



2013-2014 No Child Left Behind (NCLB) Monitoring of Selected Programs

Frequently Asked Questions

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The Florida Department of Education (FDOE) monitors federally funded programs operated by Local Educational Agencies (LEAs) 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 increase student achievement. This guidance document explains the process that the FDOE will use to monitor LEAs during the 2013-2014 school year

This document replaces the 2012-2013 NCLB Monitoring Frequently Asked Questions (FAQs).

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

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A. Background

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

The *Education Department General Administrative Regulations* (EDGAR) at 34 CFR 80.40(a) requires the FDOE to monitor subgrant 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 does monitoring accomplish?

Monitoring is a means of ensuring selected programs under NCLB meet federal guidelines and are implemented with fidelity, as outlined in the project application, in order to increase student achievement. Monitor(s) look specifically at the programmatic regulations, as well as the expenditure of funds.

A-3. What is the difference between an audit and monitoring?

Compliance monitoring and audits are closely related but conducted by different entities. Monitoring is conducted by FDOE staff, looking specifically at program implementation and the use of federal funds. On the other hand, the Auditor General's Office or other independent auditing firms conduct audits, which look at the fiscal aspects of a project and the programmatic issues closely linked to fiscal requirements.

There is some overlap between the two activities; however, the FDOE makes every effort to reduce as much redundancy as possible. It should also be noted that the FDOE is responsible for conducting follow up on any findings made by the Auditor General or independent auditors, as well as any findings made by the U.S. Department of Education, if the findings are the result of visits to the LEA. Results of such audits and monitoring visits are taken into consideration as part of the monitoring activities of the FDOE.

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

The FDOE visits LEAs, schools and classrooms and interviews instructional staff for a variety of purposes. A technical assistance visit is designed to provide support to an LEA in meeting the federal program requirements. 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.

A-5. Which NCLB programs will be monitored?

This guidance refers only to the monitoring process for NCLB formula-funded (entitlement) programs, as well as selected discretionary programs. The FDOE will use the process described in this document to monitor the following programs:

- Title I, Part A, Improving the Academic Achievement of the Disadvantaged
- Title I, Part C, Education of Migratory Children
- Title I, Part D, Subpart I, State Agency Programs for Neglected and Delinquent
- Title I, Part D, Subpart II, Local Agency Programs for Neglected and Delinquent
- Title II, Part A, Teacher and Principal Training and Recruiting
- Title III, Language Instruction for Limited English Proficient and Immigrant Students
- Title VI, Part B, Subpart II, Rural and Low-Income Schools Program
- Title X, Part C, Education for Homeless Children and Youth

A-6. Are LEAs that do not receive Title X, Part C, Education for Homeless Children and Youth subgrants required to complete the Title X, Part C monitoring work papers?

Yes. All LEAs must complete and submit the Title X, Part C monitoring work papers, regardless of whether they receive the Title X, Part C subgrant. All LEAs must meet basic requirements of Title X, Part C that pertain to homeless children, which will be monitored. There are additional compliance items for those LEAs that receive the subgrant.

A-7. What forms of monitoring does the FDOE use?

The FDOE uses many activities to monitor compliance, including the review and approval of LEA Plans and annual project applications. Each year, all LEAs are expected to conduct self-monitoring, using a set of criterion items called work papers, to assess their own level of compliance. In addition to these routine monitoring activities, focused monitoring is conducted annually for a subset of LEAs, based on their Risk Score and at the discretion of the program office. The FDOE uses three types of focused monitoring: desktop (a remote data review with limited or no time spent onsite); onsite (a physical visit to the LEA with face-to-face interviews) and enhanced self-monitoring (additional self-monitoring requirements that provide updates on any outstanding issues). In addition, a program may determine to target monitor LEAs, concentrating on one or more specific Common Elements (see list under Appendix B), or follow-up monitor LEAs that have had recurring or substantial compliance issues.

A-8. How are LEAs selected for desktop monitoring, onsite visits or enhanced self-monitoring?

The FDOE uses a risk-based system of monitoring. Determined by a number of weighted risk factors, each LEA is given a Risk Score for each program listed in A-5. Further details on the program specific Risk Score calculations are in Appendix B. The LEAs with the lowest scores in each program are most likely to be selected for desktop or onsite monitoring. A program may determine that the low score alone does not warrant a focused review; for example, an LEA may have been recently reviewed through monitoring or other means and shown progress in problem areas. In these cases, an enhanced self-monitoring review may be sufficient to determine the current compliance status.

At a program's discretion, there may be unresolved issues that warrant a desktop or onsite review even though the Risk Score is not in the lowest group. If the FDOE determines an LEA has consistently failed to reach compliance, the LEA may be monitored for that year, regardless of total Risk Score.

A-9. How often is each LEA or funded entity monitored?

A program-specific risk assessment is conducted each year for all LEAs in Florida. Based on the Risk Score and other program specific considerations, an LEA may be selected for desktop or onsite monitoring. In addition, a subset of LEAs will be selected to complete additional enhanced self-monitoring activities. Annually, all LEAs conduct self-monitoring requirements, at a minimum.

Note: The FDOE reserves the right to monitor any LEA as frequently as necessary to ensure compliance with federal and state law and to positively impact student achievement.

