

OHIO Department of Education

March 26-30, 2007

Scope of Review: The U.S. Department of Education's (ED) Office of English Language Acquisition, State Consolidated Grant Division, and a representative from the Office of the Chief Financial Officer, conducted an on-site monitoring review of the Ohio Department of Education (ODE) March 26 –30, 2007. The purpose was to conduct a comprehensive review of the ODE's administration of the Title III, Part A program authorized by the No Child Left Behind (NCLB) Act.

During the review, the US Department of Education's team conducted several monitoring activities. The team reviewed evidence of the implementation of the State's Title III accountability system, State level monitoring, technical assistance, and professional development activities as well as fiscal and administrative oversight. During the on-site review, the team also conducted monitoring visits to three local education agencies (LEA's): Columbus School District, Cincinnati School District, and South-Western City School District to assess the depth and breadth of the State's implementation of the Title III requirements.

Ohio Department of Education Participants:

Mitchell Chester, Senior Associate Superintendent
Barry Bentley, Director, Office of Quality Assurance
Stephen Barr, Associate Director, Center of School Improvement
Stephanie Gerber, Director, Office of Federal Programs
Rosie Doughty, Assistant Director, Office of Federal Programs
Judy Feil, Director, Office of Assessment
Don Peasley, Associate Director, Office of Assessment
Nancy Haefeli, Education Management Information System (EMIS) Project Manager
Chad Richardson, Data Manager
John Childs, Chief Financial Officer
Brian Brown, Director of Financial Services
Sandy Vasu-Sarver, Executive Director, Family and Communities
Abdinur Mohamud, Title III Consultant
Dan Fleck, Title III Consultant

LEA Representatives:

Columbus School District Participants:

Marvenia Bosley, Deputy Superintendent
Mary Ey, Director, Special Education
Mary Donovan, District English as a Second Language (ESL) Coordinator
Ken Woodward, District ESL Supervisor; Principal, Mifflin Welcome Center
Jill Dannemiller, Title I Supervisor
Michael Kinneer and Terry Addison, Chief Financial Officers
Maritza James, Title III Budget Officer

School visits: Eakin Elementary School, Mifflin Welcome Center

Cincinnati School District Participants:

Laura Mitchell, Deputy Superintendent

Ed Green, Mayerson Academy

Rebecca Ruckel, Director of Grants Administration for Federal Programs

Jim Malott, Compliance Officer, Grants Administration

Kathie Stanghetti, Accountant

Elizabeth Holtzapple, Director of Research, Evaluation & Testing

Marie Kobayashi, Psychologist

Sister Margarita Brewer, Parent Outreach Coordinator

School visits: Academy of World Languages, Withrow International High School

South-Western City School District Participants:

Lois Rapp, Associate Superintendent

Rene Phillips, Title III Director

Regina Perkins, Administrative Assistant

Karolyn King, Coordinator, State and Federal Programs

Cathy Bulgrin, Treasurer

Anita McCreary, Title III Budget Officer

David Hitchcock, Equipment/IT Asset Manager

School visits: Galloway Ridge Intermediate, Norton Middle School

U.S. Department of Education Participants:

Margarita Pinkos, Associate Assistant Deputy Secretary

David Chege, Office of the Chief Financial Officer, Internal Control Evaluation Service

Seree Weroha, Budget Analyst, OELA

Liz Bailey, Education Program Specialist, OELA

Millie Bentley-Memon, Senior Education Program Specialist, OELA

Previous Audit Findings: None

Previous Monitoring Findings: None. This was the first Title III monitoring visit.

