



Arizona Department of Education
MEGA Conference Title I Allocations Overview

November 15, 2017

In this session, we will dive more deeply into Title I Allocations to answer the following questions:

- **How do Title I allocations work?** *Discuss the Title I allocations process step-by-step*
- **What went wrong?** *Discuss the errors identified in the audit and review process, including examples*
- **How is this being fixed?** *Demonstrate how these errors have been or are being resolved*
- **What is our plan to move forward?** *Share the USED communications with you*

Afton Partners: Who We Are

6

Years

95+

Initiatives

32

States

7,500+

Schools

Afton's vision is that all of America's public education organizations are using ***financial strategies, policies, and practices that sustain effective academic initiatives***—allowing more students to succeed.

Three areas of work:

Sustainability Planning

Operational Efficiency & Effectiveness

Funding Equity & Fiscal Transparency

How do Title I Allocations work?

Why do we have a “Title I Allocations” Process?

SEAs receive allocations from USED and are required to further allocate funds equitably to LEAs based on established criteria

While allocations come from USED by LEA, it is only by census-district (county) LEA; this must be further disaggregated for non-census LEAs

Title I LEA Allocations Process Overview

USED sends Title I funding under four Title I grant components (Basic, Concentration, Targeted, and Education Finance Incentive Grants) to SEAs for census-districts only

SEAs must adjust allocations to accommodate non-census-LEAs

SEAs must ensure no LEA is seeing an unmanageable year-over-year reduction in funding (this is known as the “hold harmless” provision)

SEAs must “set aside” funding for School Improvement and Administration activities

SEAs must apply adjustments for “maintenance of effort” issues and any applicable prior year adjustments

USED sends Title I funding under four Title I grant components to SEAs for census-districts only

A	B	C	D	E	F	G	H	I
							PERCENTAGE	
		2016-17	2016-17	2016-17	2016-17	TOTAL	OF TOTAL	
LEAD	LOCAL EDUCATIONAL AGENCY (LEA)	BASIC ALLOCATION	CONC. ALLOCATION	TARGETED ALLOCATION	EFIG ALLOCATION	2016-17 TITLE I ALLOCATION	2015-16 TITLE I ALLOCATION	RESIDENT POP.
400450	Agua Fria Union High School District	\$542,405	\$110,917	\$196,235	\$152,235	\$1,001,791	100.96%	129,268 *
400480	Aguila Elementary District	\$45,530	\$11,105	\$27,872	\$26,886	\$111,393	112.18%	1,262
400520	Ajo Unified District	\$92,632	\$22,592	\$47,814	\$49,419	\$212,457	95.00%	3,386
400600	Alhambra Elementary District	\$3,817,641	\$909,397	\$2,864,721	\$2,922,052	\$10,513,811	117.99%	90,463 *
400630	Alpine Elementary District	\$7,057	\$1,672	\$3,512	\$2,775	\$15,015	90.00%	465
404770	Altar Valley Elementary District	\$237,199	\$57,852	\$114,161	\$111,170	\$520,382	90.00%	7,455
400680	Amphitheater Unified District	\$2,028,698	\$483,254	\$1,013,786	\$842,606	\$4,368,345	104.01%	139,577 *
400720	Antelope Union High School District	\$44,925	\$10,701	\$19,614	\$15,502	\$90,742	101.80%	6,613
400750	Apache Elementary District	\$0	\$0	\$0	\$0	\$0	0.00%	161
400790	Apache Junction Unified District	\$1,013,876	\$241,515	\$459,931	\$369,282	\$2,084,604	105.41%	60,880 *
400840	Arlington Elementary District	\$68,084	\$16,579	\$43,547	\$48,510	\$176,720	95.00%	1,593
400870	Ash Creek Elementary District	\$14,785	\$3,576	\$10,338	\$11,394	\$40,093	95.00%	683

ADE receives a data file (screenshot above) from US ED that includes the State's total Title I Part A allocation, broken out by sub-grant component, with initial allocations to Census LEAs only, based on latest available Census population and poverty data.

