



**Office of Inspector General
Bureau of Federal Education Programs
Title I, Part A Grant Application Process**

Report # A-1819DOE-032

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Executive Summary

In accordance with the Department of Education’s fiscal year (FY) 2019-2020 audit plan, the Office of Inspector General conducted a consulting engagement with the Bureau of Federal Education Programs (BFEP) regarding the Title I, Part A grant application process. The purpose of this consulting engagement was to assist BFEP in developing procedures to effectively process grant applications for Title I, Part A grants in accordance with laws, rules, and regulations. BFEP is responsible for processing and approving Title I, Part A grants to ensure that all legally prescribed components are in place and designed to help economically disadvantaged students. We initiated a consulting engagement to analyze and advise on the controls, policies, and processes in place related to the BFEP Title I, Part A grant application process. We reviewed the risk assessment, BFEP grant application checklists, and the overall process for reviewing and approving Title I, Part A grants for the period of July 1, 2017, through July 30, 2019. At the conclusion of our review, we provided guidance to BFEP for process improvements as presented in this report.

Scope, Objectives, and Methodology

The scope of the engagement included an examination of the Title I, Part A grant applications for the period of July 1, 2017, through June 30, 2019. The objective of this engagement was to determine whether BFEP had an effective process in place to review and approve applications for Title I, Part A grants in accordance with laws, rules, and regulations. To accomplish our objective, we reviewed applicable laws, rules, and regulations; reviewed policies and procedures; interviewed appropriate staff; reviewed the application process; and reviewed a sample of applications and related documents.

Background

The Bureau of Federal Education Programs (BFEP) provides technical assistance, program support, and monitoring to local educational agencies (LEA) that lead to improved academic achievement outcomes, enhanced classroom instructional strategies that promote rigor and relevance throughout the curriculum, and students prepared for continuing education and the workforce. BFEP is responsible for adhering to state and federal guidelines regarding Title I, Part A, to ensure that all legally prescribed components are in place to increase student achievement.

Title I, Part A provides LEAs additional resources that help disadvantaged students gain a high-quality education and the skills to master the Florida Standards. These resources are used to provide additional teachers, professional development, extra time for teaching, parent involvement activities, and other activities designed to raise student achievement. Two models are used in Title I schools to provide these services. School-wide reform models provide all students with access to services. Targeted assistance models provide services to select students in Title I schools.

No Child Left Behind (NCLB) was enacted in 2002 to ensure that all eligible students have a fair, equal, and significant opportunity to obtain a high quality education and reach, at a minimum, proficiency on challenging state academic achievement standards and state academic assessments. The federal law provided money for extra educational assistance for low-income students in return for improvements in their academic progress.

The Every Student Succeeds Act (ESSA) was signed in 2015, replacing NCLB. ESSA seeks to grant flexibility to states regarding specific requirements of NCLB in exchange for rigorous and comprehensive state-developed plans designed to close achievement gaps, increase equity, and improve the quality of instruction. ESSA includes provisions designed to ensure success for students and schools such as:

- Advancing equity by upholding critical protections for America's disadvantaged and high-need students;
- Requiring – for the first time – that all students in America be taught to high academic standards that will prepare them to succeed in college and careers;
- Ensuring that vital information is provided to educators, families, students, and communities through annual statewide assessments that measure students' progress toward those high standards;
- Helping to support and grow local innovations – including evidence-based and place-based interventions developed by local leaders and educators – consistent with the Investing in Innovation and Promise Neighborhoods;
- Sustaining and expanding the historic investments in increasing access to high-quality preschool; and
- Maintaining an expectation that there will be accountability and action to effect positive change in our lowest-performing schools, where groups of students are not making progress, and where graduation rates are low over extended periods of time.¹

In 2018, the department contracted with Manasevit and Brustein, PLLC, Attorneys at Law, to evaluate the FDOE Title I, Part A, grant applications. The law firm provided a document to the department on April 4, 2018, containing broad feedback intended to serve as the starting point for streamlining the application process. The feedback identified eight areas of concern. The firm directed feedback at reducing redundancies for required items in the grant applications. They observed that the collection of information on test score trends and future test score predictions in the Project Evaluation area is not legally required by the federal government and may be worth eliminating from the application. They also stated the level of detail requested in the application is not required in select implementation narratives and stated BFEP should consider whether all information is necessary. BFEP did not have sufficient time to complete corrective actions on

¹ Every Student Succeeds Act – U.S. Department of Education
<https://www2.ed.gov/policy/elsec/leg/esea02/pg2.html>

these areas during the scope of our audit. However, we reviewed these areas in the FY 2017-2018 and FY 2018-2019 applications as part of the consulting engagement.

