



Office of Inspector General
Bureau of Educator Recruitment, Development, and Retention -
Title II, Part A Monitoring Process

Report # C-1819DOE-028

September 2019

Executive Summary

In accordance with the Department of Education’s fiscal year (FY) 2019-2020 audit plan, the Office of Inspector General conducted a consulting engagement with the Bureau of Educator Recruitment, Development, and Retention (BERDR) regarding the Title II, Part A grant monitoring process. The purpose of this consulting engagement was to assist BERDR in developing processes to effectively monitor the Title II, Part A grants in accordance with laws, rules, and regulations. BERDR is responsible for monitoring Title II, Part A grants to ensure that all legally prescribed components are in place to increase student achievement. We initiated a consulting engagement to analyze and advise on the controls, policies, and processes in place related to the BERDR Title II, Part A grant monitoring process. We reviewed risk assessments, monitoring compliance requirements, monitoring timeframes, report dissemination, and the overall monitoring process for the period of July 1, 2017, through July 30, 2019.

During the scope of the consulting engagement, one BERDR employee conducted the application reviews, amendment reviews, and monitoring for the Title I, Part A grants. We reviewed the risk assessment documents and monitoring activities for FY 2017-2018 and FY 2018-2019. We attempted to compare recent risk assessments to past risk assessments to evaluate the consistency of risk elements over the years. However, we were informed that all risk assessments and monitoring documents prior to FY 2017-2018 were deleted by a previous BERDR employee. We additionally noted that BERDR did not complete the FY 2017-2018 risk assessment due to a management request to monitor two specific LEAs. The FY 2017-2018 monitoring results were distributed on June 21, 2019, and June 28, 2019.

During FY 2018-2019, BERDR staff completed a risk assessment and initiated monitoring for 12 LEAs. Four LEAs were scheduled for onsite monitoring and eight LEAs were scheduled to receive a desktop review. As of July 31, 2019, BERDR staff had not completed the monitoring activities and distributed final monitoring letters to the LEAs. Although the current Title II, Part A grant manager maintains extensive documentation of application reviews, we noted BERDR did not maintain a log of the monitoring activities. The lack of documentation hindered consulting activities. At the conclusion of our review, we provided recommendations to BERDR for process improvements as presented in this report.

Scope, Objectives, and Methodology

The scope of the engagement included an examination of the Title II, Part A grants monitoring process for the period of July 1, 2017, through June 30, 2019. The objective of this consulting engagement was to ensure BERDR effectively monitored the Title II, Part A grants in accordance with laws, rules, and regulations.

To accomplish our objectives, we reviewed applicable laws, rules, and regulations; interviewed appropriate BERDR 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 Educator Recruitment, Development, and Retention (BERDR) provides technical assistance, program support, and monitoring to local educational agencies (LEA) that lead to improved academic achievement outcomes, enhanced classroom instructional strategies that promote rigor and relevance throughout the curriculum, and students prepared for continuing education and the workforce. BERDR is responsible for monitoring state and federally funded programs, including Title II, Part A, to ensure that all legally prescribed components are in place to increase student achievement.

The Title II, Part A program is designed to provide students from low-income families and minority students with greater access to effective educators and enhance the quality of teaching and principal leadership in order to improve student achievement. The purpose of Title II, Part A is to provide grants to state educational agencies, local educational agencies, state agencies for higher education, and eligible partnerships in order to increase student academic achievement through strategies. These strategies include improving teacher and principal quality, increasing the number of highly qualified teachers in the classroom and highly qualified principals and assistant principals in schools, and holding LEAs and schools accountable for improvements in student academic achievement. LEA activities supported by Title II, Part A funds may include teacher, principal, and school leader recruitment; training; induction and mentoring; professional development; retention; and class size reduction.

The U.S Department of Education (USED) allocated \$92,743,922 in fiscal year FY 2017-2018 and \$96,873,400 in FY 2018-2019 for the Title II program. USED preliminary allocated \$102,319,387 for FY 2019-2020.

Current Processes

Risk Assessment:

Per CFR 200.331(b), “All pass through entities must evaluate each subrecipient’s risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring.”

