Texas
Targeted Monitoring Review of
School Improvement Grants (SIG) under section 1003(g) of the
Elementary and Secondary Education Act of 1965
January 30 – February 3, 2012

BACKGROUND

Overview of SIG Schools in TEXAS FY 2009

Tier	Number of FY 2009 Eligible SIG Schools	Number of FY 2009 Served SIG Schools
Tier I	69	30
Tier II	113	18
Tier III	1462	18

Implementation of SIG School Intervention Models

Models	Number of Schools Implementing the Model
Turnaround	2
Transformation	64
Restart	0
Closure	0

Overview of SIG Schools in TEXAS FY 2010

Tier	Number of FY 2010 Eligible SIG Schools	Number of FY 2010 Served SIG Schools
Tier I	28	11
Tier II	234	43
Tier III	168	14

Implementation of SIG School Intervention Models

Models	Number of Schools Implementing the Model
Turnaround	1
Transformation	67
Restart	0
Closure	0

MONITORING TRIP INFORMATION

Monitoring Visits	
LEA Visited	*Houston Independent School District*
School Visited	*Kashmere High School*
Model Implemented	*Transformation*
FY 2009 Funding Awarded (over three years)	*LEA Award (for 6 SIG schools): $28,005,054* *Kashmere High School funding: $5,200,108*
FY 2010 Funding Awarded (for one year)	*LEA Award (for 1 SIG school) $1,750,000* *Patrick Henry Middle School*
LEA Visited	*Austin Independent School District*
School Visited	*Lanier High School*
Model Implemented	*Transformation*
FY 2009 Funding Awarded (over three years)	*LEA Award (for 2 SIG schools): $10,700,000*
FY 2010 Funding Awarded (over three years)	*LEA Award (for 3 SIG schools): $12,716,657* *Lanier High School funding $5,992,251*
SEA Visited	*Texas Education Agency*
FY 2009 SIG Award	*$52,030,307 – ARRA $285,896,287*
FY 2010 SIG Award	*$51,428,374*

Staff Interviewed

- *SEA Staff: 4* Grants Administration staff; 2 Federal and State Educational Policy staff; 2 staff from School Improvement Resource Center (SIRC); 4 School Improvement and Support staff.
- *HISD Staff :* 5 district staff
- *KHS Staff: Principal, 8 School Leadership Team staff, 6 Teachers, 8 Parents, Students, and 3 Classroom Visits*
- *AISD Staff:* 4 district staff
- *LHS Staff: Principal, 7 School Leadership Team staff, 5 Teachers, 9 Parents, Students, and 3 Classroom Visits*

U.S. Department of Education Staff

Team Leader	Carlas McCauley
Staff Onsite	Michael Wells and Christopher Tate

<u>**OVERVIEW OF MONITORING REPORT**</u>

The following report is based on the U.S. Department of Education's (ED) on-site monitoring visit to Texas from January 30, 2012, to February 3, 2012 and review of documentation provided by the State Educational Agency (SEA), Local Educational Agencies (LEAs), and schools. The report consists of three sections: *Summary and Observations, Technical Assistance Recommendations,* and *Monitoring Findings.* The *Summary and Observations* section describes the implementation of the SIG program by the SEA, LEAs, and schools visited, initial indicators of success, and outstanding challenges being faced in implementation. This section focuses on how the SEA, LEAs, and schools visited are implementing the SIG program with respect to the following five areas: school climate, teachers and leaders, instructional strategies and time, use of data, and technical assistance. The *Technical Assistance Recommendations* section identifies strategies and resources for addressing technical assistance needs. The *Monitoring Findings* section identifies areas where the SEA is not in compliance with the final requirements of the SIG program and indicates required actions that the SEA must take to resolve the findings.

Please Note: The observations and descriptions included in this report reflect the specific context of the limited number of classrooms visited and interviews conducted at a small number of schools and LEAs within the State. As such, they are a snapshot of what was occurring at the LEA and school levels, and are not meant to represent a school's, LEA's, or State's entire SIG program. Nor are we approving or endorsing any particular practices or approaches by citing them.