For FY 2017-2018, Title I, Part A preliminary grant funding was \$856,922,638, and final grant funding to LEAs was \$789,578,887. For FY 2018-2019, preliminary grant funding was \$853,441,665, and final grant funding to LEAs was \$786,441,513.²

Current Processes

Grant Applications Process Timelines:

34 CFR 76.301 of the U.S. Department of Education (USDOE) standards requires local education agencies (LEAs) to submit Title I, Part A, grant applications. BFEP is responsible for reviewing the grant applications and ensuring the applications meet the requirements established in laws, rules, and regulations. During FY 2017-2018 and FY 2018-2019, 76 LEAs submitted applications for the Title I, Part A program.

Per department staff, to prepare Title I allocations, it is necessary to have the original allocations from the USDOE as well as survey enrollment and poverty data. The department uses the best available numbers for the allocations when drafting and releasing the annual Request for Applications (RFA). Ideally, if USDOE has provided the final allocations at the time the RFA is scheduled for release, the department will calculate the final allocations to include in the RFA. If the final allocations have not been released, the department will calculate the preliminary allocations for the release of the RFA and update to final allocations when that becomes available. If the preliminary allocations have not been released from USDOE, the department will use the prior year final allocations as the basis for the preliminary allocations. BFEP obtains survey and poverty (free and reduced price lunch) data from the department's Office of Education and Information Services (EIS). BFEP will use final survey 3 data if it is available, otherwise they will use preliminary survey 3 data. BFEP provides the USDOE allocations and EIS data to the Office of Grants Management (OGM), and OGM prepares the allocations. BFEP drafts and routes the RFA packet for preapproval, including the allocations calculated by OGM.

For FY 2017-2018, BFEP received congressional notification of the Title I, Part A allocations on May 26, 2017. BFEP submitted the RFA to OGM for review and calculations on the same day as the notification from the USDOE. The RFA was approved by the Commissioner on June 23, 2017, 21 business days after submittal. For FY 2018-2019, BFEP received congressional notification of the Title I, Part A allocations on April 17, 2018. BFEP submitted the RFA to the OGM for review and calculations on February 27, 2018. In order to review and approve applications prior to September 30, 2019 (when the conditional release expires), the department made an effort to release RFAs for entitlement programs early, using prior year allocations as the basis for preliminary allocations. The RFA was approved by the Commissioner on June 4, 2018, 70 business days after submittal. We requested an explanation for the delay of approval in FY 2018-2019 and were informed by OGM staff, the RFA was conditionally approved pending required

² The total preliminary award includes the allocations to LEAs, the school improvement reservation and state administration.

corrections. However, the corrections were not completed until May 2, 2018. Due to changes in Title I management, we were unable to obtain an explanation for the delay by BFEP.

Upon approval of the RFA, BFEP opened the online application tool and notified the districts that applications may be submitted. BFEP allowed the districts one month to submit their Title I, Part A, applications. Once the districts submitted their applications, OGM completed intake of the applications and forwarded the applications to BFEP. The intake process included establishing the effective date of the application; inputting the application into the tracking system; ensuring the entity is an eligible applicant; verifying that the correct agency head (i.e., superintendent or designee) has signed the application; verifying the required documents (the conditions for acceptance) have been submitted; and ensuring for new entities, steps are taken to properly onboard them. BFEP staff reviewed the districts' applications upon submission in the order received. For FY 2018-2019, BFEP set a goal to approve 80% of the applications by September 30, 2018, and all remaining applications by October 31, 2018. In contrast, the DOE leadership team requested all approvals to be completed by the end of September 2018.

We analyzed data from all 76 grant applications that BFEP reviewed and approved during FY 2017-2018 and FY 2018-2019, to determine the processing time for the Title I, Part A grant applications. We determined the grant application processing times were reduced from FY 2017-2018 to FY 2018-2019. The average number of total business days for grant applications review fell from 118 days in FY 2017-2018 to 86 days in FY 2018-2019, a 27 percent reduction in processing times. The average number of business days for programmatic review by BFEP analysts was also reduced from 86 days to 71 days from FY 2017-2018 to FY 2018-2019, a 17 percent reduction in processing times. Additionally, the average number of business days for review by OGM was reduced from 24 days in FY 2017-2018 to 15 days in FY 2018-2019, a 37 percent reduction in processing times.