SEAs must adjust allocations to accommodate non-census-LEAs

Anonymized Name	Census and SAIS Enrollment and Poverty Metrics for Adjusted Counts								US ED \$ Allocations (Census Only)					Intra-County Reallocation from Census to Non-Census				
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
	Census Population	Census Poverty	PY SAIS Oct Enrollment Counts	PY SEA Census Poverty Counts	Poverty Adjustment	Adjusted Population	Adjusted Poverty	Adjusted Percentage	"original to census LEAs from Fed"					"reallocated" BEFORE HH				
									2017 Basic	2017 Concentration	2017 Target	2017 EFIG	2017 Title I Allocations	2017 Basic	2017 Concentration	2017 Target	2017 EFIG	2017 Title I Allocations
Census LEA 499	110	23	103	92	(1.8)	102	21	20.69%	\$34,502	\$8,761	\$22,670	\$24,972	\$90,904	\$31,803	\$8,075	\$20,896	\$23,019	\$83,793
Census LEA 500	174	55	166	143	(4.3)	162	51	31.32%	\$36,406	\$9,244	\$16,307	\$14,858	\$76,815	\$33,558	\$8,521	\$15,031	\$13,695	\$70,806
Census LEA 501	353	106	230	198	(8.3)	328	98	29.76%	\$51,836	\$13,162	\$23,579	\$21,198	\$109,775	\$47,781	\$12,132	\$21,734	\$19,539	\$101,186
Census LEA 502	354	95	147	125	(7.4)	329	88	26.60%	\$44,925	\$10,701	\$19,614	\$15,502	\$90,742	\$41,410	\$9,864	\$18,079	\$14,290	\$83,643
Census LEA 503	3,203	1,149	2907	2508	(90.3)	2,978	1,059	35.55%	\$543,351	\$129,431	\$300,321	\$297,499	\$1,270,602	\$500,843	\$119,305	\$276,826	\$274,225	\$1,171,199
Census LEA 504	4,355	1,774	5491	5104	(139.4)	4,049	1,635	40.37%	\$838,907	\$199,835	\$518,180	\$524,442	\$2,081,364	\$773,277	\$184,202	\$477,641	\$483,413	\$1,918,532
Census LEA 505	6,588	1,936	6526	4383	(152.1)	6,125	1,784	29.12%	\$915,515	\$218,084	\$424,972	\$344,315	\$1,902,886	\$843,891	\$201,023	\$391,725	\$317,378	\$1,754,017
Census LEA 506	10,809	2,474	8580	6154	(194.4)	10,050	2,280	22.68%	\$1,361,733	\$345,764	\$644,738	\$606,501	\$2,958,736	\$1,255,200	\$318,714	\$594,298	\$559,052	\$2,727,264
Census LEA 507	11,974	3,858	7778	5428	(299.2)	11,133	3,559	31.97%	\$1,824,410	\$434,591	\$919,840	\$779,444	\$3,958,285	\$1,681,680	\$400,592	\$847,878	\$718,465	\$3,648,615
Non-Census LEA 508			129	53		129	23	18.00%						\$11,440	\$2,772	\$5,850	\$5,321	\$25,383
Non-Census LEA 509			73	65		73	28	39.01%						\$14,030	\$3,400	\$7,175	\$6,526	\$31,131
Non-Census LEA 510			1678	1513		1,678	663	39.50%						\$326,575	\$79,140	\$167,010	\$151,900	\$724,626
Non-Census LEA 511			713	381		713	167	23.41%						\$82,237	\$19,929	\$42,056	\$38,251	\$182,474
Non-Census LEA 512			70	36		70	16	22.92%						\$7,859	\$1,905	\$4,019	\$3,656	\$17,439
Charter Subtotal						2,663	897											
Subtotal	37,920	11,470	34,591	26,183		37,920	11,470		\$5,651,584	\$1,369,574	\$2,890,220	\$2,628,730	\$12,540,109	\$5,651,584	\$1,369,574	\$2,890,220	\$2,628,730	\$12,540,109



ADE uses a combination of Census Data (from two years prior for Census LEAs only) & SAIS Enrollment and FRL Data (from October of prior year for ALL LEAs) to create "Adjusted" student counts

ADE uses these adjusted student counts to proportionately reallocate US ED Title I Allocations from Census LEAs to Non-Census LEAs within the same county. This step must also consider LEA sub-grant eligibility by LEA. Note that the totals for each sub grant for the county remain the same before and after the reallocation.