<u>**SUMMARY AND OBSERVATIONS**</u>

<u>*School Climate*</u>

<u>Houston Independent School District - Kashmere High School</u>

The Kashmere High School (KHS) leadership team, students, teachers, and parents all agreed that the changes to improve school climate created a sense of order, especially as compared to the earlier environment. During a classroom discussion with students, it was noted that the dress and behavior codes are now consistently applied and staff seem to genuinely care about student success and advancement. The hallways and classrooms were covered with displays showcasing student work and successes intermingled with posted goals, plans, and examples of the use of data to drive next steps in instruction and upcoming learning activities in the classroom.

The school improved school climate, in part, by creating a mentorship program between staff and students. All KHS staff are assigned a small number of students for whom they act as mentors. Mentors and students meet regularly to discuss issues related to school performance, career and college decisions, behavior concerns, and personal matters students may be facing. In addition, social workers are assigned to the KHS campus to facilitate connections to community agencies for those students or families that need assistance or support outside of school.

KHS/HISD has taken several steps to implement a comprehensive and inclusive parent engagement strategy. Teachers keep a contact log detailing how often and which

parents/guardians are contacted. Parents reported that conversations between themselves and teachers are now more about student instruction and learning, as compared to previous years when conversations were fewer but almost always about discipline or attendance issues. Parents also reported being pleased that they can access student grades and attendance information on-line and that they appreciated the personal access they now have, unlike in previous years, to the principal and administration. Moreover, parents noted the significant increase in activities designed to inform, engage, and support parents, including opportunities for parents to gain further education.

Austin Independent School District - Lanier High School

Following its SIG application, Lanier High School (LHS) addressed school climate challenges through various efforts. Students stated benefiting from the additional attention from teachers, such as new math tutoring and extra help during lunch, teacher planning time, and after school hours. A Dropout Prevention Specialist has also been added to the staff to provide case management and direct intervention services for students with difficulties regarding attendance, behavior, or other barriers to successful school performance and learning.

Students agreed that the school climate was better this year than it was in previous years, explaining that teachers were more helpful and supportive and that the school was more orderly and safe. One student explained that his older sister and her friends as well as his parents had heard bad stories about the school and told him not to enroll. He said that he and his parents are now glad that he did.   Teachers noted conversations with each other, as well as teacher leaders, had changed from whether teachers were meeting the requirement to whether students were learning successfully and how to improve teaching and learning.

LHS continues to work on ways to improve parent and community engagement and acknowledges that it needs to take additional steps. While parents stated that they liked the improved orderly nature of the campus and level of teacher involvement, they explained that they wanted to be more informed about their students' academic progress. Parents believed the new system allowing grades to be viewed online was helpful, but stated grades were not always regularly updated. Parents also observed that the school is now actively addressing student attendance. Parents indicated they were generally unaware of the school's SIG efforts and hoped for more communication with teachers and the administration about schoolwide activities and events.

Teachers and Leaders

Houston Independent School District - Kashmere High School

The principal at Kashmere High School (KHS), the seventh in eight years, was hired in July 2010 as a part of the pre-implementation process. Changes were also made in the assignment of duties to assistant principals: they are assigned to one grade level and work closely with staff within that grade level, as well as supporting all schoolwide activities.

As a part of the transformation process, KHS replaced approximately 50% of the staff and selected new staff by recruiting teachers through Teach for America (TFA) and providing sign-on incentives for new teachers. A management team reviewed evaluations and the available achievement data prior to conducting interviews to determine which staff would be offered the opportunity to reapply for their position. HISD explained during the LEA interview that they were committed to making hard choices, even if those choices included termination or buying out contracts, to ensure that their low-performing schools had high quality teachers. The school also continues to provide incentives, as a part of their recruitment process, to teachers from across the district who have demonstrated significant student gains in other low-performing schools.

Teachers said that targeted professional development opportunities are offered across the district to teachers based on student achievement and leadership observations. Teachers are placed on individual professional development plans aimed at measuring their professional growth and developing their capacities within the classroom. District staff also indicated that there are professional development activities specifically designed to address overall school improvement and that staff from SIG schools are encouraged to attend. Teachers indicated a desire for a better process for sharing with other staff any best practices, skills, techniques, or information gained at professional development activities.

