Status and Impact of Performance Audit Recommendations 2007 to 2011

A report by the District Performance Auditor
August 2011

PORTLAND PUBLIC SCHOOLS
Portland, Oregon

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SUMMARY

The School Board established the performance audit function at Portland Public Schools (PPS) to help improve the accountability and performance of the school district. The district performance auditor pursues these goals by conducting independent audits and analysis of district programs and functions in accordance with government auditing standards. This report provides a comprehensive overview of the performance audits conducted since January 2007 and summarizes the status of all audit recommendations.

Over the past 4 and half years, the district performance auditor issued seven audits on a variety of topics and made 50 recommendations to improve conditions identified in the audit reports. As shown in the accompanying table, the district addressed 94 percent of the recommendations – 31 (62%) were implemented and 16 (32%) are in process of implementation. Only three recommendations have not been implemented.

Status of all performance audit recommendations: 2007 to 2011		
IMPLEMENTED	**31**	62%
IN PROGRESS	**16**	32%
NOT IMPLEMENTED	**3**	6%
TOTAL	**50**	100%

Significant changes in response to audit recommendations

Some of the most significant changes made by the district in response to performance audit recommendations include the following:

- Increased instructional time. New 90 minute block schedules at high schools; standardized bell schedules at high schools and K8; increased the student day at K8 schools by 15 minutes; eliminated union contract language that limited the length of the student day.

- Improved management of school building maintenance. Upgraded maintenance management software; consolidated several labor trade shops and increased generalist work force; established maintenance standards for major equipment; developed performance measures for each labor craft
- Established new teacher evaluation system. District and teacher union agreed to implement a revised teacher evaluation system in the 2011-12 school year.
- Increased charter school accountability. Developed clear requirements for charter school annual reporting; instituted a penalty when charter schools are late in providing required financial and performance data
- Moved to a common school calendar. District implementing a single, common quarter calendar for all schools and grade levels in 2011-12.

Remaining opportunities for improvement

There are also some remaining opportunities to more fully address some significant audit findings including:

- Additional effort to expand teacher work-day and increase work load flexibility: The district should continue to negotiate changes in the teacher contract that will increase annual school days and the length of the teacher work-day.
- Actions to improve the effectiveness of after-school tutoring: Pursue waiver of federal rules that reduce the effectiveness of after-school tutoring
- Implement ELL improvement plans: The district needs to transition from planning to implementation of ELL improvement initiatives.

How to obtain performance audit reports

Request by email: rctracy@pps.net

Download from website: www.pps.k12.or.us/departments/board/868.htm

Call: 503-916-3258

Opportunities to Increase the Amount and Quality of Instructional Time
September 2007

Summary of Audit Results

A sufficient amount of well-used instructional time is a critical element in improving student achievement. However, Portland Public Schools provided fewer hours of annual instruction time than other large Oregon districts in 2005-06. Several PPS high schools did not meet State requirements for instructional hours and Portland high school seniors lost over three weeks of instruction due to early dismissal for graduation. Compared to other states, 35 states require over 180 days of instructional annually but PPS provides only 172 days. The audit found opportunities to 1) improve compliance with State instructional time requirements, 2) increase the number of instructional hours provided to students, and 3) use available hours more effectively.

Recommendation	Status	PPS actions
1. Establish and communicate to school area directors and principals clear requirements for calculating and reporting annual instructional hours.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Developed standardized spreadsheet to be completed by each school to prepare school schedules and to enter hours of instruction for each school day • Deputy Superintendents and regional administrators work with school principals in each region to clarify minimum instructional hour requirements and review and approve school schedules
2. Improve monitoring and review of school instructional hour reports.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Ongoing monitoring of school schedules and instructional time minimums by Deputy Superintendents and regional administrators • Director of Grants and Compliance reviewed 2010-11 instructional hour reports for all schools

(continued)