Summary of Title III, Part A Monitoring Indicators

State Submissions			
Element Number	Description	Status	Page
Element 1.1	State Submissions: Follow-up on areas identified through desk audit and document reviews	Reviewed	7
Fiduciary			
Element 2.1	Reservation and Use of Funds: The SEA has a system in place that enables it to account for: (1) Funds reserved for State administration (2) Funds reserved to provide technical assistance and other State-level activities (3) Funds reserved for immigrant activities, and (4) Funds that become available for reallocation	Fiscal Report Forthcoming	7
Element 2.2	Allocations, Reallocations, and Carryover: The SEA complies with— <ul style="list-style-type: none"> • The procedures for Title III allocations outlined in Section 3114 • The procedures for allocating funds for immigrant children and youth programs as outlined in Section 3114(d) • The reallocation provisions in Section 3114(c) 	Fiscal Report Forthcoming	7
Element 2.3	Supplement not Supplant: The SEA ensures that Title III funds are used only to supplement or increase Federal, State, and local funds used for the education of participating children and not to supplant those funds	Fiscal Report Forthcoming	7
Element 2.4	Equipment and Real Property: The SEA ensures that equipment is procured at a cost that is recognized as reasonable and that the equipment is necessary for the performance of the Federal award. Title III funds may not be used to acquire real property.	Fiscal Report Forthcoming	7
Element 2.5	Other Financial Management Issues	Fiscal Report Forthcoming	7

ELP Standards, Assessments and Accountability			
Element Number	Description	Status	Page
Element 3.1	English Language Proficiency (ELP) Standards: State English language proficiency standards: the State provided evidence of a process that complies with Section 3113.	Reviewed	7
Element 3.2	ELP Assessments: the State provided evidence of a process that complies with Title III section 3113 and evidence that an ELP assessment has been administered to all K-12 LEP students in the State.	Finding: Further Action Required	7
Element 3.3	New English Language Proficiency Assessment: The State provided evidence of a process that complies with Title III section 3113. Transition to new ELP assessment or revision of the current State ELP assessment aligned to the state developed ELP standards	Finding: Further Action Required	8
Element 3.4	Annual Measurable Achievement Objectives (AMAOs): AMAOs have been developed and AMAO determinations have been made for Title III-served LEAs.	Finding cited in Special Conditions	8
Element 3.5	Data Collection: The State has established and implemented clear criteria for the administration, scoring, analysis, and reporting components of its ELP assessments, and has a system for monitoring and improving the ongoing quality of its assessment systems. Data system is in place to meet all Title III data requirements, including capacity to follow Title III-served students for two years after exiting; State approach to follow ELP progress and attainment over time.	Reviewed	8

State Level Activities; LEA Authorized and Required Activities; Immigrant Children and Youth			
Element Number	Description	Status	Page
Element 4.1	<p>State Level Activities: Using administrative funds, the State carries out one or more activities that may include:</p> <ul style="list-style-type: none"> • Professional development • Planning, evaluation, administration and interagency coordination • Promoting parental and community participation • Providing recognition to subgrantees that have exceeded AMAO requirements 	Reviewed	8
Element 4.2	<p>Required Subgrantee Activities: The subgrantee must provide high quality language instructional education programs and sustained professional development activities to all classroom teachers of LEP students (including teachers in classroom settings that are not defined as language instructional education programs). Training activities must also include principals, administrators, and other school or community based organization personnel.</p>	Reviewed	8
Element 4.3	<p>Authorized Subgrantee Activities: The LEA may use the funds by undertaking one or more authorized activities.</p>	Reviewed	8
Element 4.4	<p>Activities by Agencies Experiencing Substantial Increases in Immigrant Children and Youth: The subgrantee receiving funds under Section 3114(d)(1) shall use the funds to pay for activities that provide enhanced instructional opportunities for immigrant children and youth.</p>	Reviewed	9

State Review of Local Plans			
Element Number	Description	Status	Page
Element 5.1	Application: The SEA ensures that its LEAs comply with the provision for submitting an application to the SEA (Section 3116(a)).	Commendation	9
Element 5.2	Private School Participation: LEAs are complying with NCLB requirements regarding participation of LEP students and teachers in private schools under Title III.	Reviewed	9
Element 5.3	Teacher English Fluency: Certification of teacher fluency requirement in English and any other language used for instruction (Section 3116)	Reviewed	9
State Monitoring of Subgrantees			
Element 6.1	Monitoring: The SEA conducts monitoring of its subgrantees sufficient to ensure compliance with Title III program requirements	Commendation	9
Parental Notification			
Element 7.1	Parental Notification: Provisions for identification and placement and for not meeting the AMAOs; notification in an understandable format as required under Section 3302.	Reviewed	10

State Submissions

Element 1.1 - State Submissions

Reviewed: The Ohio Department of Education (ODE) has submitted all reports required under Title III, Part A, and the Consolidated State Application to the U.S. Department of Education.