TEA requested and received approval from the Department in January 2012 to waive the timeline for implementing the teacher and principal evaluation requirement for cohorts 1 and 2. TEA must ensure that LEAs pilot the evaluation system during the 2012-2013 school year by providing technical assistance and monitoring the development of the evaluation system. Full implementation by LEAs is then to occur for the 2013-2014 school year.

Austin Independent School District - Lanier High School

The principal at Lanier High School has been serving as principal since the 2009-2010 school year. The district's SIG application indicated that it decided to retain the principal and provide her with leadership coaching and training.

The district required LHS to reduce the staff during the 2010-2011 school year by 24 positions through a performance evaluation review process. For the 2011-2012 school year, the school hired 42 teachers for available positions. 39 of the newly hired teachers were novice teachers. The district also has approved two new teaching positions for the next school year.

Changes in Staff

Austin Independent School District

The district leadership at AISD reported that the LEA recruits staff, with an emphasis on bilingual teachers, through the University of Texas, TFA, AmeriCorp, and iTeachTX (a private alternative teacher certification program). While teachers often recommend new staff to the administration, there is no specific recruitment strategy in place for LHS at this time.

A teacher evaluation process is in place but teachers report not being entirely aware of the process. Observations, student growth data, and professional development are used in determining necessary instructional interventions and incentives are in place for teachers who have demonstrated gains over the year. Master Teachers are assigned to teachers who have demonstrated instructional support needs. Because the school has a high English Secondary Language (ESL) student population, all new teachers must participate in a three-day summer program, Quality Teaching for English Learners, focused on best practices in working with ESL students. Teachers, however, report the need for increased district support in reaching their student learning objectives through targeted professional development opportunities on instructional practices.

Instructional Strategies and Time

Houston Independent School District - Kashmere High School

KHS has introduced several new interventions to improve content and support struggling students. For example, KHS implemented additional core coursework in reading and math for all ninth-grade students. Tenth- and eleventh-grade students who do not meet proficiency on assessments are also required to receive double the core instruction in reading and/or math. KHS leadership reported that they have implemented a number of opportunities for students to recover credits or receive additional instruction through evening courses and a Saturday/Sunday program.

KHS has increased the school day for students, based on the bell schedules provided, from a student day of 8:30 am to 3:55 pm (with a 35 minute lunch) in the 2009-2010 school year to one of 7:40 am to 4:30 pm Monday through Thursday (with a 35 minute lunch and ending at 3:30 pm on Friday) in the 2011-2012 school year. The teacher day has been extended by an extra 15 minutes per day with the 15 minutes extra, from 4:30 to 4:45 pm Monday through Thursday, being pooled for an extra hour of Professional Development on Wednesdays.

Austin Independent School - Lanier High School

LHS made several instructional changes to support students who are facing challenges in the classroom. For example, it implemented the Twilight Program for credit recovery and weekend classes for students in need of additional core content instruction. In December of 2011, LHS began an in-school tutoring program, administered by an external provider, through which students are enrolled in a double block for math and spend half the time working with a tutor to support what they are learning in the classroom. These services are aligned with classroom instruction to offer a scaffolded approach to supporting student needs. This alignment is facilitated by regular collaborative meetings between the tutors and the classroom teacher of the tutors' students.

Staff at LHS, as well as AISD, reported that they were not able to extend the school day, or otherwise increase learning time, due to strong opposition from parents in the community.

Use of Data

Houston Independent School District - Kashmere High School

HISD uses Campus Online to collect and monitor data on individual campuses across the district. Student and teacher attendance, discipline data, teacher evaluation data and value-added data are used at the district level to help direct resources throughout the district. The HISD staff further indicated that the School Leadership Appraisal System will be implemented during the 2012-2013 school year. This system will allow the district to evaluate leadership teams and be strategic in placing their strongest leaders in their highest-need schools.

HISD/KHS recognized in its SIG application that KHS's turnaround effort depended on using data-driven instruction and made several changes to improve the use of data. The school presently collects discipline and attendance data for the purpose of targeting specific interventions and incentives to students who receive referrals regularly or have frequent absences. KHS staff also use data on a daily basis to inform instruction: teachers reported that they examine student achievement data using a system that analyzes test results. In the long-term, the principal indicated that the school will profile student achievement in the new data room, so that teachers and leadership have a students' complete academic profile in one location.

