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SUPERINTENDENT OF
PUBLIC INSTRUCTION

TO: State Board of Education

FROM: Tom Watkins

DATE: September 9, 2004

**SUBJ: REPORT ON U. S. DEPARTMENT OF EDUCATION
MONITORING**

During the week of June 7-10, 2004, a team from the U. S. Department of Education's (USDOE) Student Achievement and School Accountability (SASA) Programs reviewed the Michigan Department of Education's (MDE) administration of the Title I, Part A and Part B, Subpart 3 programs. On August 12, 2004, the Department received a 24-page report of this visit.

The USDOE commended the Department on its implementation of supporting parental involvement in Title I programs and for providing excellent technical assistance that results in high quality Even Start programs. This acknowledgment and federal and national accolades for other Michigan initiatives, such as our Reading First program (heralded by President George W. Bush) and our acclaimed Grade Level Content Expectations, are indicative of our state's focus and commitment to leaving no child behind.

No Child Left Behind (NCLB) is a new and complex federal law that is continually being clarified. It is a work in progress both at the federal and state levels. Michigan has embraced the moral imperative of the law while working with Congress and national education organizations to modify provisions of the law or to seek clarification. Since NCLB was passed into law, Michigan has been working to implement the law while we advocate for educationally sound changes. We are appreciative of the flexibility the USDOE has recently provided.

The USDOE and the states are working together in a continuous improvement process to refine the law and its implementation. We view this preliminary report by the USDOE as a positive exercise to help Michigan comply with NCLB and use it as a vehicle to continue improving teaching and learning in Michigan's schools. It is important to emphasize once again that MDE

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staff are doing everything possible within the constraints of available resources to comply with and fully implement NCLB in Michigan.

The USDOE report contained areas in which the Department was commended for its work; met the federal requirements; areas in which recommendations were made; and areas in which “findings” indicated improvements needed. This memorandum summarizes the USDOE report.

Summary of U.S. Department of Education Title I Monitoring Report

Commendations		Met Requirements	Recommendations Made	Findings
Title I	1	15	2	12
Even Start	1	28	3	1

Findings:

1. General finding that data system used by the Center for Educational Performance and Information (CEPI) is inadequate to support effective monitoring of Title I implementation (accountability, instructional support and fiduciary requirements) because Title I schools cannot be identified. *(This is a major ongoing project between MDE, DIT, and CEPI).*
2. Accountability findings:
 - a. MDE hasn't published assessment and accountability reports for special education center schools. *(These currently are being prepared and will be issued later this fall. As with other schools, special education center program schools will have an opportunity to review and appeal their report cards before public release.)*
 - b. Documents do not include results from MI-Access in AYP calculations or reports. *(We disagree. Our AYP reports indicate the achievement of students with disabilities We are making modifications to provide a more clear explanation on the website for how MI-Access scores are used.)*
 - c. MDE has not produced a State Report Card that includes all required data elements. *(This is currently in progress and will be issued later this fall with the release of the high school report cards.)*
 - d. MDE has not monitored LEA implementation of school and LEA report card requirements. *(We disagree. Schools are required to submit a monitoring report, including evidence of letters mailed to parents, etc. USDOE states that on-site monitoring is required. On-site monitoring of schools in "restructuring" and "corrective action" is conducted by our ISD partners.)*

3. Instructional support findings:

- a. MDE has not provided adequate guidance to ensure that paraprofessional portfolio assessment reviews are conducted uniformly throughout the state. *(We disagree. A committee has developed criteria for the portfolio and will be conducting additional training sessions in the state this fall.)*
- b. MDE does not have a statewide system of support in place to provide technical assistance to LEAs and schools. USDOE states that our partnership with ISD/RESAs does not constitute a statewide system of support. *(We disagree. We believe that USDOE does not understand that ISD/RESAs in Michigan are public agencies that may be included in the state's technical assistance plan.)*
- c. Delays in AYP/Report Card prevented schools from taking corrective and restructuring actions as required. *(We acknowledge this as an historical problem but we have since improved the system and this year's report cards are being released on time, with the exception of the high school report cards where state statutes prevent us from meeting the NCLB timelines.)*
- d. MDE does not ensure that all Title I school-wide schools have improvement plans that address all 10 required school-wide components. *(We are working to correct this by conducting training sessions and auditing school improvement plans.)*

4. Fiduciary findings:

- a. MDE does not ensure compliance with the comparability requirement of Title I. *(We disagree with USDOE's interpretation that annual comparability calculations be made. We interpret the requirement as being biennial.)*
- b. MDE does not ensure that LEAs maintain appropriate control of Title I programs for private school students. *(We are working to strengthen this through the single audit system.)*
- c. MDE does not have a data system that identifies all Title I schools (districts don't submit data to CEPI as required). *(We are working to strengthen this, with state aid sanctions for schools that do not submit required data.)*
- d. MDE does not ensure that LEAs follow the proper procedures for allocating Title I funding to buildings. *(We disagree. The single audit manual used by auditors annually to audit school districts contains clear procedures for allocating Title I funds and for auditors checking on compliance.)*
- e. MDE does not adequately monitor LEA compliance with Title I fiscal requirements. *(We disagree. We believe the single audit is an appropriate and sufficient audit of Title I fiscal requirements.)*

5. Title I, Part B (Even Start) - finding that a local program was not using a "scientifically based" reading program. *(We are in the process of correcting this.)*