Although the grant application timeframes were reduced from FY 2017-2018 to FY 2018-2019, BFEP did not meet their internal goals to approve 80% of the applications by September 30, 2018, and to approve all applications by the end of October 2018, nor did they meet the leadership goals to approve all applications by the end of September 2018. See Table 1.

Table 1

Applications Approved and Released							
Timeline	August	September	October	November	December	January - April	Total
FY 2017-2018							
# of Applications Approved and Released	0	0	0	27	46	3	76
% of Applications Approved and Released	0%	0%	0%	36%	96%	100%	
FY 2018-2019							
# of Applications Approved and Released	3	7	40	25	1	N/A	76
% of Applications Approved and Released	4%	13%	66%	99%	100%	N/A	

We selected seven LEAs for a detailed review of the grant applications process for FY 2017-2018 and FY 2018-2019. Grant applicant selections included the following school districts: Desoto,

Hillsborough, Leon, Marion, Orange, Okaloosa and Suwanee. During FY 2018-2019, BFEP staff completed a risk assessment for the 76 districts, based on the FY 2017-2018 data. Among the selected sample, Desoto, Leon, Marion, and Orange County School districts were considered high risk. Hillsborough and Suwanee were considered medium risk. Okaloosa County School district was considered low risk.

FY 2017-2018 Sample

We reviewed the seven grant applications to determine the processing times as the grants progressed through the various levels of review by the BFEP Program Office and the OGM. We also determined the internal processing times for BFEP analysts to conduct their programmatic reviews of the grant applications. For the seven county school district grant applications reviewed, OGM completed the intake of applications between 16 and 21 days from receipt.

The BFEP analysts utilized an application checklist to document the review of the applications. We observed that four of the seven sampled applications contained notes by the analyst indicating the initial review date and the date the analyst made comments on the application checklist. The remaining three grant applications contained analyst comments; but did not contain dates the edits and comments were made, dates the analyst requested additional documentation, or dates the districts completed corrective actions. Of the four applications that contained edit dates, three included the date of the correction. The number of days between analysts' initial comments and subsequent corrections ranged between 18 and 44 days for the three applications where the analyst made such recordings. We were unable to determine the timeline for the remaining four grant applications that did not contain dates. The practice of not consistently including dates of review, requests for additional documentation, and dates of LEA responses prevents the program office from determining whether an application is being delayed unnecessarily by the LEA or whether the application has been delayed in the program office. Consequently, the program office will be unable to determine a strategy to more efficiently complete the reviews of the applications and identify the inefficiencies and potential bottlenecks in the review process.

FY 2018-2019 Sample

We reviewed the seven grant applications to determine the processing times as the grants progressed through the various levels of review by the BFEP Program Office and the OGM. We also determined the internal processing times for BFEP analysts to conduct their programmatic reviews of the grant applications. The applications are received by OGM and forwarded to BFEP once intake has been completed. For three of the seven county school district grant applications reviewed, OGM completed the intake of applications between 2 and 7 days from receipt. Due to the unavailability of complete review history data in the FLAGS system, we were unable to view the dates OGM completed the intake for four of the selected applications; including Desoto, Leon, Okaloosa, and Suwanee Counties.³

³ FLAGS contains history pages that include grant approval dates. Access to the history pages was limited to page 1 due to an error in the system. Lacking access to subsequent pages prevented us from determining when grants were received and approved in the FLAGS system for select applications.

BFEP analysts reviewed the districts' applications upon submission, in the order received. The analysts utilized an application checklist to document the review of the applications. We observed that two of the seven sampled grant applications contained notes by the analyst indicating the initial review date and the date the analyst made comments on the application checklist. The remaining five grant applications contained analyst comments, but did not contain dates the comments were made, dates the analyst requested additional documentation, nor dates the LEA completed corrective actions. The number of days between the analysts' initial comments and the receipt of the districts' subsequent corrections were 22 and 25 business days for the two applications where the analyst made such recordings. We were unable to determine the timeline for the remaining five grant applications which did not contain dates in the analyst notes.

We noted the BFEP analysts did not consistently document the dates of review, the dates they made comments, the dates they requested additional information from the LEAs, nor the dates when the LEAs completed corrections during the programmatic reviews. Tracking comments by BFEP analysts allows management to determine the time required to receive responses from the school districts in response to issues raised by the analysts. Tracking of comments would also illustrate the differences in grant processing times between larger and smaller school districts. This could allow for strategic investment of grant application analyst resources in the event that certain grants have a greater likelihood to be delayed, given the size of the school district and the volume of edits that must be corrected. In addition, detailed tracking would allow BFEP management to identify areas of inefficiency and determine where grants may be delayed in the process and opportunities for improvement. Identification of the inefficiencies could then be used to direct training resources. Absent managerial information to identify efficiencies and improvement opportunities, resources may not be employed in the most effective or strategic manner.