A-10. Why is compliance monitoring necessary, since each LEA certifies its own compliance on an annual basis through self-monitoring?

While self-monitoring is a valuable part of the monitoring process, the U.S. Department of Education has determined having LEAs report their own designations regarding compliance is not sufficient. In addition, self-monitoring prepares LEAs for future onsite visits and possible follow-up or targeted monitoring.

A-11. How do LEAs know when they are going to be monitored and by what method?

The FDOE will notify the LEAs selected for monitoring and by which method (onsite, desktop, enhanced or self) within a reasonable amount of time so that the selected LEAs can submit all necessary documentation.

A-12. What is required in enhanced self-monitoring?

An LEA designated for enhanced self-monitoring will be required to complete all self-monitoring requirements. In addition, the LEA may be required to provide a status report on any unresolved issues or system improvement plans. State program offices will determine the additional submission requirements and inform the LEA liaison. The FDOE reserves the right to schedule a desktop or onsite review if submissions are not sufficient.

B. Work Papers

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

The work papers are a set of compliance items for each of the programs listed in A-5. They serve as an opportunity for each LEA to review its own compliance. In years when the LEA is not expected to participate in formal FDOE monitoring, the work papers enable LEAs to review the alignment of their practices and policies with federal and state requirements and student achievement. The work papers are organized into common elements by subject; a list of “Work Paper Common Elements” can be found in Appendix B.

B-2. Which LEAs should complete the work papers?

All LEAs are expected to complete the work papers in the monitoring system in order to assess their own compliance. For each compliance item, they should indicate whether all requirements are met, further action is required or the item is not applicable. Only those scheduled for desktop or onsite monitoring should submit a complete set of work papers by answering the questions for all applicable items and uploading the supporting documentation to the FDOE system. LEA programs conducting only self-monitoring or enhanced self-monitoring may be required to upload some documentation for a few of the programs monitored. A list of all required documents for self-monitoring LEAs will be on the monitoring website (http://www.fldoe.org/NCLB/nclb_monitoring.asp). Programs designated as enhanced self-monitoring may be required to upload additional documentation at the FDOE’s discretion, which will be communicated to the LEA liaison. Regardless of monitoring status, it is important that all LEAs maintain complete documentation, as it may be requested by the U.S. Department of Education or the FDOE.

B-3. Does an LEA have to complete work papers for all federal programs?

Yes. An LEA needs to complete work papers for the programs under which it receives funding. In addition, all LEAs must complete the work papers for Title X, Part C, Education for Homeless Children and Youth. There are basic requirements that apply to all LEAs even if an LEA does not receive funding under Title X, Part C; therefore, compliance will be monitored. There are additional compliance items for those LEAs that receive the Title X, Part C subgrant.

B-4. Is the LEA expected to determine whether it complies with each item?

Yes. For each compliance item, the LEA is expected to determine whether it has met all requirements or if further action is required. If “Further Action Required” is selected, a System Improvement Plan must be developed and submitted. By submitting the Self-Evaluation Certification, the LEA indicates that it considers itself in compliance or in need of further action and will correct any problem areas during the upcoming year.

Note: If findings are not resolved (moved to Requirements Met status) in a given monitoring cycle or by the “Anticipated Date of Completion” in the System Improvement Plan, they should carry over to the new monitoring cycle. Submitting approvable evidence of System Improvement Plan implementation brings items requiring further action into full compliance (see D-8).

B-5. Are the work papers available online?

Yes. The Microsoft Word versions of the work papers are available at http://www.fldoe.org/NCLB/nclb_monitoring.asp and within the monitoring system (<https://app1.fldoe.org/bsa/grantsmonitoring>). While these can be used as working documents, the online work papers, along with the upload of documents for each program, must be completed in the online monitoring system; none of these components are acceptable via email or through mail services (USPS, FedEx, etc.).

B-6. How is the online system organized?

The online system has several different sections within each NCLB Title Program. They are listed below.

Common Elements – Staff from the FDOE identified the Common Elements associated with specific requirements related to each program. A complete list of the Common Elements can be found in Appendix C. These are used to organize Compliance Items and are seen as the first letter in a compliance item number.

Compliance Statements – The work papers include compliance statements, which indicate specific requirements of NCLB and Florida Statutes relating to the program being monitored. The compliance statements also provide reference to the relevant legislative citation. They are organized by Common Element (e.g., all AIA items are Needs Assessment and Program Planning for Title I, Part A).

Review Questions – The Review Questions help an LEA determine its compliance status. To successfully prepare for the monitoring activities, all LEAs should answer each question thoroughly and succinctly, regardless of whether they are required to submit the answers in the online system.

Documents to Support Compliance – Each program in an LEA is responsible for uploading documentation, as specified by the work papers and state office, to verify its compliance status and the answers to the Review Questions. Self-monitoring and enhanced self-monitoring programs will provide uploads for selected items; desktop and onsite programs will upload for all applicable items.

Compliance Designations (LEA) – For each compliance item, the program should select one of the designations regarding compliance (see B-8): Requirements Met, Further Action Required or Not Applicable.

B-7. Do all Review Questions have to be answered?