SEAs must then ensure no LEA is seeing an unmanageable year-over-year reduction in funding (the "hold harmless" provision)

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Example of “BASIC” grant hold harmless calculation

Anonomized Name	A	B	C	D	E	F	G	H	I	J	K	L
	Prior Year "Reallocated" Amount before HH	HH Rate	Hold Harmless Amount	Current Year "Reallocated" Amount before HH	Hold Harmless Funds Required	Allocations of LEAs Above Hold-Harmless	Adjustment to Allocations to LEAs Above Hold-Harmless	Adjusted Allocations	Further Adjustments Required 4	Allocations of LEAs Above Hold-Harmless	Adjustment to Allocations to LEAs Above Hold-Harmless	Adjusted Allocations - FINAL AFTER HH
Census LEA 375	\$0	85%	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Census LEA 363	\$47,851	85%	\$40,674	\$40,627	\$46	\$0	\$0	\$40,674	\$0	\$0	\$0	\$40,674
Census LEA 376	\$0	95%	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Census LEA 364	\$233,586	90%	\$210,227	\$209,987	\$240	\$0	\$0	\$210,227	\$0	\$0	\$0	\$210,227
Non-Census LEA 412	\$10,605	95%	\$10,075	\$16,596	\$0	\$16,596	(\$206)	\$16,390	\$0	\$16,369	\$0	\$16,369
Non-Census LEA 388	\$74,595	95%	\$70,866	\$71,125	\$0	\$71,125	(\$882)	\$70,243	\$0	\$0	\$0	\$70,866
Non-Census LEA 409	\$52,811	95%	\$50,170	\$50,577	\$0	\$50,577	(\$627)	\$49,951	\$0	\$0	\$0	\$50,170
Non-Census LEA 410	\$15,489	90%	\$13,940	\$29,767	\$0	\$29,767	(\$369)	\$29,398	\$0	\$29,361	\$0	\$29,361
Non-Census LEA 386	\$13,575	95%	\$12,896	\$10,800	\$2,096	\$0	\$0	\$12,896	\$0	\$0	\$0	\$12,896
Non-Census LEA 390	\$26,104	95%	\$24,799	\$20,547	\$4,252	\$0	\$0	\$24,799	\$0	\$0	\$0	\$24,799
Non-Census LEA 406	\$41,786	95%	\$39,697	\$21,074	\$18,623	\$0	\$0	\$39,697	\$0	\$0	\$0	\$39,697

Using each LEA’s “Hold Harmless Rate” of 85%, 90%, or 95% (determined by poverty and enrollment counts) and the prior year sub-grant allocation before set-asides, the minimum funding for each LEA amount is determined.

LEAs falling below their minimum requirement will be brought up to their minimum funding level. This is “funded” by taking proportionately from other LEAs being allocated an amount above their minimum funding level.

This process must be iterated upon until ALL LEAs in the State are funded at or above their minimum funding level.

SEAs must then “set aside” funding for School Improvement and Administration activities

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	A	B	C	D	E	F
	School Improvement & Admin Set Aside				New/Exp Charter Set-Aside	
Anonimized Name	Sec 1003 School Improvement Set Aside	2017 Allocations after SI Set Aside	Admin Set-Aside	2017 Allocation After ADMIN Set-aside	New/Exp Charter Set-Aside	2017 Allocation After New/Exp Charter Set-Aside
Census LEA 504	\$38,200	\$1,870,065	\$17,898	\$1,852,167	\$18,522	\$1,833,645
Census LEA 505	\$96,837	\$1,631,988	\$15,619	\$1,616,369	\$16,164	\$1,600,206
Census LEA 506	\$0	\$2,787,578	\$26,679	\$2,760,899	\$27,609	\$2,733,290
Census LEA 507	\$201,471	\$3,395,384	\$32,496	\$3,362,888	\$33,629	\$3,329,259
Non-Census LEA 508	\$0	\$48,065	\$460	\$47,605	\$476	\$47,129
Non-Census LEA 509	\$1,719	\$28,971	\$277	\$28,694	\$287	\$28,407
Non-Census LEA 510	\$40,014	\$674,358	\$6,454	\$667,904	\$6,679	\$661,225
Non-Census LEA 511	\$10,076	\$169,815	\$1,625	\$168,190	\$1,682	\$166,508
Charter Subtotal						
Subtotal	\$388,940	\$12,111,427	\$115,915	\$11,995,512	\$119,955	\$11,875,557