We requested the Title II, Part A completed risk assessments and corresponding methodology for FY 2017-2018 and FY 2018-2019. Per BERDR staff, the risk assessment for FY 2017-2018 was not completed or utilized to determine monitoring activities due to a specific management monitoring request. Two LEAs received legal complaints regarding their provision of services to the local private schools. The complaints were filed with USED, and consequently, department leadership requested the LEAs receive monitoring in FY 2017-2018.

Due to the incomplete FY 2017-2018 risk assessment, we requested prior year risk assessments in order to evaluate the consistency of risk elements over the years. BERDR informed us that a former employee deleted all prior risk assessments. The lack of complete and accessible risk assessments prevented any evaluation of the consistency and effectiveness of the risk assessments.

We reviewed the FY 2018-2019 risk assessment that was completed in the fall of 2018. We noted that BERDR did not document the date they completed the risk assessment and did not develop a timeline for the risk assessment process. The FY 2018-2019 risk assessment contained elements of fiscal data, monitoring and audit history, program alignment, student achievement, and school performance data. See Table 1 for elements and Appendix A for scoring methodology.

Table 1

Elements in FY 2018-19 Risk Assessment
Last Fiscal Year Monitored Desktop
Last Fiscal Year Monitored Onsite
Monitored for Evaluations Systems 18-19
Monitored for PD Protocol 18-19
Percentage of previous FY’s unused funds
Percentage of D Schools
Percentage of F Schools
Achievement Gap Percent Difference
FY 16-17 Graduation rate.
Percent of Teachers rated as "Needing Improvement" for Previous Two School Years
Percent of Teachers rated as "Unsatisfactory" for Previous Two School Years

We noted the risk assessment included planned monitoring for associated programs (i.e. Evaluations Systems and Professional Development Protocols) managed under BERDR. Per program staff, at the time they completed the risk assessment, select districts were to be monitored by BERDR in FY 2018-2019 for Evaluations Systems and Professional Development Protocol. Ultimately monitoring did not occur due to the associated programs being redesigned.

We observed an inconsistency with the scoring in the elements for “Time Between Monitoring.” The risk assessment includes scores for desktop and onsite monitoring history separately, granting each of the categories a potential value. If an LEA had not received onsite nor desktop monitoring in eight years or more, they were given six points towards the total. If an LEA had received a desktop or onsite monitoring, they were given the score for the monitoring they received, but not for the one they did not. For example, Brevard had not received desktop or onsite monitoring in over eight years and was awarded six points, three points for each type of monitoring. In contrast, Baker received onsite monitoring in FY 2011-2012 and was awarded one point. Baker was not awarded points for desktop monitoring, despite not having an entry in that column. Consistent scoring allows for a more accurate representation of where the risks lie.

At the conclusion of the risk assessment process, each provider received a final risk score, which BERDR used to determine the monitoring type needed. LEAs accumulating 12 points or less are designated for self-certification. Desktop monitoring should be assigned to the LEAs scoring 13 or 14 points. Onsite monitoring should be assigned to the LEAs scoring 15 points or higher. See Appendix A for the scoring methodology of each element.

The FY 2018-2019 risk assessment states, “Starting with this year, the 2018-2019 school year monitoring process, Title II, Part A plans to monitor all LEAs in the state within a 7-year time period. There are 77 LEAs, so this is at least 11 LEAs per year. Onsite monitoring will be prioritized for those districts with the highest risk analysis point score.” Although stated on the risk assessment, BERDR management reported this was not an approved goal. BERDR management has not decided the number of monitoring activities they expect to complete annually.

We determined the LEAs selected for monitoring and the monitoring types used in FY 2018-2019 did not align with the selection methods outlined in the risk assessment methodology. However, there were notes in the risk assessment stating the reason for the selections.

FY 2018-2019 Onsite Monitoring Selections:

- Desoto - 14 Points
- Palm Beach - 3 Points
- SouthTech Charter - 6 Points
- Taylor - 25 Points

FY 2018-2019 Desktop Monitoring Selections:

- Escambia - 14 Points
- Florida Virtual Schools - 11 Points
- Highlands - 9 Points
- Lafayette - 6 Points
- Leon - 14 Points
- Monroe - 6 Points
- Sumter - 7 Points
- Suwanee- 6 Points

For onsite monitoring, the risk assessment notes stated that Palm Beach and SouthTech charter were selected due to program concerns, despite both scoring low on the risk assessment. Jefferson, Franklin, and Gadsden, whose scores should have required onsite monitoring, had notes explaining why they were not selected. The risk assessment included less information regarding the selection of LEAs for desktop monitoring. Desoto's monitoring was escalated from desktop to onsite. Six of the eight LEAs selected for desktop monitoring did not score high enough to be designated for desktop monitoring, but had notes stating they were being monitored in FY 2018-2019 due to not having been monitored in over eight years.

