



State of Arizona
Department of Education

Tom Horne
Superintendent of
Public Instruction

April 11, 2008

Ms. Debra K. Davenport, CPA
Auditor General
Office of the Auditor General
2910 North 44th Street, Suite 410
Phoenix, Arizona 85010

Dear Ms. Davenport:

The Arizona Department of Education is providing the enclosed response to the Auditor General's revised preliminary draft report entitled "Baseline Report of Arizona's English Language Learner Program."

We appreciate your work on this report and your consideration of our previous comments and suggestions.

Please feel free to call me at (602) 364-2339 if any additional information is needed.

Sincerely,

Margaret Garcia Dugan
Deputy Superintendent

Enclosure



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ADE General Comment

ADE welcomes recommendations that will lead to improved support for English Language Learners, better accountability in program design and implementation, and increased accuracy in data capture, management, and analysis.

Recognizing the limitations of the audit “Baseline Report of Arizona’s English Language Learner Program” in so far that it is based on a random sample methodology and only for the 2006-2007 Fiscal Year, ADE wishes to acknowledge the value of such an audit, and in particular the general reference information that was provided. Such review of other States’ and National data allows for a greater appreciation for the monumental steps taken by the State of Arizona and the Department of Education in recent years in addressing the needs of English Language Learners.

In additional, ADE wishes to further acknowledge that while the audit was limited to the 2006-2007 Fiscal Year, it was likewise limited in identifying major improvements and achievements during the current fiscal year (2007-2008) for those areas cited. As such, while ADE agrees to the four recommendations made by the Auditor General in this report, ADE will also identify such improvements and achievements, as well as future actions, in the response portions of this communication.

ADE Comments and Responses Regarding Recommendations

Recommendation 1

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

ADE Response

The recommendation of the Auditor General is agreed to and the audit recommendation will be implemented.

ADE has an established training component that employs the STAR Team to provide both general training as well as site specific assistance. ADE recognizes the difficulties faced by school districts and charters regarding turn-over in personnel and will continue to provide such assistance through the STAR Team in an on-going manner.

Since considerable data entry errors occur at the district and charter level, ADE is currently working with the assessment/testing company to arrange all AZELLA scores to be submitted directly to the SAIS System (electronic copies to the districts and charters) thus eliminating a vast number of local entry errors.

ADE has formed a Data Subcommittee that meets every four to six weeks. The Data Subcommittee is comprised of ADE staff (e.g. IT and R&E), and constituents from both the K-12 and Higher Education communities. The Data Subcommittee will incorporate dialog with a focus on accurate and timely data.

Recommendation 2

To ensure proper ELL program funding, ADE should add ELL integrity checks that require appropriate achievement data prior to including the student in funded participation counts.

ADE Response

The recommendation of the Auditor General is agreed to and the audit recommendation will be implemented.

ADE will examine and evaluate the integrity checks to assure that each student eligible for testing is tested and that English Language Learners classified as “proficient” are not counted for funding.

Recommendation 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.

ADE Response

The recommendation of the Auditor General is agreed to and the audit recommendation will be implemented.

To ensure the accuracy of the ELL management process, ADE will identify key performance metrics resulting in total system auditability.

Recommendation 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.

ADE Response

The recommendation of the Auditor general is agreed to and the audit recommendation will be implemented.

For the past several months ADE has been working with software developers to design an interactive software and technology piece for the field monitoring and data collection process. The software and technology will allow field agents to collect such data as matching model selection to actual model implementation, the number of hours provided for by program design and actual program participation of individual students, teacher qualifications, and other data traditionally collected in monitoring by paper and pencil. The ability to transmit the collected data electronically to the Agency from the field is a feature that is incorporated into the technology to better insure more timely and accurate information regarding the ELL programs.

ADE will implement the software and technology in the monitoring and data collection process.