Austin Independent School District - Lanier High School

AISD explained that it is committed to using data, including by comparing student achievement data across campuses to help determine coaching meetings with individual teachers or groups of teachers. The district is developing a process for identifying value-added data by teacher and by student across the district; AISD staff indicated that this process is on track even though state funding has been delayed.

School leaders are also encouraging teachers at LHS to increase the use of data to inform instruction. For example, the school has made available professional development opportunities to help teachers understand and analyze student data. Because this practice is relatively new to the school, the teachers explained that they are unsure how they will incorporate data over the long term but expect that further professional development will address this more effectively. Finally, LHS has hired a Dropout Prevention Specialist to collect and analyze discipline and attendance data to identify targeted interventions for at-risk students.

Technical Assistance

Texas Education Agency

TEA requires that each LEA hire a School Improvement Officer (also known as a District Shepherd) to manage the implementation of SIG at the district level. This person provides technical assistance and support, as appropriate, based upon their on-going assessment of each school's needs or requests.

During interviews with TEA, staff noted that as a part of the Cohort 1 application process it met with stakeholders and district administration on several occasions to discuss requirements and

provide instructions for completion of SIG applications. Further TEA provided guidance during the Cohort 2 application process to stakeholders through their Committee of Practitioners, and offered optional webinars on the LEA application process.

To support of LEA implementation TEA designated the School Improvement Resource Center (SIRC) housed at the Region XIII Education Service Center (ESC) as the provider of technical assistance and support to districts and SIG schools. For LEAs selecting the TEA-designed model for school turnaround, SIRC automatically provides technical assistance throughout the implementation process to ensure fidelity. LEAs choosing to implement a self-designed model (ensuring that the model meets federal requirements) have the option of requesting to be included in any and all technical assistance activities offered by SIRC. In addition to webinars, SIRC staff provide feedback and technical assistance through site visits, monitoring reports and follow-up, via Professional Service Provider (PSP) assigned to SIG campuses, case-management for individual campus needs, trainings on transforming classroom practice, and periodic conferences around topics of school turnaround and improvement. These conferences also include targeted technical assistance specific to the individual intervention models. Other ESCs are also available to provide technical assistance for those SIG schools in their regions.

The TEA also undertakes some support efforts itself. For example, it has provided LEAs with resources on possible external providers and the use of the RFP process in recruiting/selecting potential providers for those LEAs that seek it. TEA also collects data on all leading SIG indicators and for twenty-one various other critical success factors through quarterly reports, monthly calls with District Shepherds, and quarterly site-visits. TEA reports that they are planning to use this data in the development of a plan for providing targeted technical assistance to LEAs. HISD staff reported receiving helpful technical assistance from TEA regarding relevant central office administrative structure and in increasing the capacity of support personnel needed to implement SIG in the district's awarded schools.

School staff, as well as district level staff in both districts, stated they would like to have the opportunity to consult with other SIG districts about lessons learned and best practices. While some opportunities for collaboration and peer-to-peer sharing have occurred at statewide conferences and meetings, school staff expressed interest for more, perhaps one-to-one, consultation between two districts with similar needs or issues. HISD and AISD staff also identified a need for additional help in identifying strategies for and developing plans for sustainability for SIG-funded schools.

Houston Independent School District

The superintendent of Houston Independent Schools District has been in his position since September of 2009. Shortly after taking the position, he began a district-wide effort to turn around all low-performing schools in HISD and established the Apollo schools initiative as a part of that effort. In addition, according to the Chief Officer of the Major Projects Department, she and her department were tasked with oversight and support of the district-wide effort to reconstitute HISD's lowest performing schools.

HISD has provided support to their SIG campuses, according to the leadership team at Kashmere High School and district staff, in the areas of budget preparation for SIG funds, necessary

documentation procedures, data reporting, and compliance and reporting requirements. Still HISD identified several areas for further technical assistance: (a) building capacity on campuses for teacher training/supports and provision of professional development; (b) continued budget automation and development support for campuses; (c) implementation of the newly implemented ASPIRE system which includes hiring processes and performance appraisal; and (d) the use of technology to free teachers and leaders to do more face-to-face work with each other and with students and parents.