School Improvement Set Aside:
States must “set aside” a mandated % of the total US ED allocation for the School Improvement Fund. For FY14-17, this amount is 4% and only those LEAs experiencing an increase in funding YOY can contribute funds to meet this required total.

Admin Set-Aside:
Annually, US ED determines the amount that each state can set aside to fund administrative costs associated with the grant. ALL LEAs contribute proportionally to this set aside.

New and Expanding Charter Set-Aside:
Optionally, ADE sets aside 1% of the Allocation after Admin Set Aside for this purpose. ALL LEAs contribute proportionally to this set aside.

SEAs must then apply adjustments for “maintenance of effort” issues and any applicable prior year adjustments

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Prior Year Adjustments:

After the set-asides have been determined, any previous year’s allocation adjustments must be adjusted for into the current year’s allocations.

These required adjustments can be driven by a variety of reasons: updated data for US ED, correcting for identified errors in the allocation process, the inclusion (or omission) of an LEA after initial allocations are released, etc.

Maintenance of Effort:

If any LEA fails to meet Maintenance of Effort (supplanting test over time), its’ allocation will be reduced proportionately.

Any funds from Maintenance of Effort reductions from an LEA will be dispersed to all other entities within that LEA’s residing county.

Once these steps have been complete and after the Master Calculation Allocation file has been properly reviewed and approved, the Final Title I Grant Allocations to LEAs are posted in the Grants Management System.

What went wrong?

In FY14, an audit identified an issue with Title I LEA Allocations

- ADE received an FY14 State Single Audit finding regarding earmarking for school improvement activities via the School Improvement Fund Set-Aside
- Auditors identified calculation errors that impacted 23 LEAs, for a total questioned value of \$435,831
- It was understood that this issue would have further ramifications due to the “roll forward” to future year calculation files (allocations)

23 LEAs had negative set-asides; others were missing formulas entirely

Documentation from original FY14 Allocations file

ARIZONA DPARTMENT OF EDUCATION TITLE I AND TITLE II ALLOCATIONS FOR FISCAL YEAR ENDING JUNE 30, 2014					
LEA Name	ADJUSTED 2014 Title I Allocations	\$305,747,489	Adjusted Allocation After ADMIN Set-aside	Test	Sec 1003 School Improvement Set Aside
) Legacy Traditional Charter School	\$505,835	\$4,975	\$500,860	\$0	
) IMAC	\$207,455	\$2,040	\$205,415	\$8,217	\$8,217
) IM	\$342,275	\$3,367	\$338,908	\$0	-\$3,405
) Ir	\$16,722	\$164	\$16,557	\$0	
) IF	\$53,301	\$524	\$52,777	\$2,111	\$2,111
) IF	\$96,673	\$951	\$95,722	\$0	
) C	\$254,485	\$2,503	\$251,982	\$0	
) A	\$0	\$0	\$0	\$0	
) M	\$0	\$0	\$0	\$0	\$0
) F	\$24,560	\$242	\$24,319	\$0	
) A	\$0	\$0	\$0	\$0	\$0
) C	\$40,759	\$401	\$40,359	\$0	
) Ir	\$62,707	\$617	\$62,090	\$2,484	\$2,484
) Ir	\$112,872	\$1,110	\$111,762	\$4,470	\$4,470
) S	\$0	\$0	\$0	\$0	\$0
) C	\$0	\$0	\$0	\$0	\$0
) Ir	\$181,327	\$1,783	\$179,544	\$7,182	\$7,182
) Im	\$246,647	\$2,426	\$244,221	\$0	-\$124
) Imag	\$10,931	\$108	\$10,824	\$0	
) Imagine Prep Surprise, Inc.	\$29,786	\$293	\$29,493	\$1,180	\$102

School Improvement Set-Aside included 23 LEAs with negative Set-Aside amounts. Additionally, notice that formulas were manually eliminated from various LEAs, leading to inconsistent application of the set-aside requirement.