Per BFEP management, five positions are devoted to reviewing grant applications. As of October 2019, four of five staff positions were filled and one was vacant. Two of the BFEP analysts were primary contacts for the school districts and coached the other two team members. Tracking staff timeliness and the number of corrections needed by each BFEP analyst would reveal whether additional investment in grant review staffing or training would alleviate grant application processing delays.

Recommendations:

We recommend that BFEP develop detailed internal tracking mechanisms for monitoring the processing of school district grant applications. At a minimum, this should include recording key milestones and dates for reviewing and editing grant applications by BFEP analysts and the corresponding correction and resubmission by the school districts. An enhanced internal tracking mechanism could assist BFEP in identifying where application processing delays take place and assist BFEP management in more effectively allocating its available staff resources.

We recommend establishing timeframe expectations for the application review process including initial review timeframes for the BFEP analysts, timeframes for communicating with the LEAs, and timeframes for supervisory review. We recommend training the BFEP staff in the area of grant application reviews to ensure applications are reviewed and processed in a consistent manner. In addition, cross training staff across federal programs and utilizing additional employees to conduct reviews could reduce the timeframe to review and approve applications.

Further, identifying school districts with consistent application delays could assist the bureau in how it provides its annual training and technical assistance to the identified districts with respect to Title I, Part A.

Programmatic Requirements:

We reviewed grant applications for Title I, Part A, to determine if all required elements were included in each application, in compliance with federal law. The following Areas of Focus were included in the Request for Applications:

1. Strengthening Academic Achievement – 6 elements
2. Parent and Family Engagement Plan (PFEP) – 17 elements
3. Homeless Education – 5 elements
4. Neglected and Delinquent Education – 5 elements
5. LEA-Wide and District Initiatives – 5 elements
6. Comprehensive and Targeted Support of Schools – 5 elements
7. Early Childhood Services – 5 elements
8. Private Schools – 5 elements
9. Foster Care – 4 elements
10. College and Career Readiness – 6 elements
11. Targeted Assistance – no elements; may not be applicable to all districts
12. Technology – 5 elements
13. District Determined Focus – 5 elements, may not be applicable to all districts

We determined all thirteen required Areas of Focus were included in the seven sampled grant applications for FY 2017-2018 and FY 2018-2019. Additional requirements for FY 2018-2019 included items such as Coordination of Federal Programs and Participative/Collaborative Partners; Reporting Requirements/Information Dissemination; Supplement, Not Supplant provisions; Non Public School Eligibility; Description of LEA Activities to Support Required Reservations; and the Public School Eligibility Survey. These stipulations are also contained in the RFA submitted by BFEP to the OGM for FY 2018-2019. We found BFEP included all thirteen required Areas of Focus on the FY 2017-2018 and FY 2018-2019 application checklists. The FY 2018-2019 checklists also contained the additional six requirements identified above.

We analyzed the number of edits and corrections made by BFEP analysts for the seven grant applications reviewed in FY 2017-2018 and FY 2018-2019. We reviewed all edits by Area of Focus, by elements within those Areas of Focus, and by other program requirements. Among the thirteen required Areas of Focus, for the seven grant application checklists reviewed, Strengthening Academic Achievement, Area of Focus 1, and Parent and Family Engagement Plan, Area of Focus 2, contained numerous edits. Because Area of Focus 2, included seventeen elements, it contained the most edits of all of the Areas of Focus, ranging from 1 to 13 edits or corrections per application. Area of Focus 1, contained between 0 and 7 edits or corrections per application. For the budget category, 12 of 14 grant applications contained one or more edits or corrections, and 8 of 14 grant checklists included edits to four to six elements. In addition, the Public School Eligibility Survey (PSES) contained edits or corrections for all fourteen grant applications reviewed. By illustration, the Marion County grant application checklist, for FY 2017-2018, had edits or corrections in all ten elements of this survey. See Table 2.

Table 2
Total Edits and Corrections by
Area of Focus or Other Elements

Area of Focus	FY 2017-2018	FY 2018-2019
AOF 1 – Strengthening Academic Performance	18	23
AOF 2 - Parent and Family Engagement	44	43
Public School Eligibility Survey (PSES)	36	20
Budget	26	22

Though the checklists contained 21 overall categories, including Areas of Focus and other programmatic requirements, some areas were frequently marked as ‘Not Applicable’ by the school districts in their applications. These included the following Areas of Focus:

- Area of Focus 5 for LEA-Wide District Initiatives; 6 of 14 grant applications
- Area of Focus 6 for Comprehensive Targeted Support; 7 of 14 grant applications
- Area of Focus 11 for Targeted Assistance; 11 of 14 grant applications
- Area of Focus 13 for District Determined Focus; 12 of 14 grant applications

Concerning the total number of elements edited or corrected within the required Areas of Focus and program assurances, Table 3 quantifies edits and corrections by grant application.