The Review Questions should be answered as a means of determining compliance. Each program in an LEA should answer the questions for all applicable items; however, only desktop and onsite programs will be required to submit the answers in the online system. Self-monitoring and enhanced self-monitoring programs should maintain their answers at the district, unless otherwise directed by the state office.

B-8. What do the various designations regarding compliance mean?

The various designations and their definitions are:

Requirements Met – The LEA has sufficient evidence either in the online system (desktop/onsite) or maintained onsite (enhanced self-monitoring/self-monitoring) to document full compliance with the requirement.

Further Action Required – All or part of the requirement is not documented as in compliance, and a System Improvement Plan should be developed for every compliance item where further action is required. Plans should address each specific finding.

Not Applicable – The requirement is not applicable to the LEA being monitored. If “Not Applicable” is checked, the LEA should explain in the comment box why the requirement is not applicable. For example, an LEA with only Title I, Part A schoolwide programs would indicate that the items regarding targeted assistance programs are not applicable.

B-9. What school year is the focus of the 2013-2014 work papers?

The focus of the monitoring review for the 2013-2014 monitoring cycle is program implementation for the most current year available. The FDOE monitor(s) will review data from the 2013-2014 school year or, if data are not yet available, the 2012-2013 school year. The FDOE reserves the right to request documentation from prior years.

B-10. Who can answer specific questions about the content of the work papers?

A list of FDOE program contacts can be found in Appendix D. If there are specific questions about the content, e.g., what documentation is appropriate for a specific criterion, please contact the person or office listed.

B-11. Do all LEAs have to submit a complete set of work papers?

All LEAs need to log in to the online system and indicate their level of compliance for each item. Only programs designated for onsite or desktop monitoring need to submit a complete set of work papers, including answers to all applicable questions and the supporting documents. Certain self-monitoring programs will be required to upload select documentation. A list of these items can be found on the NCLB Monitoring website (http://www.fldoe.org/NCLB/nclb_monitoring.asp). The FDOE will clearly communicate any additional requirements for enhanced self-monitoring directly to the LEA liaison.

Note: Submissions via the online system are the only acceptable format. Hard copy submissions of the work papers will not be accepted, unless there are extenuating circumstances.

B-12. When are the work papers due?

For the 2013-2014 monitoring cycle, LEAs should submit the required Self-Evaluation Certifications, work papers and supporting documentation 30 business days after the release of the online monitoring system.

B-13. How does an LEA submit its work papers?

An LEA should complete work papers in the online system, found at http://www.fldoe.org/NCLB/nclb_monitoring.asp. Once the work papers have been submitted for all programs, LEAs will be able to generate a Self-Evaluation Certification in the online system. The form can be printed out and signed by the superintendent (or designee) or signed via electronic signature. This signed document should then be sent electronically to ofp@fldoe.org. It should be noted that by signing this form, the superintendent assures that the work papers are complete and accurate to the best of his/her knowledge (see Appendix E for a sample form).

B-14. How does the FDOE use the work papers?

The FDOE uses the work papers for a variety of purposes. They are an assurance that LEAs, as subgrantees, comply with federal and state laws. The LEAs identify areas in which they are not compliant; the FDOE can then focus technical assistance on those areas most frequently found out of compliance. Work papers also allow the FDOE to identify LEAs' best practices. As part of the onsite and desktop monitoring processes, the monitoring team reviews the work papers prior to the actual week of monitoring to help them prepare and minimize LEAs' workload at the time of the reviews.

B-15. Is there anything else that should be submitted to support the work papers?

Yes. A program being monitored through desktop or onsite activities should upload documentation following the submission of the work papers. Documentation is also due 30 business days after the release of the online monitoring system. Self-monitoring programs may be required to upload some documentation to support compliance in certain areas. A list of these items can be found on the NCLB Monitoring website (http://www.fldoe.org/NCLB/nclb_monitoring.asp). In addition to regular self-monitoring requirements, a program designated as enhanced may be required to upload documentation specific to an LEA and at the discretion of the state office.

B-16. What documentation is an LEA required to upload?

Programs monitored through desktop or onsite reviews will be required to upload documentation for all applicable compliance items in the work papers. The Documents to Support Compliance section of the work papers lists suggested and required documentation for each item. For further assistance in determining what meets the requirements for full compliance, please contact the appropriate program office. In addition, the Bureau of Federal Education Programs has developed toolkits to assist in determining what documentation meets compliance requirements; visit the NCLB Monitoring website for a link to the available toolkits (http://www.fldoe.org/NCLB/nclb_monitoring.asp).

B-17. How does the FDOE use the documentation?

The documentation is used to determine if program requirements are met for each compliance item or area monitored. Documentation is reviewed by FDOE program staff prior to and during the desktop or onsite reviews. Additional documentation may be requested prior to and during monitoring activities or, in special cases, after a request for reconsideration.

C. Monitoring Process

C-1. What does a desktop monitoring review involve?

FDOE monitor(s) will review the work papers and documentation provided prior to the review, requesting additional documentation as needed. Members of the FDOE team will work with the LEA liaison to establish a schedule that covers all necessary activities before the monitoring review takes place. During the monitoring process, the FDOE may request conference calls with appropriate LEA personnel. Every effort will be made to coordinate phone interviews with the schedules of LEA personnel. The LEA will have an additional five working days following the monitoring week to upload any final requests for documentation. Monitor(s) will conduct program specific exit activities at the closure of the review. In some cases, the FDOE may wish to follow up with an onsite visit to interview additional LEA personnel or review additional documents.

