



**DEBRA K. DAVENPORT, CPA**  
AUDITOR GENERAL

**STATE OF ARIZONA**  
OFFICE OF THE  
**AUDITOR GENERAL**

**WILLIAM THOMSON**  
DEPUTY AUDITOR GENERAL

June 19, 2009

The Honorable Thayer Verschoor, Chair  
Joint Legislative Audit Committee

The Honorable Judy Burges, Vice Chair  
Joint Legislative Audit Committee

Dear Senator Verschoor and Representative Burges:

Our Office has recently completed a 12-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:

- 3 recommendations are in the process of being implemented; and
- 1 recommendation has not been implemented.

Our Office will continue to follow up at 6-month intervals on the status of those recommendations that have not yet been fully implemented.

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

### 12-Month Follow-Up Report

Recommendation	Status/Additional Explanation
----------------	-------------------------------

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

---

No Recommendations

---

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

---

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

##### **Implementation in process**

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 data submission problems including erroneous student SAIS identification numbers submitted by districts to the vendor and incomplete test results submitted by the vendor to ADE. To improve the data review process, ADE had planned to conduct formal reconciliation workshops in the spring of each year. At this time, ADE has scheduled trainings on data submission during June and August 2009. At the time of the 18-month follow-up, auditors will review the data at a sample of districts to verify the accuracy of data submitted by the vendor and the extent of district review of data.

---

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

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**

Effective in fiscal year 2010, ADE plans to add an integrity check within SAIS that will provide an error message when a student's ELL program participation is not supported by an appropriate AZELLA score. If implemented, this check could improve the accuracy of SAIS student detail data. However, improvements in the accuracy of student detail data may not result in accurate funding counts because SAIS has different systems for student detail and aggregate student counts. Specifically, some of the students whose data are flagged as erroneous in SAIS student detail are still included in SAIS aggregate counts. ADE still needs to improve the system for aggregate counts so that it uses only student detail data that has passed integrity.

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.

**Not implemented**

A critical process control related to student funding counts is not being implemented. According to ADE officials, because SAIS was designed to track Average Daily Membership, many of the integrity checks needed are outside the capability of the existing SAIS system. They assert that SAIS is unable to provide a list of students included in the funded ELL program counts—a key process control. ADE officials also report that they do not currently have the resources for a \$3 million project plan that is under development to rewrite SAIS to expand the capabilities. This Recommendation will remain "Not Implemented" until ADE proposes a viable plan for such capabilities and/or an alternative proposal to implement this process control. Another process control—district verification of submitted data using existing ADE reports—will be reviewed during 18-month follow-up after ADE, the vendor, and districts have resolved errors in the submission and download of AZELLA data.

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 the 32 statutorily-mandated monitoring visits to districts in fiscal year 2009, OELAS staff reviewed a sample of teacher files and class rosters for compliance with the ELL model's requirements for teacher qualification and class size. The collection of data on a sample basis may assist ADE with future efforts to collect information on a statewide basis. Statewide collection is not likely at the present time because of other more pressing challenges within the SAIS system and monitoring efforts.