

Section Ten

Monitoring and Audits

10.1 Monitoring

10.2 Audit and Audit Resolution

MONITORING

Timeline: Late Fall through early Spring

Other Resources: http://www.fldoe.org/NCLB/nclb_monitoring.asp

FDOE Contact: Jan Morphew, (850) 245-0509

Overview

The Department uses many activities to monitor compliance, including the review and approval of annual project applications and LEA Plans. In addition to these routine monitoring activities, the Department uses two types of focused monitoring activities:

1. *Self-evaluation:* Self-evaluations are conducted by each LEA using a set of documents, called work papers, to assess the LEA's level of compliance. Work papers are published each year, by each NCLB program, and are available on-line at: http://www.fldoe.org/NCLB/nclb_monitoring.asp
2. *On-site/desktop monitoring:* FDOE on-site and desktop monitoring activities are conducted annually for a subset of LEAs, either by a full, on-site visit or a remote (desktop) data review with limited, or no time spent on site. The Department conducts this monitoring as a consolidated process, meaning that most of the formula grant programs are monitored at the same time, by a single team.

LEAs and funded entities participate in the FDOE's on-site or desktop monitoring activities every five years, on a regular cycle, unless circumstances warrant more frequent monitoring. The FDOE may monitor any LEAs or other funded entities more frequently as necessary to ensure compliance with federal and state law.

Five Year Monitoring Schedule for 2006-2010

Key: D = Desktop Monitoring and OS = Onsite Monitoring

2007-2008	2008-2009	2009-2010	2010-2011	2011-2012
Wakulla (D)	UF Lab School	Bay	Escambia	Columbia
Dozier II (OS)	Miami-Dade	Washington	Santa Rosa	Baker
Dozier School (OS)	Pasco	Putnam	Gadsden	Lake
Hillsborough (OS)	Union	Jefferson	Nassau	Orange
Pinellas (D)	Bradford	Hamilton	Duval	Sarasota
Gilchrist (D)	Holmes	Manatee	Volusia	Desoto
Charlotte (D)	Calhoun	Hardee	Seminole	St. Johns
Liberty (OS)	Citrus	Highlands	Martin	FSDB
Franklin (D)	Hernando	Polk	St. Lucie	FSU Lab
FAU Lab (D)	Monroe	Gulf	Palm Beach	FAMU Lab
Levy (OS)	Collier	Jackson	Hendry	Broward
Marion (OS)	Lee	Okeechobee/Dozier	Osceola	Glades
Clay (OS)	Alachua	Taylor	Okeechobee	DOC
Indian River (OS)	Lafayette	Brevard	Madison	Okaloosa

Flagler (OS)	Dixie	Leon	Suwannee	Walton
	Sumter			

The purpose of monitoring is to ensure compliance with federal requirements. If the Department finds that an LEA is out of compliance with one or more federal requirements, the LEA must develop a system improvement plan, carry out the plan, and then submit evidence to the Department that the LEA is compliant with the requirement(s).

FLORIDA DEPARTMENT OF EDUCATION



K12: 2007-159
Date: October 31, 2007

Technical Assistance Paper

Jeanine Blomberg
Commissioner of Education



No Child Left Behind (NCLB) Monitoring of Local Education Agency Programs 2007-2008

Summary:

The Florida Department of Education (DOE) monitors federally funded programs operated by local educational agencies to fulfill its obligations under federal and state law. The purpose of monitoring is to ensure that all the legally prescribed components are in place to ensure student achievement.

This guidance explains the process that the DOE will use to monitor Local Educational Agencies (LEAs) during the 2007-08 school year.

Contact: Jan Morphew, Ed.D.
Jan.Morphew@fldoe.org

Status:

- New Technical Assistance Paper
- Revises and replaces existing Technical Assistance:
2006-2007 NCLB Monitoring of Local Education Agency Programs TAP

Issued by the
Florida Department of Education

Division of K-12 Public Schools
Office of K-12 Chancellor
<http://www.fldoe.org/bsa/title1/>

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Background

A-1. What is the legal authority for DOE's monitoring?

Education Department General Administrative Regulations (EDGAR) at 34 CFR 80.40(a) and Office of Management and Budget (OMB) Circular A-133, require the DOE to monitor sub-grant activities "to assure compliance with applicable Federal requirements and that performance goals are being achieved." Section 1008.32, Florida Statutes, addresses the responsibility of the State Board of Education for oversight and enforcement relative to compliance.

A-2. What programs will be monitored?