C-2. How long does the desktop monitoring process take?

Desktop monitoring is designed to take place within one continuous workweek or less and is planned in cooperation with LEA personnel.

C-3. How should an LEA prepare for desktop monitoring?

The FDOE requests that each LEA select a single point-of-contact to coordinate the monitoring components. On or before the release of the online monitoring system, the superintendent (or designee) should designate an LEA liaison; the monitoring system password will be released to the LEA liaison. The programs designated for desktop monitoring should complete the work papers online by answering the Review Questions and uploading all Documents to Support Compliance into the online system (<https://app1.fldoe.org/bsa/grantsmonitoring/>). Desktop programs should review all questions in the work papers prior to the visit and be prepared to answer additional questions during the interviews. Personnel who can address these questions should be available during the monitoring process. Each LEA with programs to be monitored will receive specific correspondence from the FDOE regarding monitoring requirements.

C-4. Are non-FDOE personnel involved in desktop monitoring?

No.

C-5. Who is involved in the desktop monitoring review?

The FDOE will coordinate each phone call with the LEA liaison. Depending on the program(s) reviewed, the monitor(s) will interview LEA personnel including, but not limited to, the following individuals.

LEA Staff

- Superintendent (or Designee)
- NCLB/Federal Program Coordinators
- Finance Officer
- Assessment Coordinator
- Management Information Systems (MIS) Coordinator

- Curriculum Coordinator
- Exceptional Student Education Coordinator
- Certification Coordinator
- Staff Development Coordinator
- Student Services Director

C-6. What does an onsite monitoring visit involve?

FDOE monitor(s) will review all components of the completed online work papers provided prior to the visit, requesting additional documentation as needed. The visit begins with an optional entrance interview, via conference call with members of the FDOE team and LEA personnel, during which the scope of the visit will be explained. While onsite, the monitor(s) may interview LEA personnel, parents, public and private school personnel, vendors, and any additional persons as needed to make an accurate assessment of program implementation.

In addition, the monitor(s) will visit schools and other facilities, observing classrooms and project activities. The FDOE will work with the LEA liaison to establish a schedule that covers all necessary activities before the monitoring review takes place. Every effort will be made to coordinate interviews with the schedule of all interviewees. Monitor(s) reserve the right to request additional documentation that may or may not be listed in the work papers in order to fully prove compliance. The LEA will have an additional five working days following the monitoring week to upload any final requests for documentation. Monitor(s) will conduct program specific exit activities at the closure of the review.

C-7. How long is the FDOE team in the LEA during an onsite visit?

Onsite monitoring visits are designed to take place within one continuous workweek whenever possible and planned in cooperation with LEA personnel.

C-8. How should an LEA prepare for an onsite visit?

The FDOE requests that each LEA select a single point-of-contact to coordinate the visit. On or before the release of the online monitoring system, the superintendent (or designee) should designate an LEA liaison; the monitoring system password will be released to the LEA liaison. The onsite program(s) should complete the online work papers 30 days after the release of the online monitoring system by answering the Review Questions and uploading all applicable Documents to Support Compliance into the online system (<https://app1.fldoe.org/bsa/grantsmonitoring>). The program(s) should carefully review the questions in the work papers and make personnel available who can address these questions. Each LEA with programs to be monitored will receive specific correspondence from FDOE regarding the visit and requirements.

C-9. Are non-FDOE personnel involved in an onsite monitoring visit?

Sometimes. The FDOE may train and make limited use of staff from other LEAs or programs as peer monitors.

C-10. Who participates in the onsite visit?

The FDOE will coordinate each interview with the LEA liaison. Visits to specific schools and facilities will be determined during the development of the schedule. Depending on the program(s) reviewed, the monitor(s) will interview LEA personnel including, but not limited to, the following individuals.

LEA Staff

- Superintendent (or Designee)
- NCLB/Federal Program Coordinators
- Finance Officer
- Assessment Coordinator
- Management Information Systems (MIS) Coordinator
- Curriculum Coordinator
- Exceptional Student Education Coordinator
- Certification Coordinator
- Staff Development Coordinator
- Student Services Director

School Staff

- Principal (or Designee)
- Instructional Staff
- Paraprofessionals
- Guidance Personnel
- School Resource Officer

Others

- Representatives from private schools receiving services through NCLB Programs
- Parents

D. Reporting and Follow-up

D-1. What can an LEA expect after desktop or onsite monitoring?

After the desktop or onsite monitoring review, the FDOE will assemble a preliminary monitoring report. The preliminary report, which undergoes several levels of leadership review, will be sent via email to the superintendent and LEA liaison. The preliminary report will identify areas where the LEA met requirements or where further action is required, 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.

D-2. May an LEA appeal findings of further action required?

Yes. The LEA may request reconsideration (an appeal) of the findings within 10 working days of receiving the preliminary report if there is a factual error. The appeal should contain an explanation for the request based on evidence submitted during the scheduled desktop or onsite

monitoring review. The explanation and uploaded documents will be reviewed again to make a final determination of findings.