3. Ensure that all high schools meet minimum instructional hour requirements	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Deputy Superintendents and their staff worked with high school principals to develop and verify school year schedules that would result in a minimum of 990 hours of annual instruction as required by ODE • Schedules developed to ensure all grades (9 -12) meet instructional hour minimums
4. Provide reliable and complete information to the public and the Oregon Department of Education.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Director of Grants and Compliance developed required instructional hour targets for individual schools by grade levels and school calendar employed • Instructional hour information will be posted on the PPS website • 2010-11 annual report to ODE gave assurance that PPS complied with state instructional hour minimums
5. Explore opportunities to increase instructional hours at schools by adopting new scheduling techniques and pursuing techniques to optimize instructional time.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Various efforts to increase instructional time include: increased use of block schedules and modified block schedules; reducing travel time for some itinerant teachers; scheduling professional development better; and standardizing high school and K8 bell schedules • Identified authority to increase K8 student day by 15 minutes – potential to increase annual instructional hours by 43 hours
6. Negotiate changes in the current agreement with the Portland Association of Teachers to increase instructional hours and days of instruction.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• 2008-10 contract negotiations eliminated language specifying the length of the student day • 2011-2013 contract increases number of classes taught by high school teachers *(continued)*

		• Negotiating more flexibility in the teacher work day is a high priority in future bargaining sessions
7. Do not reduce instructional hour minimums without specific Board of Education approval.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Board resolution adopting annual school calendar for SY2011-12 included a provision approving reductions in instructional hour minimums as required by OAR
8. Continue to implement existing school district improvement initiatives that research indicates can help the district use time wisely.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Several actions will contribute to the wise use of available instructional time: move to a single school calendar will reduce time lost due to travel and professional development; new teacher evaluation process will support better use of instructional time through professional development; new curriculum will help increase time students are engaged in learning; teacher and student absences are monitored more closely to reduce amount of instructional time lost.
9. Explore new strategies that will further contribute to the wise use of available instructional time and increase the level of engaged learning time in classrooms.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Developed new 90 minute block schedule for high schools that will increase instructional time • Conducted “time audits” in several schools that resulted in changes to the daily bell schedule and increased amount of time students in class • New strategies to increase student engagement at academic priority zone schools • Principals participated in “learning walks” at 5 schools with strong achievement to learn about school structure, schedule, and curriculum.
TOTAL	IMPLEMENTED **8** IN PROGRESS **1** NOT IMPLEMENTED **0**	

Effort Needed to Improve the Capability of School Facility Maintenance Services
March 2008

Summary of Audit Results

The PPS Facility Maintenance department lacked the capacity to conduct an effective and efficient building maintenance program. The department was faced with high and growing workload demands, old buildings and equipment, a demoralized work staff, and incomplete management systems and practices. Most of these conditions were caused by significant budget cuts over the past two decades and the failure to adjust to a changed staffing and funding environment. Consequently, the district does not protect taxpayer investments in capital assets and students and teachers work in environments that are not sufficiently safe and healthy.

Recommendation	Status	PPS actions
1. Update or change the current maintenance management software to add new features.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Tririga maintenance management software was upgraded. New features include data entry by work crews, automated preventive maintenance work orders, better work order cost data, and ability to determine maintenance cost per building.
2. Review key performance measures to determine if current measures are useful to management and relevant for decision makers.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Developed key performance measures by labor craft and are routinely reviewed for relevance to mission, goals, and objectives. Compare performance internally, statewide, and to other districts nationally.
3. Explore opportunities to develop standing purchase orders with vendors for commonly used supplies and equipment.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• District procurement office has adopted new rules and processes for standing vendor purchase orders. Developing new purchasing thresholds and improved internal controls over purchasing supplies. A pilot project is underway to provide better inventory control over various maintenance shop supplies.