Table 3
Total Number of Elements with Corrections
By County School District
By Fiscal Year

Grant Applicant	Fiscal Year 2017-2018	Fiscal Year 2018-2019
Orange County S.D.	59	45
Okaloosa County S.D.	53	27
Desoto County S.D.	32	37
Suwanee County S.D.	32	23
Marion County S.D.	26	24
Leon County S.D.	25	28
Hillsborough County S.D.	23	6
Total Elements with Edits	250	190
Note: Hillsborough S.D. in 2018-2019, only registered one Area of Focus: AREA OF FOCUS 6		

As illustrated in Table 3, there has been overall improvement for most of the sampled school district grant applications. Five of seven districts saw reductions in the number of edits. The total number of edits to be addressed, as noted by BFEP analysts, declined overall.

The analysis highlighted four programmatic areas of grant application reviews that had a disproportionate share of edits by BFEP analysts. These included two areas of focus— Strengthening Academic Achievement and Parent and Family Engagement Plan – as well as the Public School Eligibility Survey requirement. The final area that produced a disproportionate number of edits was the budget line items. Budget line items are required in Areas of Focus 1 through 6 and Areas of Focus 10 through 13. Part of this is due to the number of elements and sub-elements covered by these areas. Parent and Family Engagement has 17 elements that must be checked by BFEP analysts as part of the grant application programmatic reviews. Given this trend, a strategic investment in training resources to address these four areas could strengthen the knowledge of these programmatic areas for grant applicants, reducing the number of potential edits by BFEP analysts and subsequent corrections.

We additionally noted in the FY 2018-2019 application reviews that BFEP analysts occasionally marked a sub-item on the application checklist as “no” indicating the requirement had not been met, but did not request additional documentation from the LEA or provide any notes as to why the sub-item had been marked as such. For example, we noted during the review of the Orange County application that BFEP staff marked several lines as “no” on the checklist for Area of Focus 5, Education Services Funded. The BFEP analyst provided no explanation or comment and ultimately approved the application with the information missing.

Per BFEP staff, this could be an error, the specific item could be not applicable to the program, or it could be an item that is not a requirement to approve the application so it does not receive extra scrutiny. If areas are deemed as negotiable and do not require information from the LEA, BFEP may not need to include these elements in the application. As mentioned in the previous consultation report, identifying areas of duplication and non-required information could assist in streamlining the application and the removal of these items could expedite the application review. Some of the information gathered may be better reserved for the monitoring of the Title I, Part A grants.

Recommendations:

We recommend that BFEP develop tracking mechanisms that identify Areas of Focus and other programmatic requirements that require the highest frequency of edits and corrections. By quantifying the number of programmatic edits made by BFEP analysts, BFEP can identify problem areas and concentrate its training efforts with BFEP staff and school districts toward remedying particular areas of need. We additionally recommend BFEP compare the requirements in the applications to the requirements in the federal law and identify areas of duplication and non-required information in order to streamline the application review process.

Closing Comments

The Office of the Inspector General would like to recognize and acknowledge the Bureau of Federal Education Programs and the Office of Grants Management staff for their assistance during the course of this engagement. Our fieldwork was facilitated by the cooperation and assistance extended by all personnel involved.

To promote accountability, integrity, and efficiency in state government, the OIG completes audits and reviews of agency programs, activities, and functions. Our audit was conducted under the authority of section 20.055, F.S., and in accordance with the International Standards for the Professional Practice of Internal Auditing, published by the Institute of Internal Auditors, and Principles and Standards for Offices of Inspector General, published by the Association of Inspectors General. The consulting engagement was conducted by James Russell and supervised by Tiffany Hurst, CIA, and Audit Director.

Please address inquiries regarding this report to the OIG's Audit Director by telephone at 850-245-0403. Copies of final reports may be viewed and downloaded via the internet at <http://www.fl DOE.org/ig/auditreports.asp#F>. Copies may also be requested by telephone at 850-245-0403, by fax at 850-245-9419, and in person or by mail at the Department of Education, Office of the Inspector General, 325 West Gaines Street, Suite 1201, Tallahassee, FL 32399.