D-3. How does an LEA submit a request for reconsideration?

If an LEA has determined there is a factual error in the report, the LEA should put its request in writing and send it to the FDOE (ofp@fldoe.org or 325 West Gaines Street, Suite 644, Tallahassee, Florida 32399-0400). The request should include a clear and concise explanation of the error with specific references to documentation uploaded into the system.

Note: Additional documentation will not be considered in the reconsideration request. However, the FDOE reserves the right to request additional documentation should it be needed for clarification or to determine the scope of an issue.

D-4. What should an LEA do after it receives a preliminary report identifying one or more areas of noncompliance and, therefore, requiring further action?

If the LEA does not request a reconsideration of findings, it should develop and submit a System Improvement Plan for each compliance item where further action is required

D-5. What should be included in the System Improvement Plans?

Each System Improvement Plan acknowledges the finding is accurate and outlines steps to correct the finding. System Improvement Plans should provide the specific steps the LEA will take to come into compliance, including anticipated timelines and what the LEA hopes to achieve by implementing the plan. These serve as a comprehensive “plan of action,” outlining the key components of necessary system improvements that will ensure future compliance with federal requirements. A System Improvement Plan template, instructions and completed samples are provided in Appendix F. LEAs may request a Microsoft Word version of the template by emailing ofp@fldoe.org.

D-6. When are System Improvement Plans due?

For self-monitoring or enhanced self-monitoring programs, System Improvement Plan(s) are due with the Self-Evaluation Certification 30 business days after the release of the online monitoring system. System Improvement Plans required for LEAs being monitored through desktop or onsite activities are due within 10 working days of the receipt of the preliminary report. If the LEA requests reconsideration and the appeal is denied, the System Improvement Plans are due within 10 working days of receipt of the response to the appeal.

D-7. How should System Improvement Plans be submitted?

System Improvement Plans should be submitted through the online system found on the NCLB monitoring website (http://www.fldoe.org/NCLB/nclb_monitoring.asp). For further information about the steps to submitting a System Improvement Plan, please refer to the Technical Assistance Manual (<http://www.fldoe.org/NCLB/ppts/pdfs/leamontadoc.pdf>).

D-8. Does the FDOE check to see if the findings have been addressed?

Yes. Based on the gravity of the findings, the FDOE may establish additional reporting schedules that may, at the FDOE’s discretion, involve follow-up visits to or enhanced self-monitoring requirements for the LEA to verify the findings have been corrected.

D-9. What are the consequences if an LEA does not address monitoring findings?

The FDOE has a responsibility to the U.S. Department of Education to ensure that its subgrantees are in full compliance with federal law, and to the Florida State Legislature to ensure that subgrantees are in full compliance with state law. The FDOE reserves the right to withhold funding to, and to implement more restrictive conditions for, subgrant recipients deemed as not implementing federal and state programs with fidelity, as determined through the monitoring process.

D-10. How can an LEA document that it has corrected a finding identified through monitoring?

An LEA documents that findings have been corrected by providing evidence that the System Improvement Plan has been implemented. During the development of a System Improvement Plan, an LEA will consider and specify the documentation that will prove implementation of the plan. Evidence of plan implementation should be uploaded into the online monitoring system found at http://www.fldoe.org/NCLB/nclb_monitoring.asp. Along with the documentation, LEAs should give a brief but thorough description of the evidence provided. This description will allow FDOE staff to better align evidence of implementation with the approved System Improvement Plan.

D-11. When is evidence that a 2012-2013 System Improvement Plan has been implemented due?

System Improvement Plans from the previous monitoring year should be implemented by the “Anticipated Date of Completion,” specified in the plan and approved by FDOE program staff. If not completed earlier, all System Improvement Plans should be implemented and evidence provided no later than the due date established for the 2013-2014 work papers and documentation. If a finding is not fully resolved by when the release of the 2013-2014 online monitoring system occurs, the item will remain in “Further Action Required” status until it is completed, which should be indicated in the new cycle’s work papers, and a new System Improvement Plan should be submitted. If the approved completion date falls beyond the 2013-2014 release date, LEAs should submit evidence in line with the approved deadline. The LEA should keep FDOE program staff apprised of its progress of implementation. See D-9 for the consequences of not addressing monitoring findings.

D-12. Is there a final report?

Yes. A final report will be issued after the FDOE has received and approved all System Improvement Plans. If an LEA with findings of noncompliance fails to submit acceptable System Improvement Plan(s) within 20 working days following receipt of the preliminary report, the final report will be issued indicating that the LEA has failed to address the monitoring findings. See D-9 for consequences of not addressing monitoring findings. Final reports will also include any changes made as a result of FDOE’s response(s) to the reconsideration request. All final reports are considered public records and are available for public review, consistent with Florida’s Government in the Sunshine laws and rules.

Appendix A

Monitoring Definitions

Monitoring: Monitoring is the state-level review of LEA implementation of selected programs under NCLB to determine compliance with applicable federal and state regulations. The focus is on programmatic areas and some fiscal components that have an impact on student achievement.

Audit: An audit examines financial records and provides technical assistance and guidance to LEAs concerning the recipients of monies from the FDOE. Auditors review the use of funds, expenditures and program requirements to determine compliance.