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4.	Continue to develop and analyze the fully-loaded hourly costs for each maintenance trade.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Develop fully loaded hourly costs for each trade on an annual basis. Fully loaded costs include direct maintenance, department and district overhead, fringe costs, and equipment depreciation. Analyze work force efficiency.
5.	Continue to explore opportunities to expand generalist labor pool to perform maintenance tasks that do not require a trade union license.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Utilize generalist work force to the fullest extent possible under current labor agreements. • Consolidated several labor trade shops and proposed a new maintenance structure. Future bargaining to increase flexibility.
6.	Continue efforts to improve labor management relations.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• Established a Labor Management Committee (LMC) that meets monthly. All LMC members received training on how to communicate and interact with each other.
7.	Develop a comprehensive manual of operating procedures for the maintenance program.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• Operating Procedures manual is in Second Draft form. Currently under final review prior to implementation.
8.	Prepare master maintenance plan and preventive maintenance schedule.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• Preventive Maintenance program is in place but not yet complete. Continuing to build preventive maintenance standards and requirements. • Preventive maintenance is now scheduled automatically as part of the new software upgrade. Additional capital spending on existing maintenance needs will free staff to address routine and preventive maintenance effort.
9.	Develop a training and professional development plan for management, administrative, and labor work force.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Developed a training data base for all employees that tracks the type and amount of training provided. • Training needs identified by LMC and supervisors, and includes mandated training required by OSHA. Monthly training sessions are conducted for trades and supervisory employees.

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10. Establish performance standards for common and routine maintenance tasks.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Most maintenance standards in place for boiler maintenance, water filters, fire and fire alarm devices, and other requirements. Review and revise standards on an on-going basis. Review and implement standards and benchmarks as a result of participation in a plant operations maintenance consortium.
11. Study current organizational structure and supervisory span of control.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Evaluated the organizational structure and proposed a new structure that will require closer cooperation with maintenance trades. Consolidated some of the trades, increased the breadth of work conducted by other trades, and increased the use of generalists.
12. Consider establishing a formal competitive contracting program to help management make decisions on using maintenance employees or private contractors to perform various maintenance tasks.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Maintenance work requirements are more clearly defined. • New installation and construction is contracted-out to allow existing employees to concentrate on building maintenance. Large maintenance projects that require significant coordination between different crafts are contracted out. Use contracted labor frequently because in-house maintenance staff lacks capacity to meet the on-going maintenance demand.
13. Study opportunities and alternatives for establishing a permanent, ongoing revenue stream to fund capital and major maintenance projects.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Management has developed a plan to address the revenue needs of capital and major maintenance projects. Will require board approval.
TOTAL	IMPLEMENTED 10 IN PROGRESS 3 NOT IMPLEMENTED 0	

Performance Management: Implementation Status of Employee Evaluation Systems

November 2008

Summary of Audit Results

My review of the district's progress in implementing various employee evaluation tools found significant progress in assessing employee performance. Overall, 82 percent of the 4,150 employees that were due evaluations in 2007-08 received a performance appraisal. However, not all employee groups receive evaluations at the same rate – over 90 percent of teachers were evaluated but only 38 percent of principals and administrators received annual evaluations. However, the teacher evaluation tool has not been modified in 28 years and is missing many elements of more progressive teacher evaluation practices.

Recommendation	Status	PPS actions
1. Increase compliance with annual evaluation completion milestones.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Made progress in the number and percent of employees evaluated each year. Very good compliance for teachers, nutrition service workers, and maintenance, bus drivers, and mechanics. Non-represented employees and building administrator evaluations still need improved compliance with the number and timeliness of evaluations.
2. Expand the availability of online, paperless evaluation forms and processes.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Each year more evaluations can be performed using on-line tools. Of the 4300 evaluations completed each year only 300 require paper administration.
3. Assess opportunities and desirability of standardizing the major elements of all evaluation processes.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• Continue to work with union representatives to improve and standardize the evaluation processes. Common formats and ratings are difficult to standardize due to varying job classifications.

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4. Clarify, streamline, and/or simplify various elements of the new non-represented and licensed administrator evaluation process.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐		• Continue to improve and revise the non-represented evaluation tool based on user feed-back – form is shorter, requirements are simpler, and separate forms are available for supervisors and employees. • Reviewing and modifying the building administrator evaluation tool to include student achievement improvements to administrator performance criteria. • Studying the use of Peer Review process for managers and supervisors.
5. Provide additional training and support for employees and supervisors.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐		• HR has created an Evaluation and Performance management website that contains all of the tools and training materials used for different types of employee evaluations. • Increased the number and availability of performance management training opportunities.
6. Consider using my observations about traditional teacher evaluation in discussions about changing PPS's current teacher evaluation process.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐		• The District and PAT finalized a new teacher evaluation system to be implemented in the 2011-12 school year. • District will work with union to determine how evidence of student academic growth will inform instruction and teacher evaluation.
TOTAL	IMPLEMENTED IN PROGRESS NOT IMPLEMENTED	**4** **2** **0**	