Citation: Section 3123, 34 CFR 80.40

Fiduciary

Fiscal Report Forthcoming from ED's Office of the Chief Financial Officer

Element 2.1 – Reservation of Funds

Citation: Sections 3111, 3114(d), 3115, and 3116

Element 2.2 – Allocations, Reallocations, and Carryover

Citation: OMB A-87; EDGAR; 34 CFR 76.722; 34 CFR 80.4.

Element 2.3 – Supplement not Supplant

Citation: Section 3115(g); OMB Circular A-87 (Attachment A)

Element 2.4 – Equipment and Real Property

Citation: OMB A-87; EDGAR 76.533, 80.32

Element 2.5 – Other Financial Management Issues

ELP Standards, Assessments, and Accountability

Element 3.1 - ELP Standards

Reviewed: The ODE demonstrated that it has a process in place that addresses the requirements in Section 3113.

Citation: Sections 3113(b)(2) and (b)(3)(D).

Element 3.2 - ELP Assessments

Finding: The ODE does not annually assess all students who are categorized as LEP for English language proficiency.

Further Action Required: The ODE must ensure that all LEP students are annually assessed for English language proficiency as long as they are in the LEP category.

Citation: Section 3113(b)(2)

Element 3.3 – New English Language Proficiency Assessment

Finding: The ODE is using 2004-2005 school year English language proficiency assessment data to establish its baseline year for reporting student performance toward meeting Title III annual measurable achievement objectives (AMAOs).

Further Action Required: ODE must use 2002-2003 assessment data as its baseline year for reporting student performance toward meeting Title III AMAOs.

Citation: Section 3113

Element 3.4 – Annual Measurable Achievement Objectives (AMAOs)

Ohio received Special Conditions as part of the Title III State formula grant award on July 1, 2007. Please refer to the Special Conditions document (copy attached) for a complete explanation related to findings specific to Element 3.4.

Element 3.5 – Data Collection

Reviewed: Ohio's Education Management Information System (EMIS) records and tracks data on LEP students statewide. The three LEAs visited demonstrated that their data collection systems are coordinated with the State's system.

Citation: Section 3113, 3121 - 3123

State Level Activities; LEA Authorized and Required Activities; Immigrant Children and Youth

Element 4.1 – State Level Activities

Reviewed

Citation: Sections 3111 and 3122

Element 4.2 – Required Subgrantee Activities

Reviewed

Citation: Section 3115(c)

Element 4.3 – Authorized Subgrantee Activities

Reviewed

Citation: Section 3115(d)

Element 4.4 – Activities by Agencies Experiencing Substantial Increases in Immigrant Children and Youth

Reviewed

Citation: Section 3114(d)

State Review of Local Plans

Element 5.1 – State Review of Local Plans

Commendation: The State’s Comprehensive Continuous Improvement Plan (CCIP) system is used by LEAs to submit local applications that are coordinated across Federal entitlement programs. This system provides a systematic local application process that results in a timely review and approval process by the SEA.

Citation: Section 3116(a)

Element 5.2 – Private School Participation

Reviewed:

Citation: Section 9501

Element 5.3 – Teacher English Fluency

Reviewed: Teacher English fluency is established through Ohio’s teacher preparation and licensure process. A teaching license appropriate to the teaching assignment is required in Ohio.

Citation: Section 3116(c)

State Monitoring of Subgrantees

Element 6.1 – State Monitoring of Subgrantees

Commendation: The ODE has a systematic and consistent process for monitoring LEAs that includes on-site visits, desk monitoring, telephone surveys, and the use of the Program Audit and Compliance Tracking System (PACTS). LEAs visited commended the State for the quality and valuable feedback they received from the State on-site reviews.

Citation: Section 3113, 3122; and 34 CFR 80.40

Element 7.1 – Parental Notification

See Element 3.4

Citation: Section 3302