Risk Score: The Risk Score shows an LEA's level of risk as determined by the factors listed in Appendix B. It is determined by applying a weighted score to each LEA per factor, and then taking the sum divided by the total number of points possible. The Risk Score calculation is a tool for determining which LEA programs will be reviewed via onsite, desktop, enhanced self- or self-monitoring.

Onsite Monitoring: Onsite monitoring is a physical visit to the LEA with the specific intent of interviewing LEA staff (main office, schools or other facilities) face to face to determine compliance. LEAs designated for onsite monitoring are provided an official report of the outcome of the review.

Desktop Monitoring: Desktop monitoring is a remote review of the LEA that is conducted by telephone between FDOE and LEA staff. Staff in schools and other facilities are typically not interviewed; however, the FDOE reserves the right to physically visit an LEA selected for desktop monitoring. LEAs designated for desktop monitoring are provided an official report of the outcome of the review.

Enhanced Self-Monitoring: Enhanced self-monitoring is a designation given to LEAs that received a low Risk Score, but do not require onsite or desktop monitoring. LEAs selected for enhanced self-monitoring will be expected to provide a progress report or additional documentation beyond what is expected of regular self-monitoring. Typically, there will not be interviews with LEA staff or a monitoring report.

Self-Monitoring: Self-monitoring is a designation given to LEAs that are not selected for onsite, desktop or enhanced self-monitoring. LEAs selected for this designation will be expected to complete self-monitoring requirements detailed in A-4 of the *Monitoring FAQs*. Typically, there will not be interviews with LEA staff or a monitoring report.

Targeted Monitoring: Targeted monitoring is a review of one or more specific common elements in a particular program, without reviewing the entire work papers. The FDOE usually conducts an onsite visit, with face-to-face interviews with LEA and school level staff as needed. LEAs designated for targeted monitoring are provided an official report of the outcome of the review.

Follow-up Monitoring: Follow-up monitoring is an onsite or desktop monitoring review of the entire work papers for a particular program as a result of recurring or substantial compliance problems. The FDOE usually conducts an onsite visit, with face-to-face interviews with LEA and school level staff as needed. LEAs designated for follow-up monitoring are provided an official report of the outcome of the review.

Appendix B

2012-2013 Risk Score Methodology

Determining Onsite, Desktop and Enhanced Self-Monitoring

Florida's LEAs are monitored intensively using a comprehensive set of compliance items established by the FDOE. The FDOE uses a program-specific, risk-based system of monitoring. Risk Scores are calculated for LEAs separately for each program; therefore, not all programs will review the same LEAs.

Each program's risk assessment starts with the following weighted data-driven general factors:

- The number of years since the last monitoring review;
- The average of district-wide performance, including district grade, graduation rate, proficiency data and learning gains;
- The percentage of program-specific funds expended in the last complete fiscal year (e.g., for the 2013-2014 monitoring review, the fiscal year 2011-2012 was used);
- The number of program-specific audit findings; and
- The number of program-specific findings as a result of the NCLB monitoring process during the last five years.

Each program then determines specific programmatic data-driven factors and adds to the general factors listed above. All factors are assigned a point value and weighted by importance. Since not all LEAs will have data in all of the factors, it is important to determine a total number of points possible per LEA. The risk score is the total number of points earned by a given LEA for each factor divided by the total number of points possible for that LEA. The lower the score, the higher the risk and the more likely an LEA is to be monitored through onsite or desktop review.

The LEAs with the lowest scores in each program are reviewed via onsite, desktop or enhanced self-monitoring. Program offices are responsible for selecting which of the lowest are to be onsite or desktop based on risk. If an LEA falls into the lowest for a program, but the FDOE determines an onsite or desktop review is not warranted, that LEA may be given additional self-monitoring submission requirements, or an "enhanced" self-monitoring to ensure compliance progress is being made. The FDOE may, at its discretion and based on additional program specific factors, select more LEAs per program to monitor onsite or via desktop.

LEAs are notified of their monitoring status and given a reasonable amount of time (at least 30 calendar days) to submit all required monitoring work papers, documentation and the Self-Evaluation Certification. If the FDOE determines an LEA is consistently failing to reach compliance and raise student achievement, the LEA may be monitored in multiple consecutive years.

Appendix C

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) Parental Involvement
(L) Highly Qualified Staff
(M) Supplemental Educational Services
(N) Others as Necessary

Appendix D

Work Papers – Contact Information

Program	Contact Information
Title I, Part A, Improving the Academic Achievement of the Disadvantaged	Sonya Morris, 850-245-9614 Sonya.Morris@fldoe.org
Title I, Part C, Education of Migratory Children	Carol Gagliano, 850-245-0693 Carol.Gagliano@fldoe.org
Title I, Part D Subparts 1 and 2, State and Local Programs for Neglected and Delinquent	Melvin Herring, 850-245-0684 Melvin.Herring@fldoe.org
Title II, Part A, Teacher and Principal Training and Recruiting Fund	Peggy Primicerio, 850-245-0734 Peggy.Primicerio@fldoe.org
Title III, Part A, Language Instruction for Limited English Proficient and Immigrant Students	Chane Eplin, 850-245-5074 Chane.Eplin@fldoe.org
Title VI, Part B, Subpart 2, Rural and Low Income	Jessie Simmons, 850-245-0682 Jessie.Simmons@fldoe.org
Title X, Part C, Education for Homeless Children and Youth	Lorraine Allen, 850-245-0668 Lorraine.Allen@fldoe.org