ADE's investigation spanned multiple years and uncovered multiple additional (and much more significant) issues

Calculation Process Errors

Incorrect limits on LEA contributions to School Improvement Fund

Inconsistent application of hold harmless

Incorrect order of operations

Lack of adjustments to existing LEAs for the addition of new LEAs

Policy Violations

Lack of proper documentation and records retention

Improper approvals

FY18 allocations, processes, and policies will correct for all of these issues

Cumulative Impact of Calculation Errors

Summary of Cumulative Impact

295	LEAs with overallocated funds
(\$43,612,568)	in total overallocated funds
187	LEAs with underallocated funds
\$9,657,033	in total underallocated funds
(\$33,955,535)	net overallocation
-3%	net change in Title Funding allocated to LEAs

Much of this net over-allocation came from an underfunding of the School Improvement Fund

Calculation Process Errors: *Incorrect limits on LEA contributions to School Improvement Fund*

ESEA guidelines required **4% of total State Title I funding** to be set aside for School Improvement Activities (under section 1003(a) of ESEA). However, no LEA could contribute so much that it lost funding year-over-year.*

ADE ***misinterpreted this provision to be a limit of 4% of any LEA's funding***, which is not accurate.

Year	Actual	Required	Shortfall
FY14 (SY13-14)	\$3.2M	\$12.4M	\$(9.2)M
FY15 (SY14-15)	\$8.7M	\$13.0M	\$(4.3)M
FY16 (SY15-16)	\$6.0M	\$12.9M	\$(6.9)M
FY17 (SY16-17)	\$9.2M	\$13.4M	\$(4.1)M
Total FY14 - FY17	\$27.2M	\$51.7M	\$(24.5)M

*This requirement changes under ESSA to 7% of total funds; in FY18, the provision is 7% of EVERY LEA; beyond FY18, the requirement is 7% in total.

Calculation Process Errors: *Inconsistent application of hold harmless*

The “hold harmless” provision was inconsistently applied, and in one year, not applied at all.

- **FY14:** No Hold Harmless provision applied
- **FY15 – FY17:** Hold Harmless incorrectly applied:
 - Hold harmless included for census LEAs only
 - Did not meet the criteria established for each sub-grant
 - Did not properly pull from each LEA to contribute to LEAs meeting hold harmless provision
 - Incorrect order of operations used

Reminder: Hold Harmless is applied based on established criteria for each of the four sub-grants

Example of “BASIC” grant hold harmless calculation

Anonomized Name	A	B	C	D	E	F	G	H	I	J	K	L
	Prior Year "Reallocated" Amount before HH	HH Rate	Hold Harmless Amount	Current Year "Reallocated" Amount before HH	Hold Harmless Funds Required	Allocations of LEAs Above Hold-Harmless	Adjustment to Allocations to LEAs Above Hold-Harmless	Adjusted Allocations	Further Adjustments Required 4	Allocations of LEAs Above Hold-Harmless	Adjustment to Allocations to LEAs Above Hold-Harmless	Adjusted Allocations - FINAL AFTER HH
Census LEA 375	\$0	85%	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Census LEA 363	\$47,851	85%	\$40,674	\$40,627	\$46	\$0	\$0	\$40,674	\$0	\$0	\$0	\$40,674
Census LEA 376	\$0	95%	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Census LEA 364	\$233,586	90%	\$210,227	\$209,987	\$240	\$0	\$0	\$210,227	\$0	\$0	\$0	\$210,227
Non-Census LEA 412	\$10,605	95%	\$10,075	\$16,596	\$0	\$16,596	(\$206)	\$16,390	\$0	\$16,369	\$0	\$16,369
Non-Census LEA 388	\$74,595	95%	\$70,866	\$71,125	\$0	\$71,125	(\$882)	\$70,243	\$0	\$0	\$0	\$70,866
Non-Census LEA 409	\$52,811	95%	\$50,170	\$50,577	\$0	\$50,577	(\$627)	\$49,951	\$0	\$0	\$0	\$50,170
Non-Census LEA 410	\$15,489	90%	\$13,940	\$29,767	\$0	\$29,767	(\$369)	\$29,398	\$0	\$29,361	\$0	\$29,361
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Non-Census LEA 390	\$26,104	95%	\$24,799	\$20,547	\$4,252	\$0	\$0	\$24,799	\$0	\$0	\$0	\$24,799
Non-Census LEA 406	\$41,786	95%	\$39,697	\$21,074	\$18,623	\$0	\$0	\$39,697	\$0	\$0	\$0	\$39,697