All programs are monitored in some form. However, this guidance refers only to the DOE's monitoring process for NCLB formula-funded programs. DOE will use the process described in this document to monitor the following programs:

- Title I, Part A, Improving Basic Programs Operated by Local Educational Agencies (LEA)
- Title I, Part A, Choice
- Title I, Part C, Education of Migratory Children
- Title I, Part D, Subpart 2, Neglected and Delinquent, Local Agency Programs
- Title II, Part A, Teacher and Principal Training and Recruiting Fund
- Title II, Part D, Enhancing Education Through Technology
- Title IV, Part A, Safe and Drug-Free Schools and Communities
- Title V, Part A, Innovative Programs
- Title VI, Part B, Subpart 2, Rural and Low-Income School Program
- Title X, Part C, Homeless Education

A-3. How are discretionary programs monitored?

The DOE monitors discretionary programs through a variety of different monitoring activities including, but not limited to, review of deliverables and regular reports, as well as frequent contact with program staff, depending on the type of program.

A-4. What is the relationship between technical assistance and monitoring?

The DOE visits LEAs and schools for a variety of purposes. A technical assistance visit is designed to provide support to an LEA. A monitoring visit is designed primarily to assist LEAs in avoiding audit findings relative to compliance of federal programs. The purposes of monitoring include: (1) review information from an LEA, (2) determination of the need for system improvements, and (3) provision of technical assistance.

A-5. What is the difference between an audit and monitoring?

Compliance monitoring and audits are closely related, but are conducted by different entities. DOE program and fiscal staff conduct compliance monitoring, while the Auditor General's Office (or independent auditors engaged by the LEA) conducts audits. Audits are typically focused on fiscal aspects of a project and the programmatic issues closely linked to fiscal requirements; monitoring activities are focused on program requirements. There is some overlap between the two activities; however, the DOE makes every effort to reduce as much redundancy as possible. It should also be noted that DOE is

responsible for resolving any findings made by the Auditor General or independent auditors (OMB Circular A-133). Results of such audits are taken into consideration as part of the monitoring activities of the DOE.

Monitoring Process

B-1. What types of monitoring does the DOE use?

The DOE uses many activities to monitor compliance, including the review and approval of annual project applications and LEA Plans. In addition to these routine monitoring activities, the DOE uses two types of focused monitoring activities: self-evaluation and DOE on-site/desktop monitoring. Self-evaluations are conducted by each LEA using a set of documents, called work papers, to assess the LEA's level of compliance. DOE on-site and desktop monitoring activities are conducted annually for a subset of LEAs, either by a full, on-site visit or a remote (desktop) data review with limited, or no time spent on site.

B-2. How often is each LEA or funded entity monitored?

LEAs and other funded entities complete a self-evaluation annually. LEAs and funded entities participate in the DOE's on-site or desktop monitoring activities every five years, on a regular cycle, unless circumstances warrant more frequent monitoring. The DOE may monitor any LEAs or other funded entities more frequently as necessary to ensure compliance with federal and state law.

B-3. Which LEAs participate in each type of monitoring?

All LEAs and funded entities annually complete the work papers for each program in which they participate. A subset of LEAs and other entities that receive funds under the programs named in A-2 will be selected each year to participate in DOE on-site and desktop monitoring activities. (See Appendix A for a list of LEAs scheduled for on-site and desktop monitoring in 2007-2008.)

B-4. Will the NCLB monitoring be coordinated with other forms of monitoring conducted by the DOE?

For LEAs that will be selected to participate in both DOE compliance monitoring and English for Speakers of Other Languages (ESOL) monitoring, the DOE will make every effort to coordinate monitoring visits for the convenience of the LEAs.

Work Papers

C-1. What is the purpose of the work papers?

The work papers are a set of compliance items for each of the programs named in A-2 above. The use of the work papers provides an opportunity for each LEA to review its own compliance. The work papers give LEAs an opportunity to align their practices and policies with federal and state requirements. The Work Papers Common Elements document is found in Appendix B.

C-2. When are the work papers due?

The completed work papers, certification and System Improvement Plans are normally due to DOE 30 calendar days from their receipt. This year, the monitoring work papers are due **November 1, 2007**; Self-Evaluation Certificates are also due from all districts on November 1, 2007. On-site work papers are due **December 3, 2007**.

C-3. How does an LEA submit its work papers?

Submission requirements vary depending on the LEA.

LEAs scheduled for on-site or desktop monitoring this year (see Appendix A) should submit their work papers electronically to Dr. Jan Morpew at Jan.Morpew@fldoe.org. LEAs must also submit the Self-Evaluation Certificate in hard copy, with an original signature. By signing this form, the Superintendent assures that the work papers are complete and accurate (see Appendix C).

LEAs not scheduled for on-site or desktop monitoring must submit the Self-Evaluation Certificate in hard copy, with an original signature to Dr. Jan Morpew, 325 W. Gaines Street, Suite 514, Tallahassee, Florida 32399. By signing this form, the Superintendent certifies that the work papers are complete and accurate (see Appendix C). (Any LEA with a System Improvement Plan from prior years should see Section E for information.)