Appendix E

Self – Evaluation Certification

2013-2014 No Child Left Behind and Selected Florida Statutes Monitoring Self-Evaluation Certification

Local Education Agency:

Programs Self-Evaluated, Contact Information and Outcomes

Program	Compliance Status	Program Contact Information
Title I, Part A, Improving the Academic Achievement of the Disadvantaged	Requirements Met Compliance Item(s):	<i>This box will be populated with the contact information submitted in the online work papers.</i>
	Further Action Required (System Improvement Plan Required) Compliance Item(s):	
	Not Applicable* Compliance Item(s):	
Title I, Part C, Education of Migratory Children	Requirements Met Compliance Item(s):	<i>This box will be populated with the contact information submitted in the online work papers.</i>
	Further Action Required (System Improvement Plan Required) Compliance Item(s):	
	Not Applicable* Compliance Item(s):	
Title I, Part D, Subpart 1, State Programs for Neglected and Delinquent	Requirements Met Compliance Item(s):	<i>This box will be populated with the contact information submitted in the online work papers.</i>
	Further Action Required (System Improvement Plan Required) Compliance Item(s):	
	Not Applicable* Compliance Item(s):	
Title I, Part D, Subpart 2, Local Programs for Neglected and Delinquent	Requirements Met Compliance Item(s):	<i>This box will be populated with the contact information submitted in the online work papers.</i>
	Further Action Required (System Improvement Plan Required) Compliance Item(s):	
	Not Applicable* Compliance Item(s):	
Title II, Part A, Teacher and Principal Training and Recruiting Fund	Requirements Met Compliance Item(s):	<i>This box will be populated with the contact information submitted in the online work papers.</i>
	Further Action Required (System Improvement Plan Required) Compliance Item(s):	
	Not Applicable* Compliance Item(s):	

Title III, Language Instruction for Limited English Proficient and Immigrant Students	Requirements Met Compliance Item(s):	<i>This box will be populated with the contact information submitted in the online work papers.</i>
	Further Action Required (System Improvement Plan Required) Compliance Item(s):	
	Not Applicable* Compliance Item(s):	
Title VI, Part B, Subpart 2, Rural and Low Income	Requirements Met Compliance Item(s):	<i>This box will be populated with the contact information submitted in the online work papers.</i>
	Further Action Required (System Improvement Plan Required) Compliance Item(s):	
	Not Applicable* Compliance Item(s):	
Title X, Part C, Education for Homeless Children and Youth	Requirements Met Compliance Item(s):	<i>This box will be populated with the contact information submitted in the online work papers.</i>
	Further Action Required (System Improvement Plan Required) Compliance Item(s):	
	Not Applicable* Compliance Item(s):	

***If not applicable because the LEA does not participate in this program, please indicate this.**

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:

ofp@fldoe.org

OR

**Florida Department of Education
Division of Public Schools
325 West Gaines Street, Suite 644
Tallahassee, FL 32399-0400**

Appendix F System Improvement Plan Template, Instructions and Samples

No Child Left Behind (NCLB) Monitoring of Local Education Agency (LEA) Programs System Improvement Plan for 2013-2014

___ Self ___ Desktop ___ Onsite

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

Instructions

General: This table is a template of what is generated once all the fields are completed in the online system.

LEA and Date Prepared: The name of the LEA and the date the plan was prepared are **automatically filled** by the system.

Name of Program: The name of the program for which this plan was prepared (e.g., Title II, Part A – Teacher and Principal Training and Recruiting) is **automatically filled** by the online system.

Criterion: This is the compliance item being addressed by the plan. Using the numbers and text from the work papers, it is **automatically filled** by the online system.

Finding(s): These are the LEA’s finding(s) which require the System Improvement Plan. For example, “The LEA should provide private schools with an opportunity for equitable participation.” The finding(s) are **automatically filled** by the online system.

Objective: Explain what the LEA hopes to achieve by implementing the System Improvement Plan. The objective should effectively address each finding listed.

Evidence of Improvement: Specify how the LEA will measure the improvement resulting from implementation of the plan, including the documentation that will support successful implementation. Once the plan is implemented, the evidence specified here should be uploaded to the online system.

Anticipated Date of Completion: Specify the date by which the LEA is committed to successfully achieving the objective (Format: MMDDYYYY). Following this date, the LEA should be able to upload evidence of implementation.

Person(s) Responsible for Implementation of Plan: Specify by name, title, telephone number and email address of each LEA representative who will be responsible for implementation of the plan.

Actions to be Taken, Person(s) Responsible, Timelines:

The **Actions** need to be specific and directly related to achievement of the objective.

Highlight each **Person** responsible for the corresponding **Action**.

Timelines should be specified as a beginning date and a completion date (month and year). The completion date in these timelines cannot exceed the Anticipated Date of Completion (above).