Based on the notes, BERDR placed a priority on the length of time since the last monitoring. While previous monitoring was included in the risk assessment, the score was not weighted enough to elevate the LEAs to the level requiring desktop or onsite monitoring activities. In order to ensure the selection matches the risk assessment, BERDR could consider adding a management judgement element to the risk assessment.

Recommendations:

We recommend BERDR complete and retain risk assessments on an annual basis in order to consistently and effectively determine monitoring needs. In the event that extenuating circumstances prevent BERDR from monitoring the LEAs identified for monitoring on the risk assessment, the program should document the reasons behind the changes and any pertinent information regarding the adjustment. BERDR should set an expected completion date for the risk assessment, and the actual completion date should be documented.

We recommend BERDR clarify and enhance the methodology they use to select LEAs for monitoring to ensure the selection methodology aligns with BERDR's monitoring goals and available resources. For instance, if BERDR wants to monitor all LEAs within a particular timeframe, the weight given to the element relating to the number of years since the last monitoring should be increased over other risk elements. However, if identifying and monitoring LEAs with struggling teachers is more important, then the two elements related to the percentage of struggling teachers should be weighted more heavily. Also, BERDR could add a management judgement element to the risk assessment to capture concerns that may arise with particular LEAs.

The selection methodology currently states that the type of monitoring selected for an LEA is dependent on the score they receive on the risk assessment. Because Title II is managed by a small staff, this methodology may create a situation where there are more LEAs with scores requiring desktop or onsite monitoring than they could reasonably conduct. We recommend BERDR conduct a feasibility study to determine the time necessary to complete the monitoring process; identify other obligations requiring staff time; and base monitoring efforts on staff availability and the identified timeframes. Based on the results of the feasibility study, senior management should determine the monitoring goals for the program.

We recommend adding allocation amounts as a risk assessment element. While the amount alone is not a clear indicator of risk, an LEA who could potentially misspend a larger amount would be of greater risk to the department than one of similar scoring who receives a smaller amount of funding. It may also be beneficial for the risk assessment to include annual progress for the

selected performance measures. An LEA, whose percentage of teachers scoring as Needing Improvement or Unsatisfactory is declining from year to year, may be considered to be at lower risk than one who has a lower percentage for those scores, but are increasing from one year to the next. Additionally, the scoring of risk assessment elements should be consistent. Consistent scoring allows for a more accurate representation of where the risks lie.

We recommend adding change in teacher vacancies from one fiscal year to the next as a risk assessment element. Since Title II, Part A funds are also used for teacher recruitment, an increase in teacher vacancies could indicate an LEA at risk and a need for monitoring. Previous Title II, Part A monitoring findings should also be considered as an element. An LEA previously monitored with no findings would pose a lower risk than one with substantial findings. Using the program alignment elements for the same monitoring period may not be the clearest indicator of risk. It may be more efficient to use prior monitoring activities and any subsequent findings for those LEAs to indicate risk. However, maintaining documentation of which LEAs will be monitored for other BERDR programs could still be beneficial for coordinating activities and more efficiently using limited monitoring resources.

We encourage BERDR to implement consistent risk metrics and risk measurement processes from year to year. This provides for better representation of where the risks lie and allows BERDR to consistently measure risks across years.

Monitoring:

BERDR conducts onsite visits and desktop monitoring based on the scores LEAs receive on the risk assessment. Those at higher risk receive onsite or desktop monitoring, the remainder of the LEAs submit a self-evaluation certification form. We requested policies or internal procedures regarding monitoring, and BERDR informed us that any historical documentation that may have included procedures were lost due to the deletion of files by a former employee.