Portland Public Charter Schools:
An Assessment of Performance and Impacts
March 2009

Summary of Audit Results

A comprehensive study of the performance and impact of the seven public charter schools operating in the PPS district in 2007-08 identified the following conditions:

- Charter school enrollment grew significantly over an 8 year period – 66 students to over 1,080
- Portland charter schools students are much less likely to be low-income, minority, or English language learners
- Charter school success in improving student achievement is mixed. Schools with elementary age students do as well or better than comparable PPS schools but students in middle school grades perform below PPS students in comparable schools
- Portland charters have comparable attendance rates, teacher/student ratios, and class sizes as PPS schools
- Lack of timely financial reports inhibits the assessment of charter school financial stability
- Little evidence of innovation transfer from charters to public PPS schools
- Charter school parents, staff, and students are highly satisfied
- Charter school student academic achievement is difficult to assess due to the lack of specific, measurable charter contract goals and insufficient annual reporting
- Possible adverse enrollment impact for some neighborhood PPS schools
- Opportunities exist to improve PPS oversight of charter schools to improve accountability and performance

Recommendation	Status	PPS actions
1. Develop more specific and measurable goals for charter school performance.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• Required new charter schools and charter schools undergoing renewal to develop Annual Accountability Plans in conjunction with the PPS Charter School Manager and staff from PPS Research and Evaluation • New Annual Accountability Plans will include specific, measurable, and time-bound goals with a focus on improving student achievement • Goal to implement new Accountability Plans for all charters
2. Design and implement improved methods for monitoring charter school performance in achieving operational and academic goals.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• Annual charter school report to PPS is uniform and standard requiring data on student progress, financial performance, student enrollment and attendance trends, and compliance elements • Developed standard templates for charters to complete when reporting on instructional hours, list of board and staff members, and the school calendar • Plan to develop on-line reporting system but charter school IT capacity is limited

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3. Develop and implement a more rigorous accountability system for monitoring and assessing charter school performance.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐		• Provided clear instructions to charters on the information that charters must provide to PPS each year to demonstrate contract compliance and performance accountability • Instituted a penalty provision for late delivery of required accountability information – can withhold monthly payment. Penalty provision now part of each charter contract. Standardized formal letter sent to charters when not complying with reporting requirements. • Increased reporting requirements for those schools that have had continuing financial stability problems
4. Encourage the State Department of Education to review elements of the charter school legislation.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐		• PPS board member urged ODE and the OR legislature to conduct a 10 year review of the charter school law at various state venues • OSBA created a 10 Year Charter Review Committee chaired by PPS Board member
TOTAL	IMPLEMENTED IN PROGRESS NOT IMPLEMENTED	**2** **2** **0**	

Benefits and Costs of Multiple School Calendars at the Portland Public Schools
September 2009

Summary of Audit Results

During the 2008-09 school year, schools in the PPS district followed three separate school calendars (semester, quarter, and "year-round") and a variety of departures from these calendars such as different start and dismissal times. My audit found that while there are some benefits to the allowed calendar variations, multiple calendars and schedules used by schools result in higher transportation costs, reduced nutrition revenues, and more administrative burden. More importantly, many of the deviations from standard calendars reduced the amount of instructional time provided to students. Compared to other Oregon school districts, PPS offered considerably more flexibility to schools to establish unique and customized calendars and schedules.