No Child Left Behind (NCLB) Monitoring of Local Education Agency (LEA) Programs System Improvement Plan for 2012-2013

Onsite Desktop Self-Monitoring

LEA: Sunshine School District **Date Prepared:** 2/15/2013

Name of Program: Title I, Part A, Improving the Academic Achievement of the Disadvantaged

Criterion: KIA-8: The Local Educational Agency (LEA) shall:

- conduct with parents an annual evaluation of the content of the LEA's parental involvement policy/plan and its effectiveness in improving the academic quality of schools funded under this part;
- identify barriers to greater participation by parents in authorized activities;
- use evaluation findings to design more effective strategies; and
- revise the parental involvement policy/plan, if necessary.

Finding: KIA-8: The LEA should: provide evidence that the annual evaluation of its parental involvement policy/plan is designed to ensure that such an evaluation will identify barriers to greater participation.

Objective: The LEA will ensure that the annual evaluation of its parent involvement plan is designed to ensure that barriers are identified to prevent greater participation.

Evidence of Improvement: Results from the Title I Annual Parent Survey that evaluates the effectiveness of the Parent Involvement Plan will reflect the identification of barriers that prevent greater participation.

Anticipated Date of Completion: August 31, 2013.

Contact Information for Person(s) Responsible for Implementation of Plan: John Q. Public, Title I Coordinator, 123-456-7890, john.public@sunshine.edu; Suzanne Grants, Title I Parental Involvement Coordinator, 123-456-7891, susanne.grants@sunshine.edu.

Action to be Taken	Person(s) Responsible	Timelines
Design the annual Title I Parent Survey that evaluates the written Parent Involvement Plan to include the identification of barriers that prevent greater participation.	John Q. Public Suzanne Grants	Jan. 2013-May 2013
Administer the evaluation to parents of Title I schools	John Q. Public Suzanne Grants	May 2013-May 2013
Collect completed surveys and compile results.	John Q. Public Suzanne Grants	May 2013-Jun. 2013
Use findings to design more effective strategies for reducing barriers to participation.	John Q. Public Suzanne Grants	Jun. 2013-Aug. 2013

**No Child Left Behind (NCLB) Monitoring of Local Education Agency (LEA)
Programs System Improvement Plan for 2012-2013**

Onsite Desktop Self-Monitoring

LEA: Sunshine School District **Date Prepared:** 2/3/2013

Name of Program: Title I, Part C, Education of Migratory Children

Criterion: HIC-1: The Local Educational Agency (LEA) shall evaluate the project according to specific measurable goals and outcomes and use the results of the evaluation to improve the design of the program and delivery of service.

Finding: HIC-1: The LEA should: provide at least one sample of surveys from a parent, MEP personnel and other stakeholders.

Objective: Establish an annual schedule, process and method to survey migrant parents and students as a component of the MEP evaluation to improve the design of the program and delivery of service.

Evidence of Improvement: The LEA will report survey results in the District Self-Evaluation Report and share survey results with MPAC members in order to develop and implement desired and necessary programs.

Anticipated Date of Completion: 6/30/2014.

Contact Information for Person(s) Responsible for Implementation of Plan: John Q. Public, Coordinator, 123-456-7890, john.public@sunshine.edu

Action to be Taken	Person(s) Responsible	Timelines
The LEA will identify and/or develop and provide as evidence a parent involvement and student engagement survey designed to address Migrant Education Program implementation and evaluation goals.	John Q. Public	Feb. 2014-Apr. 2014
The LEA will randomly select migrant students and parents to participate in surveys.	John Q. Public	Feb. 2014-Apr. 2014

**No Child Left Behind (NCLB) Monitoring of Local Education Agency (LEA)
Programs System Improvement Plan for 2012-2013**

Onsite Desktop Self-Monitoring

LEA: Sunshine School District **Date Prepared:** 2/8/2012

Name of Program: Title I, Part D, Subpart 2, Local Programs for Neglected and Delinquent

Criterion: AID2-3: Any Local Educational Agency (LEA) that receives funds under this subpart shall ensure that formal agreements or contracts with correctional facilities comply with all elements in section 1425 of the NCLB Act.

Finding: AID2-3: The LEA should: ensure that formal agreements or contracts with correctional facilities comply with all elements in section 1425 of the NCLB Act.

Objective: By January of the 2014-2015 school year the LEA will have added the 11 elements of section 1425 of NCLB to the cooperative agreement between the LEA and the Department of Juvenile Justice.

Evidence of Improvement: Upload of amended document to FDOE

Anticipated Date of Completion: 2/8/2012.

Contact Information for Person(s) Responsible for Implementation of Plan: John Q. Public, Federal Programs Coordinator, 123-456-7890, john.public@sunshine.edu; Suzanne Grants, Director, 123-456-7891, susanne.grants@sunshine.edu

Action to be Taken	Person(s) Responsible	Timelines
Amend the cooperative agreement between the LEA and the Department of Juvenile Justice by adding the 11 elements of section 1425.	Suzanne Grants	Nov. 2012-Nov. 2012
Schedule to appear on the Board Meeting Agenda in January.	John Q. Public	Dec. 2012-Dec. 2012
Attend board meeting for approval of the cooperative agreement.	John Q. Public Suzanne Grants	Jan. 2013-Jan. 2013
Send document to FDOE	Suzanne Grants	Feb. 2013-Feb. 2013