Austin Independent School District

The school district has reorganized since the beginning of the SIG application process began. The District Shepherd, a person whose role it is to guide schools through the reform process for the district, was moved to the State and Federal Accountability Office. This move, according to AISD staff, has eased the processes needed to support implementation of the SIG projects in the district. The District Shepherd noted that the focus of the district since the reorganization has changed from entirely evaluative of the program to a much more supportive role in building the capacity of the schools to fully implement SIG.

AISD chose to implement the TEA design transformation model and, therefore, the district receives specific technical assistance from SIRC. Through this arrangement, the district and SIG schools work with Professional Service Providers who support delivery of technical assistance directly. AISD schools also have access to program specialist on-line from SIRC. AISD staff indicated that the district offers specific targeted professional development activities on school improvement topics and, as part of the effort, all SIG staff from all campuses attend. AISD staff, primarily the District Shepherd, have provided assistance with basic grant management activities, such as reporting and the resolution of compliance issues, and program implementation.

AISD has also provided specific accounting and budget support to SIG schools, and gives priority to purchase orders for needed SIG materials or supplies.

TECHNICAL ASSISTANCE RECOMMENDATIONS

Issue 1: Based on TEA guidelines, both LEAs visited indicated that during the application process they believed they could only request funding amounts based on school enrollment. TEA instructions and webinars stated that the funding ranges were guidelines; LEAs interpreted these ranges as requirements and decided not to request amounts that they believed were necessary for full and effective implementation.

Technical Assistance Strategies:

- Revise instructions for FY 2011 LEA applications and any technical assistance materials, including webinars, to indicate that LEAs may apply for up to two million dollars per school with appropriate justification for the funding requested being provided. (Responsibility: TEA).
- Budgets for LEA applications that are approved for funding should be reviewed and adjusted to allow for the amount of funding needed (up to the maximum of two million dollars per school) for full and effective implementation of the LEA's approved plan for SIG implementation. (Responsibility: TEA).

Issue 2: HISD and AISD staff expressed an interest in more opportunities to share best practices and lessons-learned among districts with SIG schools. They identified several areas of need: targeted professional development specific to SIG teachers and leaders; hiring processes and performance appraisal; and management flexibility practices that allow for turnaround school leadership to invest time in the cultural change.

Technical Assistance Strategies:

- Use state monitoring findings and recommendations to develop a strategic plan for targeted interventions and professional development opportunities specific to a districts' needs. (Responsibility: TEA).
- Establish a cross-district leadership collaborative facilitated by District Shepherds or others for sharing lessons learned from SIG implementation. (Responsibility: TEA).

Issue 3: Both LEAs asked for support in identifying strategies for sustaining reform efforts in SIG schools.

Technical Assistance Strategies:

- Provide resources to TEA and SIRC that support sustainability planning and continued implementation of SIG-funded interventions. (Responsibility: ED)
- Develop strategies to assist LEAs in identifying strategies for sustaining reform efforts in SIG schools. (Responsibility: TEA)

Issues 4: AISD and HISD sought assistance in building community support for their turnaround efforts: LHS encountered some community opposition to increasing the length of the school day, and KHS found it challenging to tell their "turnaround" story.

Technical Assistance Strategies:
- Provide best practices and lessons-learned from districts where districts successfully established community partnership and developed support for their turnaround efforts. (Responsibility: ED)
- Work with LEAs to develop strategies for developing community partnerships and developing support for the districts' school turnaround efforts. (Responsibility: TEA)

Issues 5: Interviews with LHS parents revealed that parents have not been fully informed about school events or changes that are occurring as part of the school turnaround effort.

Technical Assistance Strategies
- Provide resources to TEA on effective strategies for engaging parents in the school community and reform efforts.(Responsibility: ED)
- Develop a family and community engagement plan or set of strategies that will help Lanier High School and other schools improve parent and community outreach and increase parent engagement in the implementation of turnaround efforts. (Responsibility: AISD and TEA)

MONITORING FINDINGS

Summary of Monitoring Indicators

Critical Element	Requirement	Status	Page
1. Application Process	The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)]	NA	
2. Implementation	The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	13
3. Fiscal	The SEA ensures LEAs and schools are using funds consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)) ; §1114 of the ESEA; and Office of Management and Budget (OMB) Circular A-87]	Finding	13
4. Technical Assistance	The SEA ensures that technical assistance is provided to its LEAs consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	NA	
5. Monitoring	The SEA ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	NA	
6. Data Collection	The SEA ensures that data are being collected consistent with the final requirements of the SIG program. [Sections II and III of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	NA	

Monitoring Area: School Improvement Grants Program

Critical Element 2: The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program.

