; and (3) providing technical assistance." During the monitoring process, the BFEP team confers via phone or email with the LEAs receiving desktop or onsite monitoring. Additionally, they hold conference calls with all LEAs, prior to the monitoring activities beginning.

Recommendations

We recommend BFEP track communication with the LEAs, utilizing a call log or tracking database, and include sufficient fields to document the topic discussed, the length of call, the BFEP staff providing the technical assistance, and the guidance provided. This would allow BFEP to periodically review staff communication and ensure correct information is provided to the LEAs consistently. In the event that the BFEP staff was unavailable for future communication, additional staff would be able to review the logs and provide a consistent response. Utilizing a call log would also allow BFEP to incorporate the LEA's need for technical assistance into future risk assessments. Finally, the call log would allow BFEP management to accurately gauge how many hours each staff member spends providing technical assistance when planning the number of monitoring visits to assign to each employee.

Monitoring Process Timeliness

FY 2016-17:
In FY 2016-17, BFEP completed performance reviews for Okeechobee and Miami-Dade school districts, desktop monitoring reports for Gadsden and Hillsborough school districts, and targeted desktop monitoring for the Broward school district. BFEP directed the remaining LEAs to complete a self-certification. BFEP did not send the performance review reports to the districts.

We selected Gadsden and Broward to review the timeliness of the monitoring process. Using the milestone dates from the FY 2016-17 weekly monitoring status by program and provider log notes, the report routing sheet, and the report distribution emails, we created a timeline of the BFEP monitoring process. The timeline reflected that it took an average of 156 business days from the monitoring date to the date that the preliminary report was completed and routed for approval.

It took BFEP approximately 75 business days from the monitoring start date to complete the preliminary report and, on average, 81 business days from the date BFEP completed the preliminary report to the date BFEP routed the preliminary report for approval. The log notes did not extend past the date they completed the preliminary report so there is no record of the activity occurring during the 81 days between completion of the preliminary report and routing the report for approval.

The routing review process took approximately 45 business days. One routing form was used for all reports needing approval, including the desktop monitoring reports for Gadsden and Broward. We noted the routing form did not capture all the individuals who completed reviews nor the dates they received and reviewed the reports. In addition, the routing form did not clearly identify which reports were under review, which reports needed modifications, and the results of the review. The entire process, from monitoring to final report dissemination, took an average of 200 business days.

FY 2017-18:
In FY 2017-18, BFEP completed five monitoring reports: Hendry, Baker, Okeechobee, Lake, and Pasco. BFEP directed the remaining LEAs to complete self-certifications. Using the preliminary reports and the date of preliminary report completion, we created a timeline. On average, it took BFEP 75 business days from the monitoring date to complete the preliminary report. BFEP did not utilize the weekly monitoring status log in FY 2017-18. As of December 20, 2018, BFEP had not routed the preliminary monitoring reports for FY 2017-18 for review and approval.

FY 2018-2019:
Monitoring for FY 18-19 is currently in progress, and documentation is not yet available. BFEP provided a draft monitoring calendar.

We noted differences in the monitoring timelines across the fiscal years, notably the lack of documentation of the monitoring process. For the activities where monitoring dates were available, there was no consistency as to when BFEP completed monitoring activities. The lack of a consistent monitoring timeframe could lead to untimely monitoring of the LEAs and delayed reporting of monitoring results. As a result of the delayed reporting, BFEP will be unable to provide timely monitoring feedback to LEAs and ensure the LEAs correct the noted deficiencies in a timely manner.

Monitoring Activitiy Date by Fiscal Year			
	FY 16-17	FY 17-18	FY 18-19
Risk Assessment Completion Date	12/21/2016	1/30/2018	8/23/2018
Monitoring Start Date	2/13/2017	6/11/2018	1/22/2019
Self Certification Due Date	2/6/2017	6/29/2018	1/7/2019

Recommendations

We recommend BFEP reinstate the use of weekly monitoring status logs and expand the log to capture the entire monitoring process. The monitoring status log should identify key milestones and capture the date each milestone is completed. The log should cover the entire monitoring process, including the review, approval, and dissemination of the monitoring report.

We recommend BFEP utilize a routing form for each report and update the form to capture all the departments and individuals who are responsible for completing reviews. This will allow BFEP to document the full review process, track which reports are under review, and better document those reports with edits that may need to be rerouted. Additionally, it would allow timely dissemination of the approved reports, rather than delay dissemination on all reports while waiting for those needing edits to be finalized.

We further recommend BFEP create an annual monitoring schedule to conduct monitoring activities and identify milestones and completion date goals to fit within the schedule. This will help ensure findings and subsequent corrective actions are communicated timely and provide the maximum benefit to the LEAs and the department.

Closing Comments

The Office of the Inspector General would like to recognize and acknowledge the Bureau of Federal Educational Programs and staff for their assistance during the course of this engagement. Our fieldwork was facilitated by the cooperation and assistance extended by all personnel involved.