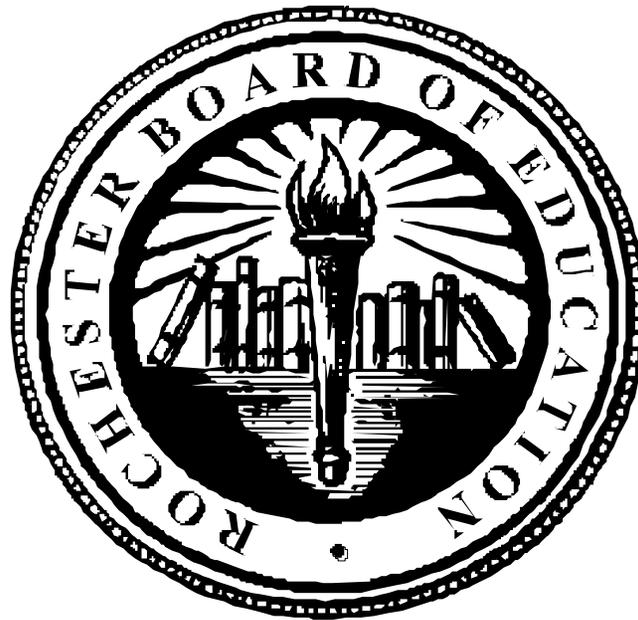


OFFICE OF AUDITOR GENERAL



External Education Follow Up

March 2015



External Education - Follow Up Executive Summary

OBJECTIVE

To follow up on management's corrective actions taken on recommendations issued in the External Education Audit issued in April 2010.

BACKGROUND

The External Education Department has oversight for the Committee on Special Education (CSE) process and facilitates the placement for all students in non-RCSD schools and educational programs. External programs include private/parochial schools, Charter Schools, Home School, the Urban Suburban program, BOCES and other agency settings. Students may be externally placed by their parents, the CSE, the court or another authorized agency. Each type of external placement is governed by specific and different New York State regulations that must be complied with. External Education holds the related CSE meetings for initial eligibility determination, annual reviews, and re-evaluations, requests for review and manifestation hearings for suspension. The department has oversight for the CSE process for students who are considered to be 'incarcerated youth'. These responsibilities include the identification, evaluation, supervision and coordination of service delivery after the student has been accepted into a non RCSD program.

SCOPE

We inquired of management to obtain the current status on audit recommendations issued in the 2010 External Education Audit Report. We specifically evaluated operating procedures and controls implemented to address recommendations made to management in the original audit report and obtained sufficient evidence to verify the current status of the original recommendations.

CONCLUSION

Formal protocols and procedures for External Education do not exist for all relevant areas. Existing protocols and procedures should be evaluated to ensure they are appropriate for the current operating environment. Communication processes have not been developed with the various departments who support students in agency placements. Agency contracts have been standardized, but processes to monitor contracts do not exist. Other External Education monitoring procedures have been partially implemented including attendance, suspensions, placement and transfers, but these processes require oversight to ensure the monitoring is being performed. No changes have been made to the billing process, except that the External Education department is now communicating student status change reports to Finance.



External Education - Follow Up Summary of Recommendations

| Rec# | Status | Recommendations |
|------|---------------------------|---|
| 1 | <i>Open</i> | <i>Develop protocols and procedures for the entire External Education process, including billing verification. Communicate and enforce compliance with the formalized protocols and procedures once implemented.</i> |
| 2 | <i>Partially Complete</i> | <i>Establish a formal evaluation process including comprehensive student analysis to evaluate District program offerings against services outsourced to agencies. Compare and contrast components of external program sites that the District is lacking. If feasible, provide additional student programs to meet the needs of Special Education students currently enrolled at agencies. Identify, develop and implement reporting that includes relevant information that should be monitored to facilitate effective management of External Education.</i> |
| 3 | <i>Partially Complete</i> | <i>Designate responsibility for monitoring agency contractual agreements and ensure that contracts remain current with specified service and reporting expectations. Implement effective monitoring procedures to ensure that agency services are executed as required by regulations and IEP plans. Consider including: required meeting attendance, audit capability, reporting requirements for service logs and progress reports.</i> |
| 4 | <i>Partially Complete</i> | <i>Actively work with agencies to obtain bills in an electronic format to simplify monitoring. Determine the feasibility of designating responsibility for bill monitoring to the External Education department and create a standard process to log student changes throughout the year for billing verification.</i> |
| 5 | <i>Open</i> | <i>Create a formal communication process for key communications to departments involved in processes in support of students with agency placements. These processes should include, but not be limited to: program availability, student enrollments and transfers, transportation changes, and Medicaid eligible placements.</i> |
| 6 | <i>Partially Complete</i> | <i>Establish a comprehensive process to ensure that RCSD students enrolled at agencies have a clear affiliation for extracurricular activities and graduation requirements. Also, ensure that secondary transcript information is entered in Chancery on an annual basis.</i> |
| 7 | <i>Partially Complete</i> | <i>Establish, communicate and implement effective procedures to monitor RCSD Special Education students at agencies. At a minimum, implement procedures that ensure attendance is monitored, disciplinary reviews and suspensions are evaluated and recorded, students waiting for placement and transfers are monitored, and progress reports from agencies are monitored and reviewed.</i> |