C-4. Who must sign the Self-Evaluation Certificate?

The Superintendent must sign the Self-Evaluation Certificate. A signature on the certification represents that all the answers submitted are accurate.

C-5. Do the work papers need an original signature?

No. Only the certification must be signed.

C-6. Are the work papers on-line?

The work papers are available for download at: <http://www.fldoe.org/bsa/title1/>.

C-7. Which LEAs must complete the work papers?

All LEAs and other entities that receive formula funds under any of the programs named in A-2 must complete work papers. However, only those scheduled for desktop or on-site review must submit the work papers and supporting documentation on the CD-ROM provided to districts by DOE.

C-8. How does the DOE use the work papers?

The DOE uses the work papers for a variety of purposes. First, they are an assurance that LEAs, as the DOE's sub-grantees, are in compliance with federal and state law. Where LEAs identify areas in which they are not in compliance, the work papers help the DOE to pinpoint areas where technical assistance is needed. Work papers also allow DOE to identify LEAs' best practices. For LEAs that will be monitored with the DOE on-site or desktop monitoring processes, the monitoring team reviews the work papers to help them prepare and to minimize LEAs' workload at the time of those reviews.

C-9. Does an LEA have to complete work papers for all federal programs?

An LEA, or any other funded entity, only needs to complete work papers for the programs under which it receives funding.

C-10. Why are there no work papers for Title III?

The State of Florida is under a court order (*The Consent Decree in the League of United Latin American Citizens et al. v. The State Board of Education, 1990*) to ensure the instructional needs of non-English-speaking students and students with limited-English proficiency are met. Title III activities are a component of these critical activities, and the DOE is combining Title III monitoring with the English for Speakers of Other Languages (ESOL) program. The ESOL monitoring is explained in a separate document.

C-11. Are there major changes to the work papers from 2006-2007?

Yes. The DOE has further streamlined the work papers to reduce the response burden of LEAs and other funded entities, as well as making minor changes to the format.

C-12. How are the work papers organized?

The work papers have several different sections within each Title. They are:

Common Elements – DOE staff, in conjunction with LEA representatives, identified the common elements associated with specific requirements related to each program. This list is significantly reduced from 2006-2007. The first box on each page specifies the common element being addressed. A complete list of the common elements is included as Appendix B.

Compliance Item – The specific requirement related to the program being monitored is identified and the relevant NCLB or Florida Statutes citation is provided.

Compliance Status (LEA) – For each compliance item, the LEA must select one of the levels of compliance (see C-13) and include the initials of the staff member completing the work papers and the completion date.

Review Questions – The left-hand column specifies the types of questions or information DOE staff will be looking for during the monitoring review. This column also lists documents required for verification activities.

LEA Comments – This space is provided for the LEA to communicate additional information or comments regarding a compliance item to DOE staff.

DOE Verification Notes – This space is used by DOE staff to record comments during desktop or on-site monitoring.

C-13. What do the various levels of compliance mean?

The various levels of compliance and their definitions include:

In Compliance – the LEA has evidence to document full compliance with the requirement.

System Improvement Plan Required – all or part of the requirement is not documented as in compliance.

Not Applicable – the requirement is not applicable to the LEA being monitored. If “Not Applicable” is checked, the LEA should explain in the LEA comment box why the requirement is not applicable. (For example, an LEA with only Title I, Part A, school-wide programs would indicate that the items regarding targeted assistance programs are not applicable.) This category is not widely used with on-site monitoring, as the majority of compliance items are applicable to all LEAs.

DOE On-site and Desktop Monitoring – For each compliance item, DOE staff will check one of the following boxes and include the initials of the staff member completing the work paper and the completion date.

In Compliance – the LEA provided satisfactory documentation of full compliance with the requirement.

Partial Compliance - that the LEA satisfied a portion of the requirement. If this box is checked, the LEA will be required to prepare a System Improvement Plan to address the non-compliant portion of the requirement (see Appendix E).

Not In Compliance – means that the complete requirement is not satisfactorily met. If this box is checked, the LEA will be required to prepare a System Improvement Plan to address the non-compliant portion of the requirement (see Appendix E).

Not Applicable - means that the requirement is not applicable to the LEA being monitored. If “Not Applicable” is checked, the comments/notes sections should explain why the requirement is not applicable.

C-14. Is the LEA expected to judge whether it is in compliance with each item?

Yes. The LEA is expected to determine, for each compliance item, whether it is in full compliance, partial compliance (System Improvement Plan required), or non-compliance (System Improvement Plan required). By submitting the certification, the LEA or other funded entity is certifying that it is either fully compliant in all areas or will take action to correct those areas in which it is not fully compliant during the current school year.