Recommendation	Status	PPS actions
1. Discontinue the calendar waiver and contract exception process.	IMPLEMENTED ☐ IN PROGRESS ☐ NOT IMPLEMENTED ☒	• District believes that retaining the option to grant waivers and exceptions to school schedules and calendars provides needed flexibility to the operation of individual schools • Waivers and exceptions are intended to help improve student achievement and are not granted if they increase costs or impact negatively on instructional hours
2. Strongly consider adopting a single common calendar for all school grade levels.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• PPS will initiate a single, common calendar (quarter calendar) for all schools and grade levels beginning in the 2011-12 school year
TOTAL	IMPLEMENTED **1** IN PROGRESS **0** NOT IMPLEMENTED **1**	

Supplemental Educational Services: Overall Compliance with Requirements but Opportunities Exist to Improve Effectiveness
February 2010

Summary of Audit Results

The district provides Supplemental Education Services (SES) in accordance with the federal No Child Left Behind Act (NCLB) to help improve the academic achievement of low-income students by providing after-school tutoring. The audit found that the district administers the program in compliance with federal requirements but private tutors demonstrated mixed compliance with contract provisions. In addition, we found that SES tutoring has a very modest measurable impact on improving the academic achievement of participating students. SES tutoring could have a more positive impact on improving student achievement if tutoring sessions were delivered to students with significant academic deficits, in small groups, and with a sufficient duration. These changes would require waivers of some federal program requirements and changes in existing contracts with providers.

Recommendation	Status	PPS actions
1. To increase participation, place SES information on the PPS website so that parents and other interested parties have more access to information on tutoring services offered by providers.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Updated PPS SES webpage to include the current SES application packet in six different languages • New webpage also includes information on the history of SES service delivery at PPS
2. Make more effort to give SES providers additional information on the educational needs of SES students that have special education needs so that providers can tailor services and make accommodations to meet special needs.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Modified the SES Provider Selection Form that is approved by parents that PPS will share pertinent academic information with providers such as teacher names, test scores, attendance, and IEP information to help the provider to tailor tutoring services to student needs.

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3.	Ensure that new regulations effective this fiscal year relating to reallocation of unused SES funding are fully addressed.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• PPS has not reallocated unused SES resources in the past two years • SES program uses various community resources to inform parents about the availability of SES tutoring services as required by federal regulations
4.	Review methods for identifying SES eligible students to ensure that only eligible economically disadvantaged students receive SES services.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Implemented new SES software to ensure all students who receive SES services are eligible
5.	Implement data base software to more efficiently and effectively manage and monitor provider data on student enrollment, attendance, participation, and progress.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Implemented new SES software to ensure that SES can manage provider data on student enrollment, attendance, participation, and progress
6.	Develop better processes to ensure that student goal statements prepared by providers are timely, complete, and student specific. PPS management should encourage teachers to communicate with providers about the unique educational needs of student SES participants.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• SES Manager met with each tutor provider to explain and review PPS expectations regarding student goal statements • SES Manager met with each school principal to ask them to encourage teachers to inform parents about the benefits and opportunities of after-school tutoring
7.	Clarify in provider agreements the specific types of activities that can be billed by providers in provision of SES services. More rigorous review of provider invoices should also help identify overcharges and billings for unallowable services.	IMPLEMENTED ☒ IN PROGRESS ☐ NOT IMPLEMENTED ☐	• Modified contract language in tutorial provider agreements to be more specific about what services are allowed to be billed • New software will not allow provider bills for amounts that exceed the annual cap amount and will ensure students are only enrolled in one tutoring program

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8.	Encourage providers to increase the number of hours of tutoring instruction to at least 40 hours each year and provide Reading tutoring using one-on-one instruction and Math tutoring small groups not exceeding 5 students to one tutor. PPS should consider allocating additional unused SES funds to support increased number of sessions.	IMPLEMENTED ☐ IN PROGRESS ☐ NOT IMPLEMENTED ☒	• District believes that encouraging providers to increase tutoring duration and reduce participant group size will require renegotiation of existing contracts and waivers from existing federal regulations
9.	Collaborate with the Oregon Department of Education and Oregon providers to develop a common assessment tool to be used by all providers to assess achievement gains resulting from SES services at PPS.	IMPLEMENTED ☐ IN PROGRESS ☐ NOT IMPLEMENTED ☒	• District has expressed to ODE their interest in creating a statewide technical assistance system but ODE has not responded • Development of a common assessment tool might require federal regulation waivers
10.	Collaborate with teachers in low performing schools to encourage the parents of disadvantaged students with significant academic deficits to enroll their children in SES tutoring. Collaborate with Oregon Department of Education to explore options for giving more priority to those students in low performing schools that have significant academic deficits and special education needs.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• Implemented special referral process that permits teachers to enroll eligible and academic needy students in SES during parent/teacher conferences • Need federal waivers to give priority to students that have significant academic needs
11.	Coordinate and collaborate with SES providers to develop specific achievement goals and timetables for completion for each student participant depending on their unique needs and academic achievement status.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• Worked with school principals to encourage teachers to give providers feedback to ensure specific tutoring goals are set for each student • New software will ensure that providers cannot bill for students that do not have an approved achievement goal

