

Department of Education
Office of Inspector General – Internal Audit
Six-Month Status Report on: ESOL and Title III
Report # A-1516-004 Issued: March 15, 2016
Status as of September 15, 2016

Finding	Recommendation(s)	Management Response as of March 15, 2016	Management Response as of September 15, 2016	Anticipated Completion Date & Contact
<p>1. Districts did not achieve the department Annual Measurable Achievement Objectives (AMAO) goals.</p>	<p>We recommend Student Achievement through Language Acquisition (SALA), with input from high achieving districts and schools, review the districts' performance over the last four years in achieving the AMAO goals and identify best practices, determine potential methods for improving underperforming districts, and establish ambitious but achievable targets and accountability measures.</p>	<ul style="list-style-type: none"> • 1.a. Conduct conference calls with high achieving districts to receive input and assist SALA in developing best practices and determining effective methods for improving underperforming districts. Based on the input received, SALA will disseminate best practices to all districts. <i>Anticipated Completion Date: March – April 2016</i> • 1.b. Meet with SALA support team to receive feedback and suggestions on proposed. <i>Anticipated Completion Date: January-June 2016</i> • 1.c. Meet with Accountability, Research and Measurement (ARM) and the Office of Federal Programs (OFP) to develop ambitious but achievable English Language Learner (ELL) achievement targets and 	<p>1.a. SALA contacted high achieving districts based on AMAO outcomes (Alachua, Bay, Dade, Gilchrist, Glades, Nassau, Osceola, Santa Rosa, Sarasota and Seminole) and disseminated best practices to all districts through email and conference calls.</p> <p>1.b. The SALA bureau chief met with a support team of peers from the division of public schools from January through July 2016.</p> <p>1.c. The SALA bureau chief met with Jane Fletcher in ARM and with Sonya Morris in OFP to develop ambitious but achievable ELL targets and accountability measures.</p>	<p>June 2, 2016 Chane Eplin</p> <p>July 28, 2016 Chane Eplin</p> <p>June 7, 2016 Chane Eplin</p>

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		<p>accountability measures. <i>Anticipated Completion Date: February- April 2016</i></p> <ul style="list-style-type: none"> • 1.d. Communicate expectations regularly and consistently to Local Education Agencies (LEAs). <i>Anticipated Completion Date: 2016 Monthly</i> • 1.e. Update District ELL Plan template in rule to include ELL achievement focus. <i>Anticipated Completion Date: February – April 2016</i> • 1.f. Feature ELL best practice on each monthly conference call with LEAs. <i>Anticipated Completion Date: January and April 2016</i> 	<p>1.d. The SALA bureau conducted conference calls with LEAs monthly and with its advisory committee quarterly.</p> <p>1.e. The SALA bureau updated the District ELL Plan template in rule to include an achievement focus.</p> <p>1.f. The SALA bureau has featured best practices on its conference calls with LEAs.</p>	<p>July 28, 2016 Chane Eplin</p> <p>May 20, 2016 Chane Eplin</p> <p>July 28, 2016 Chane Eplin</p>
2. SALA did not ensure the districts submitted required improvement plans.	We recommend SALA develop procedures to ensure districts not meeting their goals take appropriate	<ul style="list-style-type: none"> • 2.a. Develop procedure s for follow up, corrective action and technical assistance. <i>Anticipated Completion Date:</i> 	2.a. The SALA bureau developed procedures for follow up, corrective action and technical assistance.	March 11, 2016 Chane Eplin

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	<p>corrective action, and provide technical assistance to those districts. We also recommend SALA identify and disseminate best practices used by districts that are successfully meeting the goals.</p>	<p><i>March – April 2016</i></p> <ul style="list-style-type: none"> 2.b. Develop SALA Global Monitoring Matrix indicating both evidence and progress, including English for Speakers of Other Languages (ESOL) self-monitoring and required improvement plans and SALA reports. <i>Anticipated Completion Date: January – April 2016</i> 	<p>2.b. The SALA bureau has created a document called the SALA Global Monitoring Matrix that indicates evidence and progress of all required monitoring reports and improvement plans.</p>	<p>April 25, 2016 Chane Eplin</p>
<p>3. SALA is not effectively monitoring the districts.</p>	<p>We recommend SALA develop policies and procedures in order to ensure the quality and consistency of the monitoring process. We also recommend SALA review its risk assessment methodology and ensure it more accurately reflects the risks associated with the districts.</p>	<ul style="list-style-type: none"> 3.a. Streamline Title III and ESOL monitoring processes and reports. <i>Anticipated Completion Date: January – April 2016</i> 	<p>3.a. The SALA bureau has developed a streamline document that contains both the Title III and ESOL monitoring processes. This document is currently being added to the Office of Federal Programs online monitoring system and includes rubrics for objective rating and impact items for ELL achievement and access to advanced programs.</p>	<p>June 28, 2016 Chane Eplin</p>

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		<ul style="list-style-type: none"> • 3.b. Review and improve risk analysis processes. <i>Anticipated Completion Date: January – June 2016</i> • 3.c. Develop written monitoring procedures to include protocol and rubrics to ensure consistency and fidelity in monitoring process (objective, supporting documentation and evidence-based measures). <i>Anticipated Completion Date: January – April 2016</i> 	<p>3. b. The SALA bureau has reviewed and improved its risk analysis processes.</p> <p>3.c. The SALA bureau has developed written monitoring procedures that include protocol and rubrics.</p>	<p>July 29, 2016 Chane Eplin</p> <p>March 11, 2016 Chane Eplin</p>
4. District expenditures were not supplemental.	We recommend SALA review a sample of Title III expenditure documentation in its future monitoring efforts in order to ensure funds are spent in accordance with applicable regulations. We further recommend SALA consider reviewing previous and current	<ul style="list-style-type: none"> • 4.a. Review DOE399 "Project Disbursement Report" for Title III and Immigrant recipients. <i>Anticipated Completion Date: March – August 2016</i> • 4.b. Develop a fiscal management worksheet to check Title III expenditures are 	<p>4.a. The SALA bureau has reviewed the Form DOE399 "Project Disbursement Report" for Title III and Immigrant recipients.</p> <p>4.b. The SALA bureau developed a fiscal management worksheet to</p>	<p>July 29, 2016 Chane Eplin</p> <p>March 9, 2016 Chane Eplin</p>

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	<p>expenditures for unallowable expenses, such as those identified in our audit, and require the districts to reallocate those expenses deemed unallowable.</p>	<p>allowable, reasonable and necessary according to state and federal law. <i>Anticipated Completion Date: January– June 2016</i></p> <ul style="list-style-type: none"> 4.c. Update the Title III Request for Application to reflect allowable and unallowable expenses in collaboration with the Office of Grants Management (OGM) and OFP. <i>Anticipated Completion Date: February – April 2016</i> 	<p>ensure that Title III expenditures are allowable, reasonable and necessary according to state and federal law.</p> <p>4.c. The SALA bureau updated the Title III Request for Application to reflect allowable and unallowable expenses in collaboration with the OGM and OFP.</p>	<p>June 7, 2016 Chane Eplin</p>