C-15. Who can answer specific questions about the content of the work papers?

Appendix D contains a list of DOE program contacts. If there are specific questions about the content, e.g., what documentation is appropriate or a specific criterion, please contact the person or office listed.

C-16. Do all LEAs have to submit a complete set of work papers?

No. Only those LEAs scheduled for desktop or on-site monitoring (see Appendix A for the list) must submit a complete set of work papers. These work papers are due November 1, 2007, for those LEAs selected for a desktop review. LEAs selected to

participate in an on-site review must submit work papers to the Department by December 3, 2007.

C-17. Is there anything else that must be submitted to support the work papers?

Yes. LEAs that are scheduled for desktop and on-site monitoring must send a copy of a CD-ROM containing documents that serve as evidence to support compliance items in the work papers. LEAs scheduled for desktop monitoring should submit their CD-ROM at the same time as work papers, November 15, 2007. LEAs scheduled for on-site monitoring must submit their CD-ROM by December 3, 2007.

DOE On-Site and Desktop Monitoring

D-1. Why are on-site and desktop monitoring necessary, since each LEA is attesting to its own compliance through the work papers?

The US Department of Education (USED) has determined that having LEAs report their own levels of compliance, while a valuable part of the monitoring process, is not sufficient. The DOE is audited by the Auditor General's Office annually and monitored by USED every three years; like LEAs, the DOE provides a variety of data to the USED every year.

D-2. What is compliance monitoring?

While compliance monitoring takes many forms (see B-1) each year, approximately one-fifth of Florida's LEAs and other funded entities will be monitored intensively using a comprehensive set of compliance items established by the DOE. This is accomplished in one of two ways. For approximately half of the LEAs to be monitored each year, a team of DOE reviewers will conduct a thorough remote (desktop) monitoring process with limited, or no, on-site visits. For the remaining LEAs, a team of DOE reviewers will conduct a thorough process while on-site.

D-3. How do on-site and desktop monitoring build on the work papers?

The work papers provide a starting place for the on-site and desktop monitoring processes by allowing the DOE to review an LEA's own assessment, as well as data and other reports, in preparation for a more intensive, DOE-directed, examination.

D-4. Where can I find a list of LEAs and other funded entities to be monitored via on-site each year?

A list is available in Appendix A. This list was developed to ensure that each LEA or funded entity is monitored via on-site or desktop procedures at least once every five years. However, the DOE may monitor more frequently as necessary to ensure compliance.

D-5. How are LEAs selected for desktop monitoring or on-site visits?

The DOE selects LEAs for desktop monitoring or on-site visits from the list of LEAs and other funded entities to be monitored in 2007-08, based on the DOE's review of data, including student achievement, highly qualified teacher status, School Environmental Safety Incident Report (SESIR), the previous year's work papers, and other sources of data on LEAs performance. This selection process is called "risk-based" monitoring.

D-6. When will LEAs scheduled for monitoring be notified if they will be desktop or on-site?

The deadline for notifying LEAs scheduled for desktop or on-site monitoring is October 15, 2007.

D-7. What does a desktop monitoring process involve?

During the desktop monitoring process, a team from the DOE representing the range of federal programs that are funded in the LEA will review the work papers and documentation provided to DOE. Monitoring begins with an entrance conference call between the DOE and LEA personnel during which the scope of the desktop monitoring will be explained. During the monitoring activity, DOE may request phone conference calls with a range of LEA personnel, as well as additional documentation. Members of the DOE team will work with the LEA before the activity to establish a schedule that covers all necessary activities. Every effort will be made to coordinate phone interviews to accommodate the schedule of LEA personnel. The process ends with an exit interview to discuss preliminary findings and timelines for reports. In some cases, the DOE may wish to follow-up with a site visit to interview additional LEA personnel or review additional documents.

D-8. How long does a desktop monitoring process take?

Desktop monitoring is designed to take place within one continuous work week and is planned in cooperation with LEA personnel. Often desktop monitoring does not require a full week.

D-9. How should an LEA prepare for desktop monitoring?

The DOE requests that each LEA select a single point-of-contact to coordinate the monitoring components. By November 1, 2007, the LEA must provide a copy of all evidence that support the work papers on CD-ROM to Dr. Jan Morphew, 325 W. Gaines Street, Suite 514, Tallahassee, Florida 32399. Each LEA should also carefully read the review questions in the work papers and make personnel available who can address these questions. Each LEA to be monitored will receive specific correspondence from DOE regarding monitoring requirements.

D-10. Are non-DOE personnel involved in desktop monitoring?

No.

D-11. Who participates in a desktop monitoring process?

