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August 5, 2010

The Honorable Judy Burges, Chair  
Joint Legislative Audit Committee

The Honorable Thayer Verschoor, Vice Chair  
Joint Legislative Audit Committee

Dear Representative Burges and Senator Verschoor:

Our Office has recently completed a 24-month followup of the Arizona Department of Education's implementation status for the 4 recommendations presented in the *Baseline Study of Arizona's English Language Learner Programs and Data*, released in April 2008. As the attached grid indicates:

- 1 recommendation has been implemented; and
- 3 recommendations are in the process of being implemented.

Unless otherwise directed by the Joint Legislative Audit Committee, this report concludes our follow-up work on the implementation of these recommendations.

Sincerely,

Ross Ehrick, CPA  
Director, Division of School Audits

RE:bl  
Enclosure

cc: Tom Horne, Superintendent of Public Instruction  
Arizona Department of Education

# Baseline Study of Arizona's English Language Learner Programs and Data

## Special Study Issued April 2008

### 24-Month Follow-Up Report

#### Recommendation

#### Status/Additional Explanation

### CHAPTER 1: Characteristics of ELL programs and participants

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No Recommendations

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### CHAPTER 2: ELL data and data systems need attention

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1. To ensure the accuracy of ELL data, ADE should work with districts and charter schools to develop improved data submission and review processes.

#### **Implemented at 24 months**

To improve the data submission process, the Arizona Department of Education (ADE) has changed how it receives student-level Arizona English Language Learner Assessment (AZELLA) data. Prior to fiscal year 2009, districts and charter schools collected AZELLA results from the test publishing, scoring, and reporting vendor and then submitted the data to ADE's Student Accountability Information System (SAIS). In fiscal year 2009, ADE began receiving this data directly from the vendor. According to ADE officials, the vendor is currently working to correct less significant data submission problems identified by ADE, such as erroneous test dates. To further improve the data review process, ADE conducted formal reconciliation workshops in the fall of 2009.

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2. To ensure proper ELL program funding, ADE should add ELL integrity checks that require proper achievement data. ADE should not provide funding for students without such data.

#### **Implementation in process**

In fiscal year 2010, ADE added an integrity check within SAIS that provided an error message when a student's ELL program participation is not supported by an appropriate AZELLA score. Auditors reviewed a sample of student participation and found that the error message worked properly for most of the students tested. However, in a few cases, the integrity check failed to identify students who had tested as proficient prior to participating in the program. These students appear to have participated in the program and may have been inappropriately included in the program funding counts.

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**Recommendation****Status/Additional Explanation**

3. To improve data accuracy and auditability, ADE should implement process controls that enable users, ADE, and the Auditor General to compare data totals at critical points in the process, such as a list of students included in funded participation counts.

**Implementation in process**

ADE has made significant progress in developing critical process controls, such as lists of students included in program funding counts. However, according to ADE officials, because SAIS was designed to track Average Daily Membership, other integrity checks needed are outside the capability of the existing SAIS system. For example, systems that track program eligibility are not fully integrated with those that determine funding counts, so SAIS cannot always ensure that program funding counts only include eligible program participants. ADE officials also report that they do not currently have the significant resources needed to rewrite SAIS to expand its capabilities but continue to develop ways to improve accuracy.

4. To assist with analyzing ELL outcomes, ADE should consider collecting additional data that describe how a program is implemented, such as teacher qualifications and staffing levels.

**Implementation in process**

In fiscal year 2009, ADE's Office of English Language Acquisition Services (OELAS) monitoring staff began collecting additional information about district and charter school ELL staff during their ELL program monitoring visits. During their statutorily-mandated monitoring visits to 32 districts each fiscal year, OELAS staff review a sample of teacher files and class rosters for compliance with the ELL model's requirements for teacher qualification and class size. According to ADE officials, on a statewide basis, ADE plans to incorporate teacher information into SAIS in future phases of ADE's Data Warehouse project.