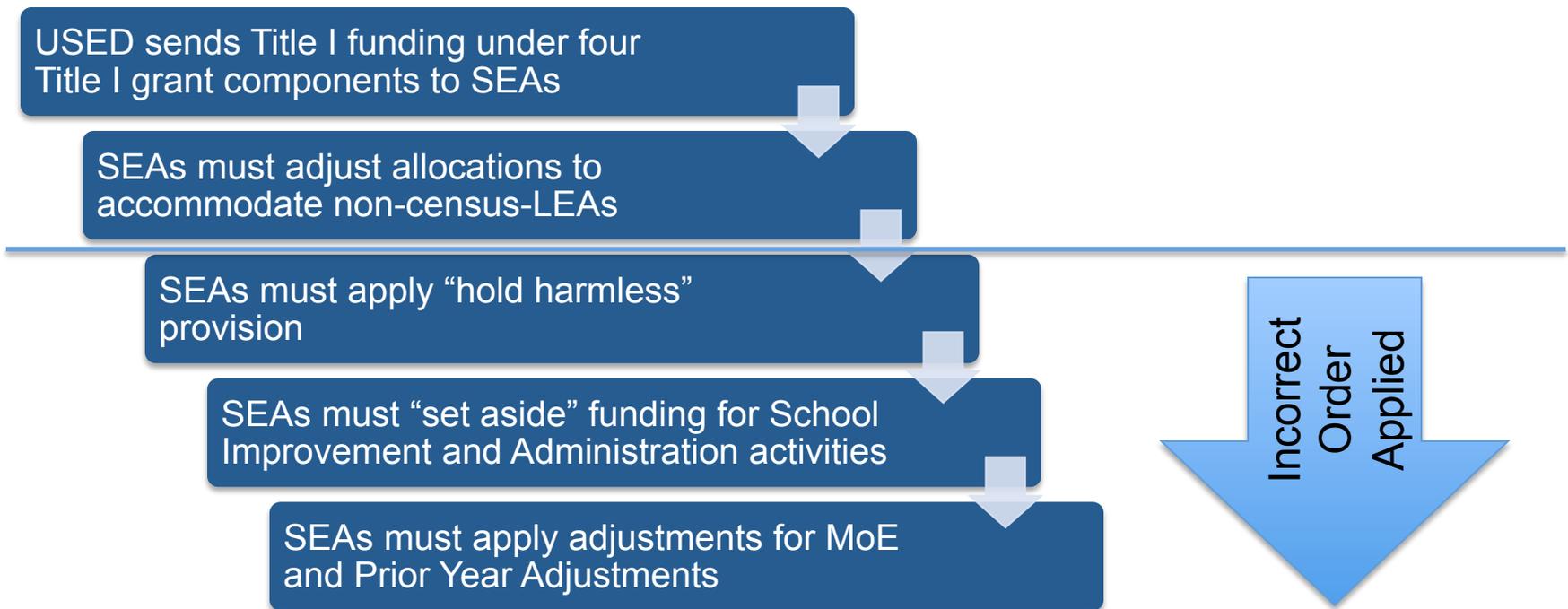
Using each LEA’s “Hold Harmless Rate” of 85%, 90%, or 95% (determined by poverty and enrollment counts) and the prior year sub-grant allocation before set-asides, the minimum funding for each LEA amount is determined.