BERDR staff utilized work papers that include the compliance items to be monitored. Compliance items are established by the Title II, Part A coordinator based on the Every Student Succeeds Act (ESSA)¹. Management reviews and approves the draft compliance items prior to dissemination to the LEAs. Compliance items are reviewed each year and improved upon and updated to reflect legislative changes.

For FY 2017-2018, each compliance item listed in the work papers contained four parts:

- The compliance item, including the language pulled from the No Child Left Behind Act (NCLB) and the section where the statute can be found;
- Findings, which list compliance requirements and the actions the LEA should document to show compliance;
- Reflection Questions, which require LEAs to provide an analytical response correlated to the compliance item; and

¹ Monitoring during FY 2017-2018 used school data from the 2016-2017 school year which was still under NCLB. ESSA went into effect for the 2017-2018 school year.

- Documents to Support Compliance, listing the types of documentation the LEA is to provide as evidence of compliance.

For FY 2017-2018, BERDR conducted desktop monitoring of Marion and Polk County School Districts due to specific concerns expressed by department management. The two LEAs submitted monitoring work papers through the online grants monitoring system. The remainder of the LEAs were required to complete self-evaluation certification forms by June 29, 2018. BERDR does not require the LEA's to submit supporting documentation for self-certifications. The FY 2017-2018 work papers identified ten compliance items for review. The monitoring compliance requirements focused on activities completed under NCLB legislation during the 2016-2017 school year. We reviewed the completed work papers along with the supporting documentation for both Marion and Polk. Both LEAs addressed all compliance items and submitted supporting documentation. The monitoring results were distributed on June 21, 2019, and June 28, 2019, after the other federal programs completed their monitoring activities. The monitoring for Marion County did not result in a finding. Per the monitoring letter to Polk County, a system improvement plan would be communicated with the district federal program office. The deficiency was not described in the work papers.

For FY 2018-2019, the LEAs submitted monitoring work papers directly to BERDR. During FY 2018-2019, BERDR conducted four onsite monitoring reviews and eight desktop reviews. The remainder of the LEAs were required to complete self-evaluation certification forms. The work papers for FY 2018-2019 changed from the previous fiscal year and consisted of seven compliance items and two performance tasks from the ESSA standards. The performance tasks reviewed select expenses from the program application. For the Performance Tasks, the LEA selected one expense from their FY 2017-2018 Title II application for review, and the Title II coordinator selected the second.

As of July 31, 2019, monitoring work papers submitted by the LEAs were in different stages of the review process and had not been finalized. We noted BERDR does not maintain a tracking log for monitoring, so we were unable to verify the exact status of each monitoring review. We confirmed BERDR management completed the initial document review of the onsite monitoring work papers for the four LEAs receiving onsite monitoring. Six of the eight LEAs that received desktop monitoring for FY 2018-2019 submitted work papers and supporting documentation by the December 21, 2018, deadline. Leon and Sumter County School Districts submitted their documentation January 17, 2019.

For both FY 2017-2018 and FY 2018-2019, we verified the monitoring work papers and supporting documentation aligned with standards. We noted that there was not a significant difference between onsite and desktop monitoring. Both require the submission of documentation for the same number of compliance items and require the same depth of review. The distinction between desktop and onsite monitoring is that during an onsite monitoring review, the Title II coordinator will visit the district to conduct additional interviews and conduct a focus group to discuss the activity the LEA chose for the performance task.

Recommendations:

We recommend BERDR create a formal procedure or desk guide to document steps necessary to complete Title II, Part A application and monitoring activities. We additionally recommend BERDR retain the application, risk assessment, and monitoring documents in a secure location. This could mitigate the damage caused if an employee were to delete records from the shared drive.

We additionally recommend BERDR evaluate their onsite and desktop monitoring activities to provide greater distinction between the two types of monitoring. For example, BERDR could condense the desktop monitoring procedures, in comparison to the onsite monitoring, to allow BERDR to complete more desktop reviews and meet their monitoring goals.

As a long term goal, we recommend management review applications and monitoring activities across all federal programs and evaluate whether resources can be shared to increase efficiency during the desktop and onsite monitoring. Management should also review application processing procedures to ensure consistency across programs.