The DOE team will coordinate each phone call with the LEA point person. In general, the following individuals should plan on being available during desktop monitoring:

District Staff

- Superintendent (or Designee)
- NCLB/Federal Program Coordinators
- Finance Officer
- Assessment Coordinator
- MIS Coordinator
- Curriculum Coordinator
- Exceptional Student Education Coordinator

- Certification Coordinator
- Staff Development Coordinator
- Student Services Director
- Other staff as needed

Others

- Supplemental Educational Services Providers

D-12. What does an on-site monitoring visit involve?

During an on-site monitoring visit, a team from the DOE will visit the LEA. Members of the team represent the range of federal programs that are funded in the LEA. The visit begins with a meeting between members of the DOE team and LEA personnel during which the scope of the visit will be explained. While on-site, the DOE team will interview a range of LEA personnel, parents, private school personnel, and vendors. The team will request and review documents. In addition, they will visit schools, observe classrooms, and project activities. The visit ends with an exit interview to discuss preliminary findings and timelines for reports.

D-13. Are non-DOE personnel involved in an on-site monitoring visit?

Yes. The Department plans to continue to train and use LEA staff as peer monitors. Interested persons should contact Dr. Jan Morphey at Jan.Morphey@fldoe.org if they would like to be a part of a monitoring team by November 1, 2007.

D-14. What LEA personnel participate in the on-site visit?

The DOE team will coordinate each interview with the LEA point person. In general, the following individuals should plan on being available during an on-site visit.

District Staff

- Superintendent (or designee)
- NCLB/Federal Program Coordinators
- Finance Officer
- Assessment Coordinator
- MIS Coordinator
- Curriculum Coordinator
- Exceptional Student Education Coordinator
- Certification Coordinator
- Staff Development Coordinator
- Student Services Director
- Other staff as needed

School Staff

- Principal (or Designee)
- Instructional Staff
- Paraprofessionals
- Guidance Personnel

Others

- Representatives from private schools receiving services through NCLB Programs
- Parents
- Supplemental Educational Services Providers

D-15. Does the LEA have to make arrangements with supplemental service providers for on-site monitoring visit?

No. The DOE will contact supplemental education service providers directly.

D-16. How long is the DOE team in the district during an on-site visit?

On-site monitoring visits are designed to take place within one continuous work week whenever possible, and are planned in cooperation with LEA personnel. Often these visits do not require a full week.

D-17. How should an LEA prepare for an on-site visit?

The DOE requests that each LEA select a single point-of-contact to coordinate the visit. By December 3, 2007, the LEA is expected to provide a copy of all evidence to support the work papers on CD-ROM. Before the visit, the LEA should consult the document lists in the work papers to prepare the CD-ROM; paper copies of documents must also be readily available in a central location during the site visit. The LEA should also carefully read the review questions in the work papers and make personnel available who can address these questions. LEAs to be monitored will receive specific correspondence from DOE regarding the visit and requirements.

D-18. What can an LEA expect after desktop or on-site monitoring?

After the end of a desktop monitoring or on-site visit, the DOE team will assemble a preliminary monitoring report. The preliminary report, which must undergo several levels of DOE review, should be sent to the Superintendent within 30 workdays. The preliminary report will identify areas of compliance, partial compliance, and non-compliance, as well as any recommendations. The preliminary report will also indicate the items for which System Improvement Plans must be developed and any required fiscal adjustments. The Reporting and Follow-up Section (Section E) provides detail on requirements that follow the preliminary report.

Reporting and Follow-up**E-1. May an LEA request reconsideration of findings of partial or non-compliance?**

Yes. An LEA may request reconsideration of any findings within 10 work days of receiving the preliminary report. Requests for reconsideration should be submitted, in writing, to Dr. Jan Morphew, 325 W. Gaines Street, Suite 514, Tallahassee, Florida 32399.

E-2. What must an LEA do after it receives a report identifying one or more areas of partial or non-compliance?

If the LEA does not request reconsideration of findings, the report becomes final; the LEA must develop and provide a System Improvement Plan to DOE within 10 working days after the receipt of the report, acknowledging that the findings of partial or non-

compliance are correct and agreeing to correct these findings. A System Improvement Plan template, instructions, and a completed sample are found in Appendix E.

E-3. Is there a final report?

Yes. After the DOE has resolved any requests for reconsideration, it will issue a final report. Final reports will include any changes made in response to the request for reconsideration and any additional evidence provided to DOE. The LEA must submit a System Improvement Plan to DOE within 10 working days after the receipt of the preliminary report. All reports are public record and available for public review consistent with Florida's *Government in the Sunshine* laws and rules.

E-4. What should be included in the System Improvement Plans?

System Improvement Plans should provide the specific steps the LEA will take to come into compliance, including anticipated timelines. These should serve as a comprehensive "plan of action," outlining the key components of the necessary system improvements that will ensure compliance with federal requirements. A sample System Improvement Plan is provided for the Title I, Part A compliance item pertaining to the annual evaluation of the LEA parent involvement policy in Appendix E.