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12. Explore opportunities to implement pilot programs for the delivery of SES services at PPS that demonstrate optional delivery methods and more tailored and focused attention on students with the greatest academic deficits. PPS would need to obtain approval from federal education authorities to pursue some of these new delivery methods.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• Implemented pilot project at Roosevelt HS to encourage stronger alignment of SES tutoring services with the school day • Working with providers to attend a standing meeting with teachers to review SES participant goals and to assess progress
TOTAL	IMPLEMENTED 6 IN PROGRESS 4 NOT IMPLEMENTED 2	

English Language Learners: Action Needed to Improve Program Compliance and Performance
October 2010

Summary of Audit Results

PPS has been out of compliance with federal and state rules governing the provision of services to English Language Learners for 13 of the past 17 years – 80 percent of the time between 1994 and 2010. The district has had recurring problems delivering English language proficiency instruction, providing ELL student access to core academic classes, and identifying eligible students. Additionally, the district has had only modest success helping students achieve English language proficiency and in closing the achievement gap between ELL and non-ELL students. PPS has not made a strong commitment to improve ELL instruction nor implemented rigorous methods to monitor performance and strengthen accountability for results. The district needs to develop clear and consistent guidance to schools and improve collaboration in the delivery of ELL services.

Recommendation	Status	PPS actions
1. Develop and implement an ELL improvement initiative.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• School Board resolution declares that improving ELL services is an urgent priority for PPS. Directs Superintendent to respond to audit and prepare an action plan to rectify conditions identified in the audit. • Task Force created to make long and short-term recommendations for departmental changes
2. Establish a strong monitoring and accountability system for the ELL program.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• District developed new process for developing and implementing School Improvement Plans that increases school and principal accountability for school performance. • Other monitoring and accountability systems to be implemented under the direction of the newly hired ESL Director.

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3.	Provide better support and guidance to schools on their roles and responsibilities for ELL instruction.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• Initial steps to improve support and guidance to school are underway. Implementation will be under the direction of a new Director of ESL starting July 2011. • Developed a sheltered instruction professional development plan for 2010 -2012
4.	Strengthen collaboration among the various parties that provide ELL program services.	IMPLEMENTED ☐ IN PROGRESS ☒ NOT IMPLEMENTED ☐	• Created an ESL Leadership Committee (ESL Oversight Committee) comprised of all parties that have an interest and involvement in the improvement of services to ELL students. Committee participated in the selection of the new ESL Director.
TOTAL		IMPLEMENTED **0** IN PROGRESS **4** NOT IMPLEMENTED **0**	

METHODOLOGY

According to PPS Board Policy 1.60.040-P that established the District Performance Auditor, the auditor is required to follow-up on audit recommendations as practical to determine if responsible officials are implementing corrective action. To accomplish this follow-up the auditor may request periodic status reports from audited entities regarding the actions taken to address reported deficiencies and audit recommendations.

To obtain information on the status of the implementation of audit recommendations, a request for information is sent to responsible officials six months after the initial release of the audit report. The request for information asks for the current implementation status of each recommendation contained in the audit report to determine if the recommendation has been:

IMPLEMENTED, or is

IN PROGRESS, or is

NOT IMPLEMENTED.

In addition, program officials are asked to provide supporting documentation for the actions taken to address the recommendations. The supporting documentation generally consists of written policies and procedures, statistics and spreadsheet data, board resolutions and policies, and official reports. Additional support is obtained through oral testimony and interviews.

The auditor also asks program officials to update the status of the initial 6 month reports every year or two so that the auditor can maintain a current record of the progress toward implementation of recommendations. The auditor does not perform additional audit work to verify or confirm testimony or supporting documentation provided by program officials.