Monitoring Process Timeliness

FY 2017-2018

During FY 2017-2018, BERDR received 77 applications from July 13, 2017, through November 16, 2017. Title II staff conducted the application review process from August 9, 2017, through November 22, 2017. On average, there were 26.7 business days between the submission of the application and the first review and 57.9 business days from the date of application submission to final approval. We noted that, during this time, the Title II coordinator was also processing applications for another grant. During this fiscal year, Title II used the monitoring grants system to conduct monitoring activities. Therefore, the monitoring report notification letters were sent once all the federal programs completed monitoring. The monitoring letters were distributed June 21st and 28th, 2019.

During FY 2017-2018, the LEAs submitted 96 amendments to their applications. The amendments were reviewed within an average of 2.2 business days and approved within 8.3 business days.

BERDR did not maintain a log of the monitoring process, so we were unable to determine the timeframe from completion of desktop monitoring to letter distribution.

FY 2018-2019

During FY 2018-2019, BERDR received applications from 76 LEAs from April 30, 2018, through October 1, 2018. Title II staff conducted the application review process from May 5, 2018, through December 21, 2018. On average, there were 44 business days between the submission of the application and the first review and 67 business days from the application submission date to the final approval. We noted that, during this time, the Title II coordinator was also processing applications for another grant. While awaiting the Title II application approval, seven of the LEAs

chose to submit an updated application. The Title II coordinator allowed this since the original application had not yet been reviewed.

During FY 2018-2019, the LEAs submitted 97 amendments. The amendments were reviewed within an average of 2 business days and received final approval within 8 business days.

We created a timeline of the application and amendment review processes for Title II, Part A. See Appendix A. We noted BERDR did not maintain a log of the monitoring process and had not distributed final monitoring letters to the LEAs as of July 31, 2019.

Recommendations:

We recommend BERDR amend their tracking spreadsheet to document pertinent dates within the 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 rubric and letter. This will allow BERDR to estimate how long monitoring activities will take and allow for a better assessment of time and staff availability to conduct those activities. This would also allow management to determine a goal for completion of monitoring and evaluate if the goals are met.

We additionally recommend that BERDR enable additional staff to assist with processing amendments. Site visits and desktop monitoring of LEAs occurred during the same timeframe where the majority of the amendments were being submitted and reviewed. With the program being managed by one individual, amendments could not be processed while monitoring was conducted. The volume of work could delay the monitoring process and delay the approval of the amendments.

Closing Comments

The Office of the Inspector General would like to recognize and acknowledge the Bureau of Educator Recruitment, Development and Retention 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.

To promote accountability, integrity, and efficiency in state government, the OIG completes audits and reviews of agency programs, activities, and functions. Our audit was conducted under the authority of section 20.055, F.S., and in accordance with the International Standards for the Professional Practice of Internal Auditing, published by the Institute of Internal Auditors, and Principles and Standards for Offices of Inspector General, published by the Association of Inspectors General. The consulting engagement was conducted by Melissa Melendez del Rosario and supervised by Tiffany Hurst, CIA, Audit Director.

Please address inquiries regarding this report to the OIG's Audit Director by telephone at 850-245-0403. Copies of final reports may be viewed and downloaded via the internet at <http://www.fldoe.org/ig/auditreports.asp#F>. Copies may also be requested by telephone at 850-245-0403, by fax at 850-245-9419, and in person or by mail at the Department of Education, Office of the Inspector General, 325 West Gaines Street, Suite 1201, Tallahassee, FL 32399.

Appendix A

3 points	most recently monitored 7-8 years ago	40 to 48 percent	NO	NO	10 to 19	10 to 19	Both numbers lower than 55	33 to 34%	70 to 75	15 to 19 percent	16 to 20 percent	15 to 19 percent	15 to 19 percent	12 points or below -Self
2 points	N/A	49 to 58 percent	YES	YES	N/A	N/A	N/A	35 to 39%	60 to 69	20 to 24 percent	21 to 25 percent	20 to 24 percent	20 to 24 percent	13-14 points - Desktop
1 point	Not monitored in 8+ years	59 or higher percent	N/A	N/A	20 or more	20 or more	Both numbers lower than 50	40% or above	59 or lower	25 or more percent	26 or more percent	25 or more percent	25 or more percent	15+ points - Onsite

Table 1- Sourced from [07-01-05]