E-5. When are System Improvement Plans due?

System Improvement Plans are due 10 working days after receipt of preliminary report.

E-6. Does the DOE check to see if the findings have been addressed?

Yes. Evidence that each System Improvement Plan from the previous year has been implemented must be sent on November 1, 2007, or earlier if applicable. Based on the gravity of the findings, the DOE may establish additional reporting schedules that may, at DOE discretion, involve follow-up visits to the LEA to verify that the findings have been corrected.

E-7. How should evidence be submitted?

Evidence should be submitted electronically to Dr. Jan Morpew at Jan.Morpew@fldoe.org. Evidence that the plan was implemented as described must be submitted on a CD-ROM and should be mailed to Dr. Jan Morpew, 325 W. Gaines Street, Suite 514, Tallahassee, Florida 32399. The CD-ROM facilitates the review and response process.

E-8. What is required of an LEA with a System Improvement Plan or findings from 2005 – 2006?

See E-6.

Appendix A:
LEA Compliance Monitoring Schedule

Five Year Monitoring Schedule for 2007-2011

2007-2008	2008-2009	2009-2010	2010-2011	2011-2012
Wakulla	UF Lab School	Bay	Escambia	Columbia
Dozier II	Dade	Washington	Santa Rosa	Baker
Dozier School	Pasco	Putnam	Gadsden	Lake
Hillsborough	Union	Jefferson	Nassau	Orange
Pinellas	Bradford	Hamilton	Duval	Sarasota
Gilchrist	Holmes	Manatee	Volusia	Desoto
Charlotte	Calhoun	Hardee	Seminole	St. Johns
Liberty	Citrus	Highlands	Martin	FSDB
Franklin	Hernando	Polk	St. Lucie	FSU Lab
FAU Lab	Monroe	Gulf	Palm Beach	FAMU Lab
Levy	Collier	Jackson	Hendry	Broward
Marion	Lee	Okeechobee/Dozier	Osceola	Glades
Clay	Alachua	Taylor	Okeechobee	DOC
Indian River	Lafayette	Brevard	Madison	Okaloosa
Flagler	Dixie	Leon	Suwannee	Walton
	Sumter			

Appendix B

Work Papers – Common Elements

(A) Needs Assessments and Program Planning
(B) Activities
(C) Coordination of Programs
(D) Private School Consultation
(E) Support for Reading/Strategic Imperatives
(F) School Improvement
(G) Dissemination/Marketing
(H) Reporting Outcomes
(I) Programmatic Use of Funds
(J) Budget
(K) Highly Qualified Staff
(L) Others as necessary

Appendix C Self-Evaluation Certification

2007-08 No Child Left Behind and Selected Florida Statutes Monitoring Self-Evaluation Certification

Local Education Agency: _____

Programs Self-Evaluated, Contact Information, and Outcomes

For each of the programs listed below, indicate with a check (✓) the appropriate compliance status: In Compliance, System Improvement Required, or Not Applicable. For any program area where system improvements are required, a System Improvement Plan must be attached. In the column headed, "Contact Information," please provide the name, title, mailing address (including room/office number if applicable), telephone and fax numbers (including area code), and e-mail address the person responsible for the action/system improvement plan...

Program	Compliance Status			Contact Information
	In Compliance	System Improvement Required	Not Applicable*	
Title I, Part A (Basic)				
Title I, Part A (Choice)				
Title I, Part C (Migrant)				
Title I, Part D (N&D)				
Title II, Part A (Teacher & Principal Training)				
Title II, Part D (Enhancing Education Through Technology)				
Title IV, Part A (Safe & Drug-Free)				
Title V (Innovative Programs)				
Title VI, Part B (Rural & Low-Income)				
Title X (Homeless)				

***If not applicable because the LEA does not participate in this program, please provide an explanation.**

I, _____ (Type or Print Name of Superintendent) do hereby certify that all facts, figures, and representations reported herein are true, correct, and consistent with the requirements set forth in the No Child Left Behind Act and cited sections of the Florida Statutes. Furthermore, all applicable statutes, regulations, procedures, and administrative requirements have been implemented to ensure proper accountability for the expenditures of funds. All records necessary to substantiate these requirements will be available for review by appropriate federal and state personnel.