LEAs falling below their minimum requirement will be brought up to their minimum funding level. This is “funded” by taking proportionately from other LEAs being allocated an amount above their minimum funding level.

This process must be iterated upon until ALL LEAs in the State are funded at or above their minimum funding level.

Calculation Process Errors: *Incorrect order of operations*

Each part of the calculation process builds upon the previous; reordering steps in the process changes allocation amounts. The Order of Operations was done incorrectly in all years.



Calculation Process Errors: *Lack of adjustments to existing LEAs for the addition of new LEAs*

- Because of the interrelated nature of all the formulas for allocations, if an LEA is added, all other LEAs will be impacted (especially those in the same county as the added LEA)
- Grants loads were not updated to reflect the allocation of dollars to new LEAs, nor were prior year adjustments tracked and applied
- In most years, this amounted to over \$2M of over-allocated funding.

Policy violations enabled these calculation errors to persist for years without being caught

Policy violations generally fell in two categories:

1. Lack of record retention
2. Improper approvals

Examples of policy violations included:

- Adjusting allocations provided to LEAs with no documentation of approval
- Grants system loads were done with no corresponding file retained
- No record of approvals retained

ADE is in the process of ensuring policies are appropriate for the revised allocation process

How is this being fixed?

Post-mortem: *Why did this happen and how can we prevent similar issues?*

A combination of factors likely contributed to this situation. Practices that can prevent this moving forward include:

Proper Policies and Procedures:

- Ensuring policies and procedures remain updated
- Asking questions when policies and procedures are unclear

Process Integrity

- Adhering to policies and procedures
- Ensuring proper checks and balances in the process (and improving policy where needed)
- Ensuring data integrity and maintaining proper documentation

Effective Communication

- Raising issues for proper resolution
- Communicating effectively, particularly cross-functionally/departmentally

Improvements are being implemented to address these core root causes

Process improvements and trainings will prevent future errors

- A **corrected template**, reviewed and vetted by US Department of Education, has been used for FY18 and will be used for future years
- This corrected template is accompanied by a detailed **Standard Operating Procedure**, which thoroughly explains how to complete allocation procedures
- ADE and Afton will continue to **train and support Title I leadership** and **cross-training** backup personnel as identified

Process Integrity

Proper Policies and Procedures

Effective Communications

These documents are available for review on ADE's Title I website

What can you expect next?

- ADE is committed to resolving the FY14 audit finding with as minimal disruption to LEAs as possible; ADE has proposed to USED:
 - No reductions or holdbacks in future funding to LEAs that were historically overfunded
 - Making historically underfunded LEAs whole over the course of no longer than 2-5 years as unobligated funds become available
- ADE's updated procedures and allocations files are publicly available on the ADE Title I website
- ADE will notify LEAs once negotiations with USED are completed and the resolution plan is approved

**ADE's response to USED is publicly available
on the ADE Title I website**

Supplemental Slides

The audit finding remained unaddressed until resurrected by new Title I leadership

Action	Timeline
FY14 Single Audit identified the SI Set-Aside error in FY14 Allocations	June 2014
Superintendent Douglas elected	November 2014
ADE initially notified regarding Title I audit finding	December 2014
New Administration begins	January 2015
FY14 Single Audit finding published by State Auditor General	March 2015
Date ADE corrective action per State Auditor was to have been completed	June 30, 2015
USED publishes findings affirming State finding	May 2106
Date ADE required to complete corrective action per USED	July 31, 2016
FY14 audit finding discovered as unresolved	November 2016
New Title I leadership takes office	November 2016
Initial responses by new Title I leadership to USED	Dec 2016 – Feb 2017
Process to identify a qualified firm to help address the finding begins	March 2017
Afton Partners identified	April 2017
Afton Partners contract begins	June 2017
Response to Audit Finding sent to USED	November 2017