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State Superintendent of Public Instruction



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May 18, 2012

A.J. Grauer, Superintendent
Sheridan School District 48J
435 S. Bridge St.
Sheridan, OR 97378

Dear Superintendent Grauer:

Enclosed please find the staff report from our Elementary and Secondary Education Act (ESEA) Consolidated Program Review of the Sheridan School District. The review was part of the regular monitoring required by Oregon's participation in ESEA and was conducted as a desk monitoring review in Salem in March 2012. In general, the report documents the district's good work and efforts to implement the provisions of ESEA. The Oregon Department of Education (ODE) recognizes that efforts are already underway to ensure Sheridan School District's compliance with ESEA.

The report also lists 7 program findings that will require response and action by the district. These findings indicate the concerns and suggested remedies for providing evidence of compliance to the ODE. Please submit all evidence of compliance, in one package, on or before 60 business days from the receipt of this report. If you have questions or concerns about the findings or the reporting timeline, please contact Melinda Bessner at (503) 947-5626 or by e-mail at melinda.bessner@state.or.us.

Sincerely,

Colleen Mileham, Ph.D.
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Enclosure

Sheridan School District
Final Report: ESEA Consolidated Program Review
March 23, 2012

In March, the Oregon Department of Education (ODE) conducted an Elementary and Secondary Education Act (ESEA) Desk Monitoring of the Sheridan's implementation of the provisions of the ESEA. The review had two main purposes:

1. To assure that the district was in compliance with the law and regulations of ESEA.
2. To provide an opportunity for the district and the ODE team to review current programs supplemented by ESEA funds.

The review included the primary formula grant programs of ESEA including:

- Title I-A: Improving Basic Programs
- Title II-A: Improving Teacher Quality
- Title X: Homeless Education

Another purpose of this documentation review was to assess not only the implementation of the individual programs, but also to examine the coordination and collaboration between ESEA programs and between federal programs and the district's state funded education programs. ESEA requires the coordination of all programs designed to assist with improving academic achievement with a special emphasis on schools identified for AYP school improvement.

The reports for each program are in two sections:

1. Citation: Provides the text from federal or state law that addresses each finding.
2. Finding: Describes issues of compliance that will require response and correction by the district in order to continue to be eligible for ESEA funding. Each finding is accompanied by a description of the required action.

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COMMON COMPLIANCE
Common Compliance Finding A
A-1 Expenditures Reflect Allowable Costs

Citation:

OMB A-133 (B) Allowable Costs/Cost Principles

The written fiscal and administrative requirements must:

- i. be sufficiently specific to ensure that funds are used in compliance with all applicable statutory and regulatory provisions, including ensuring that costs are allocable to a particular cost objective
3. ensure that funds received are spent only for reasonable and necessary costs of the program
4. ensure that funds are not used for general expenses required to carry out other responsibilities of state or local governments (34 CFR section 299.2 [B]).

Citation:

EDGAR 80.20 (A) (B) Standards for Financial Management Systems

The standards for financial management systems must permit the tracing of funds to a level of expenditures adequate to establish that such funds have not been used in violation of the restrictions and prohibitions of applicable statutes.

Grantees and sub grantees must maintain records which adequately identify the source and application of funds provided for financially-assisted activities. These records must contain information pertaining to grant or subgrant awards and authorizations, obligations, unobligated balances, assets, liabilities, outlays or expenditures and income.

Finding:

According to the evidence submitted, some expenditures are not allowable activities under Title I-A. These expenditures were discussed and a copy was left with the district monitoring lead.

Corrective Action:

The district will submit documentation that demonstrates that only allowable expenditures are taken from ESEA funding.

A-3 Supplement/Supplant

Citation:

OMB A-133 2007 Compliance Supplement

2.2 Level of Effort - Supplement Not Supplant (SEAs/LEAs)

ESEA programs in this Supplement to which this section applies are: Title I, Part A (84.010); MEP (84.011); SDFSCA (84.186); 21st CCLC (84.287); Bilingual (84.288, 84.290 and 84.291); Title V, Part A (84.298); Ed Tech (84.318); Title III, Part A (84.365); MSP (84.366); and Title II, Part A (84.367).

General - An SEA and LEA may use program funds only to supplement and, to the extent practical, increase the level of funds that would, in the absence of the federal funds, be made available from non-federal sources for the education of participating students. In no case may an LEA use federal program funds to supplant funds from non-federal sources (Title I, Part A, Section 1120A [B] of ESEA (20 USC 6321 [B]); MEP, Section 1304 (C) (2) of ESEA (20 USC 6394 [C] [2]); Title III, Section 3115 (G) of ESEA (20 USC 6825 [G]); SDFSCA, Section 4113 (A) (8) of ESEA (20 USC 7113 [A] [8]); 21st CLCC, Section 4204 of ESEA (20 USC 7174 [B] [2] [G]); Title V, Part A, Section 5144 of ESEA (20 USC 7217 [C]); Ed Tech, Section 2413 (B) (6) of ESEA (20 USC 6763 [B] [6]); MSP, Section 2202 (A) (4) of ESEA (20 USC 6662 [A] [4]); and Title II, Part A, Sections 2113 (F) and 2123 (B) of ESEA (20 USC 6613 [F] and 6623 [B]).

In the following instances, it is presumed that supplanting has occurred:

- i. The SEA or LEA used federal funds (except Bilingual) to provide services that the SEA or LEA was required to make available under other federal, state or local laws.
 5. The SEA or LEA used federal funds to provide services that the SEA or LEA provided with non-federal funds in the prior year.
 6. The SEA or LEA used Title I, Part A or MEP funds to provide services for participating children that the SEA or LEA provided with non-federal funds for nonparticipating children.

Finding:

According to the evidence submitted, funds from Title I-A were used for supplanting rather than supplementing state and/or locally funded programs.