Appendix B

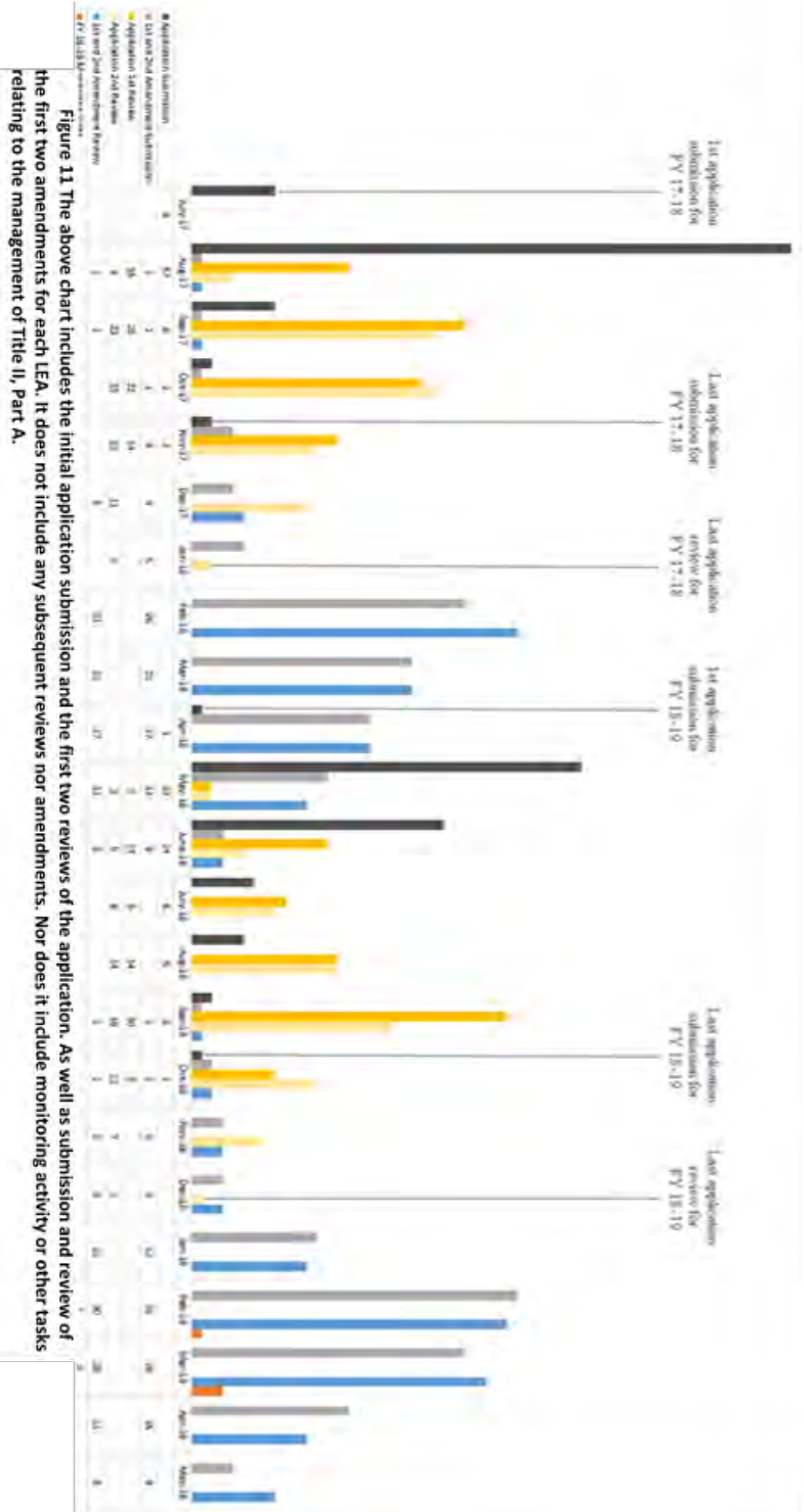


Figure 11 The above chart includes the initial application submission and the first two reviews of the application. As well as submission and review of the first two amendments for each LEA. It does not include any subsequent reviews nor amendments. Nor does it include monitoring activity or other tasks relating to the management of Title II, Part A.