<u>Finding:</u> TEA did not ensure that AISD established schedules and implemented strategies that increase learning time for all students. Although the LHS provided additional time within the school day for teaching and tutoring in math instruction for ninth-grade students, and for those in other grades that are experiencing difficulty in math, these changes did not increase learning time for all students. Further, it has not provided additional time for enrichment activities or additional time for teachers to collaborate, plan, or engage in professional development activities. Staff at Lanier High School, as well as staff at AISD's central office, indicated that they were not able to increase the learning time for all students due to strong objections from the community.

<u>Citation</u>: Section I.A.2 (d) (3) (A) of the final requirements stipulates, as part of the transformation model, that an LEA must "establish schedules and implement strategies that provide increased learning time." Section I.A.3 of the final requirements defines increased learning time as "using a longer school day, week, or year schedule to significantly increase the total number of school hours to include additional time for: (a) instruction in core academic subjects including English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography; (b) instruction in other subjects and enrichment activities that contribute to a well-rounded education, including, for example, physical education, service learning, and experiential and work-based learning opportunities that are provided by partnering, as appropriate, with other organizations; and (c) teachers to collaborate, plan, and engage in professional development within and across grades and subjects" (75 FR 66363 (October 28, 2010)).

<u>Further action required</u>: TEA must work with AISD to ensure that all schools implementing the transformation model have significantly increased the number of school hours and that the additional time is being consistently used for instructional purposes for all students.

Additionally, TEA must submit evidence to ED that it has reviewed each LEA that received FY 2009 and FY 2010 SIG funds to implement the transformation or turnaround model to determine if increased learning time is being implemented consistent with the SIG final requirements. For each school implementing the turnaround or transformation model, TEA must submit to ED documentation demonstrating the increase in learning time under the school intervention model and evidence that the time is being increased in accordance with the definition of "increased learning time" in the final requirements and Guidance on School Improvement Grants (March 1, 2012).

Critical Element 3: The SEA ensures LEAs and schools are using funds consistent with the final requirements of the SIG program.

Finding: The TEA has not ensured that SIG funds were awarded and allocated to LEAs in a timely manner to support the full and effective implementation of the each school's SIG plan. Although LEAs received notification in August 2011 that their SIG applications were approved, at the time of ED's monitoring visit TEA had not allocated SIG funds to all schools or all of the LEAs. Lanier High School, for example, received its allocation two weeks before the monitoring visit on January 17, 2012. The other two schools in AISD had yet to receive their funds when the monitoring visit occurred. TEA reported that they were aware of the delays and that staff reductions and reorganization had resulted in a decrease of the staff able to complete the process needed for SIG funds allocation to LEAs. At the time of ED's monitoring visit, TEA had allocated SIG funds to 44 of the 62 schools with approved SIG applications; 13 other schools were awaiting final signatures from the Discretionary Grants Office and 4 continued negotiations with the TEA SIG team. Because of the delay, LEAs and schools were using other funds to carry out approved SIG activities or delayed SIG implementation pending receipt of their SIG allocation. In the case of LHS, the district had allowed for the hiring of some staff with the expectation of the costs being reimbursed to the district once SIG funds were available.

Citation: Section 80.40(a) of EDGAR requires that grantees are responsible for managing the day-to-day operations of grant and sub-grant supported activities.

Further action required: TEA must provide funding to its LEAs in a timely manner after an LEA's SIG plan is approved. TEA must submit to ED evidence that its LEAs have received their 2010-2011 SIG allocations. Further, TEA must develop procedures for allocating funding to LEAs in a timely fashion and submit those procedures to ED. Along with the identified procedures, TEA must provide documentation that the State's revised process will ensure timely funding of its LEAs/schools for the 2012-2013 school year and comply with any conditions included by ED regarding the award of the FY 2011 SIG funds.