Corrective Action:

The district will submit for approval documentation to reflect budget corrections to address the supplanting.

Common Compliance Finding J
Highly Qualified Teachers

Citation:

ESEA 1119 (a) Teacher Qualifications and Measurable Objectives

- i. IN GENERAL - Beginning with the first day of the first school year after the date of enactment of the Elementary and Secondary Education Act of 2001, each local educational agency receiving assistance under this part shall ensure that all teachers hired after such day and teaching in a program supported with funds under this part are highly qualified.
 3. LOCAL PLAN - As part of the plan described in section 1112, each local educational agency receiving assistance under this part shall develop a plan to ensure that all teachers teaching within the school district served by the local

educational agency are highly qualified not later than the end of the 2011-2012 school year.

Finding:

The LEA did not submit evidence ensuring that all teachers teaching within the district in core academic subjects are highly qualified.

Corrective Action:

The district must submit to the ODE evidence of the District Highly Qualified Teacher plan and individual teacher plans to ensure that all teachers teaching within the district are highly qualified not later than the end of the 2011-2012 school year. The district will submit master schedules from each school and teacher licensure information for each teacher for the current school year. Complete the ODE HQ template.

For a sample of the individual teacher HQT plan:

http://www.ode.state.or.us/opportunities/grants/nclb/title_ii/a_teacherquality/hqtsampleplan.doc; For a sample of the district HQT Plan:

http://www.ode.state.or.us/opportunities/grants/nclb/title_ii/a_teacherquality/hqtplanappendc.doc.

TITLE I-A: IMPROVING BASIC PROGRAMS

Title I-A Finding Q

Parent Involvement Policy Development and Dissemination

Citation:

ESEA 1118 (A) Parental Involvement and LEA Policy

WRITTEN POLICY- Each local educational agency that receives funds under this part shall develop jointly with, agree on with, and distribute to, parents of participating children a written parent involvement policy. The policy shall be incorporated into the local educational agency's plan developed under section 1112, establish the agency's expectations for parent involvement, and describe how the agency will:

- i. involve parents in the joint development of the plan under section 1112, and the process of school review and improvement under section 1116
2. provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent involvement activities to improve student academic achievement and school performance
3. build the schools' and parents' capacity for strong parental involvement as described in subsection (E)
4. coordinate and integrate parental involvement strategies under this part with parental involvement strategies under other programs, such as the Head Start program, Reading First program, Early Reading First program, Even Start program, Parents as Teachers program, and Home Instruction Program for Preschool Youngsters, and state-run preschool programs

5. conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities authorized by this section (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background), and use the findings of such evaluation to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies described in this section
6. involve parents in the activities of the schools served under this part.

Finding:

The LEA did not submit evidence the parent involvement policy was developed with parents, agreed upon by the parents, and disseminated to parents of Title I and Migrant participating students.

Corrective Action:

The district will submit evidence of meaningful consultation with parents in the development of the parent involvement policy as described in Section 1118 (A) (1) and will provide evidence of parent involvement policy dissemination.

Title I-A Finding V
Parent-School-Student Compact

Citation:

ESEA 1118 (D) Shared Responsibilities for High Student Academic Achievement

As a component of the school-level parental involvement policy developed under subsection (B), each school served under this part shall jointly develop with parents for all children served under this part a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the state's high standards. Such compact shall:

- i. describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the state's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time
- ii. address the importance of communication between teachers and parents on an ongoing basis through, at a minimum:

- A. parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement
- B. frequent reports to parents on their children's progress
- C. reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities.

Finding:

The LEA did not submit evidence that the Title I-A school, with the participation of parents reviews the school parent compact annually and that the school distributes the compact to parents annually.

Corrective Action:

The district will submit evidence, including an agenda and sign-in sheets for parent meetings, to develop and annually review the school parent compact and evidence that the compact was distributed to parents.

TITLE II-A: IMPROVING TEACHER QUALITY
Title II-A Finding A
Collaboration in Planning Title II-A Activities

Citation:

ESEA 2122 (7) LOCAL APPLICATIONS AND NEEDS ASSESSMENT.

A description of how the local educational agency, teachers, paraprofessionals, principals, other relevant school personnel, and parents have collaborated in the planning of activities to be carried out under this subpart and in the preparation of the application.

Finding:

The LEA did not submit evidence of teachers, paraprofessionals, and parents collaborating in the planning of Title II-A funded activities.

Corrective Action:

The district must submit to ODE a description of the process that will be used to ensure that teachers, paraprofessionals and parents are involved in the planning for Title II-A funded activities.

TITLE X: HOMELESS EDUCATION PROGRAM
Title X Finding E
Dispute Resolution Procedure

Citation:

ESEA 722 (G) (3) (E) Enrollment Disputes

If a dispute arises over school selection or enrollment in a school:

- i. the child or youth shall be immediately admitted to the school in which enrollment is sought, pending resolution of the dispute
- ii. the parent or guardian of the child or youth shall be provided with a written explanation of the school's decision regarding school selection or enrollment, including the rights of the parent, guardian, or youth to appeal the decision
- iii. the child, youth, parent, or guardian shall be referred to the local educational agency liaison designated under paragraph (1)(J)(ii), who shall carry out the dispute resolution process as described in paragraph (1)(C) as expeditiously as possible after receiving notice of the dispute
- iv. in the case of an unaccompanied youth, the homeless liaison shall ensure that the youth is immediately enrolled in school pending resolution of the dispute.

Finding:

The LEA did not submit evidence of a homeless student enrollment dispute resolution process.

Corrective Action:

The district will submit to ODE a copy of the district homeless student enrollment dispute resolution process. For information:

<http://www.ode.state.or.us/search/results/?id=113>.