Signature of Superintendent

Date

Submit this form with original signature and any required System Improvement Plan to:

Florida Department of Education
Office of the Chancellor
K-12 Public School Education
ATTN: Jan Morphew
325 West Gaines Street Suite 514
Tallahassee, FL 32399

Appendix D

Work Papers – Contact Information

Program	Contact Information
Title I, Part A	Lisa Bacen 850-245-0709 Lisa.Bacen@fldoe.org
Title I, Part A, Choice	Mary Jo Butler 850/245-0479 Maryjo.Butler@fldoe.org
Title I, Part C	Carolyn Mathews 850/245-0693 Carolyn.Mathews@fldoe.org
Title I, Part D	Melvin Herring 850/245-0684 Melvin.Herring@fldoe.org
Title II, Part A	Peggy Primicerio 850/245-0734 Peggy.Primicerio@fldoe.org
Title II, Part D	Charles Proctor 850/245-9868 Charles.Proctor@fldoe.org
Title IV	Brooks Rumenik 850/245-0749 Brooks.Rumenik@fldoe.org
Title V, Part A	Tameka Thomas 850/245-0845 Tameka.Thomas@fldoe.org
Title VI	Lisa Bacen 850-245-0709 Lisa.Bacen@fldoe.org
Title X	Brittney Jones 850/245-0706 Brittney.Jones@fldoe.org

Appendix E

Improvement Plan Template, Instructions, and Sample Preliminary System Improvement Plans

No Child Left Behind (NCLB) Monitoring of Local Education Agency (LEA) Programs System Improvement Plan for 2007-2008

_____ Desktop _____ Self Evaluation _____ On-site Verification

LEA: Date Prepared:		
Name of Program:		
Criterion:		
Finding:		
Objective:		
Evidence of Improvement:		
Anticipated Date of Completion:		
Person Responsible for Implementation of Plan:		
Actions to be Taken	Person(s) Responsible	Timelines

This template is available on-line at: <http://www.fldoe.org/bsa/title1/>

Instructions

General: This table is created as a Word document and cells expand to provide as much information as necessary.

LEA and Date Prepared: Enter the name of the LEA and the date the plan was prepared.

Name of Program: Enter the name of the program for which this plan was prepared (e.g., Title II, Part A – Teacher and Principal Training and Recruiting).

Criterion: Identify, using the numbers and text from the work papers, the criterion being addressed by this plan.

Finding: Describe the LEAs finding which requires the System Improvement Plan. For example, “Private schools were not provided an opportunity for equitable participation.”

Evidence of Improvement: Specify how the LEA will measure the improvement resulting from implementation of the plan, including the documentation that will be on-site and the data that will support successful implementation.

Anticipated Date of Completion: Specify the date by which the LEA is committed to successfully achieving the objective.

Person Responsible: Specify by name and title of the LEA representative who is responsible for implementation of the Plan. Provide a telephone number and e-mail address for that individual.

Actions to be Taken, Person(s) Responsible, Timelines: In the appropriate columns, delineate the actions to be taken, the person(s) responsible (by title only), and the timelines for implementation of these actions. The actions need to be specific and directly related to achievement of the objective. Timelines should be specified as a beginning date and a completion date (month and year).

Sample
No Child Left Behind (NCLB) Monitoring
System Improvement Plan for 2007-2008

<p>Name of Program: <u>Title I, Part D, Subpart 2, Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk</u></p> <p>Criterion: BID-2, The LEA attempts to find alternative placements for students that are interested in continuing their education but are unable to participate in a regular education program.</p> <p>Finding: Non-Compliance; There is no evidence that the district has established the necessary supports to assist children returning to local schools from correctional or neglected/delinquent facilities.</p> <p>Evidence of Improvement: <u>Appropriate transition plan developed and implemented.</u></p> <p>Anticipated Date of Completion: <u>August 31, 2007</u></p> <p>Person Responsible for Implementation of Plan: <u>John Q. Public, (111) 222-3333; john.public@sunshine.edu</u></p>		
Actions to be Taken	Person(s)Responsible	Timelines
A transition plan will be developed, with draft copies printed for school board members and administrators.	Director of Alternative Programs; Executive Director, School Improvement; Principals	June 2007-2008
Transition program plan will be placed on the August school board agenda for approval.	Director of Alternative Programs	July 2007-2008
Final copies of transition plan will be Printed.	Director of Alternative Programs	July 2007-2008
Transition plan copies will be distributed to school principals at a meeting in which the plan is fully explained, with technical support offered.	Executive Director, School Improvement	August 2007-2008

**Sample
No Child Left Behind (NCLB) Monitoring
System Improvement Plan for 2007-2008**

LEA: Sunshine School District

Name of Program: Title I, Part A

Criterion: CIA-8, The LEA (1) conducts, with parents, an annual evaluation of the content and effectiveness of the parent involvement policy/plan in improving the academic quality of schools funded under this part by identifying barriers to greater participation by parents in authorized activities; and (2) uses the findings to design more effective strategies and, if necessary, revise the parent involvement plan.

Finding: The LEA did not conduct an annual evaluation of the content and effectiveness of the LEAs parent involvement policy.

Objective: By the end of the 2007-08 school year, Sunshine School District will conduct, with the input of parents, an annual evaluation of the content and effectiveness of the LEAs parent involvement policy. This evaluation will measure the effectiveness of the LEAs parent involvement policy in improving the academic quality of schools and identifying barriers to participation. In addition, the LEA will analyze the results of the surveys with parents and revise the parent involvement policy as necessary.

Evidence of Improvement: Meeting agendas, surveys and their dissemination, analysis of findings, and revisions to the parent involvement policy.

Anticipated Date of Completion: May 2008

Person Responsible for Implementation of the Plan: Title I Coordinator

Actions to be Taken	Persons(s) Responsible	Timelines
1. Examine the Parent Involvement Evaluation Toolkit that is currently being piloted in three districts.	Title I Coordinator	September 2007
2. Tailor the Parent Involvement Evaluation Toolkit to be incorporated into the annual Title I Needs Assessment.	Title I Coordinator	October-November 2007
3. Administer the evaluation to parents at Title I schools.	Title I Coordinator	January 2008
4. Collect completed parent surveys and data from Title I schools.	Title I Coordinator	February 2008
5. Compile results of parent surveys.	Title I Coordinator	March 2008
6. Use findings to design more effective strategies and revise the parent involvement plan.	Title I Coordinator	May 2008

Appendix F
Sample Letter

FLORIDA DEPARTMENT OF EDUCATION



Jeanine Blomberg
Commissioner of Education

STATE BOARD OF EDUCATION

T. WILLARD FAIR, *Chairman*

Members

DONNA G. CALLAWAY

DR. AKSHAY DESAI

ROBERTO MARTÍNEZ

PHOEBE RAULERSON

KATHLEEN SHANAHAN

LINDA K. TAYLOR



June 22, 2007

Superintendent _____

LEA

Address

Address

Dear Superintendent _____:

Federal law requires the Florida Department of Education to monitor Federal programs administered by the state. The Department is committed to using a comprehensive, data-driven monitoring system that targets areas most likely to need improvement. Thank you for the assistance you provided to us in carrying out this task.

Here is a copy of our preliminary report, which has information about the monitoring activities, a summary of the monitoring outcomes related to NCLB school choice, and preliminary findings and recommendations that the team identified as a result of the review.

Any finding (partial or non-compliance) requires you to develop and submit a System Improvement Plan. Please use the enclosed form to develop your System Improvement Plan.

Plans are due 14 working days following receipt of this letter. Please send these to Peggy Reese via e-mail at Peggy.Reese@fldoe.org, or by fax at 850.245.0683.

Department staff will review the System Improvement Plans within ten business days of receipt and notify you of any necessary revisions. The approved System Improvement Plans will be included in the final report which will be finalized within 20 business days after System Improvement Plans are approved.

Superintendent _____
June 22, 2007
Page Two

The final report will also include instructions for submission of reports on the status of implementation.

We look forward to continuing to work with you and your staff on follow-up activities and the implementation of the System Improvement Plans. If you have questions or need additional information, please contact Peggy Reese.

Sincerely,

Cheri Pierson Yecke, Ph.D.

CPY/jm

cc: District Monitoring Point Person
FDOE Team Leader

Enclosures

AUDITS AND AUDIT RESOLUTIONS

Timeline: Year-round

Other Resources: OMB Circular A-133 Single Audit Compliance Supplement and <http://www.ed.gov/index.jhtml>

FDOE Contact: Alricky Smith, (850) 245-9875

Overview

Audits are similar to monitoring, but they are not the same. First, audits are conducted by the Auditor General’s Office or independent auditors engaged by the LEA, while FDOE staff conduct compliance monitoring. Second, audits are typically focused on fiscal aspects of a project and the programmatic issues closely linked to fiscal requirements; monitoring activities are focused on program requirements.

When an auditor visits a school district, s/he is there to examine whatever is already in place – policies, practices, documents, etc. Sometimes, an auditor has a different expectation than what is commonly practiced, and district staff are sometimes told that these “findings” will end up in the audit report.

Once an auditor has arrived to conduct the review, there is nothing an LEA can change that will affect that **preliminary** report. For example, if an auditor states that an LEA should have submitted an amendment for something, it is too late to submit an amendment. The auditor’s report is **preliminary**. In fact, that finding may not even make it into the report at all.

The Department receives a copy of every preliminary audit report, and reviews it to see if the Department agrees with the auditor’s findings and suggested resolutions. FDOE staff who work in the Office of Grants Management are aware of issues that arise from different interpretations auditors sometimes have. These staff work closely with program staff to discuss any potential findings. It is the FDOE that has the final decision whether or not to sustain an audit finding.