



U.S. Department of Education
Office of Inspector General

The West Virginia Department of Education's Implementation of Selected Components of West Virginia's Statewide Accountability System

September 29, 2025
ED-OIG/A24IL0200

NOTICE

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UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

Audit Services

September 29, 2025

Michele L. Blatt
State Superintendent
West Virginia Department of Education
1900 Kanawha Boulevard East
Charleston, WV 25305

Dear Superintendent Blatt:

Enclosed is our final audit report, "The West Virginia Department of Education's Implementation of Selected Components of West Virginia's Statewide Accountability System," Control Number ED-OIG/A24IL0200. This report incorporates the comments you provided in response to the draft report. The U.S. Department of Education's policy is to expedite audit resolution by timely acting on findings and recommendations. Therefore, if you have any additional comments or information that you believe may have a bearing on the resolution of this audit, you should send them directly to the following Department of Education official, who will consider them before taking final Departmental action on this audit:

Hayley Sanon
Acting Assistant Secretary
Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

We appreciate your cooperation during this audit. If you have any questions, please contact me at (916) 213-7630 or Ben.Sanders@ed.gov.

Sincerely,

/s/

Ben C. Sanders
Director, Elementary and Secondary Education Oversight Team

Enclosure

Results in Brief

The West Virginia Department of Education's Implementation of Selected Components of West Virginia's Statewide Accountability System



Why Did the OIG Perform This Audit?

The U.S. Department of Education (Department) allocates funds to States through statutory formulas based primarily on census poverty estimates and the cost of education in each State. To receive funding, a State plan that includes a description of its accountability system must be submitted to the Department for review and approval.

For the 2022–2023 and 2023–2024 Federal funding periods, the West Virginia Department of Education (WVDE) was awarded about \$107 million and \$105 million in Title I, Part A funds, respectively. The Elementary and Secondary Education Act of 1965, as amended, requires States to reserve a portion of their Title I funds to provide technical assistance and support for local educational agencies (LEA) with schools whose students are most in need of the additional support to improve their academic performance. Therefore, it is essential that the funds reach those students.

The objective of our audit was to determine whether WVDE implemented selected components of its statewide accountability system in the fall of 2022 based on data for school year 2021–2022.

What Did the OIG Find?

We found that WVDE generally implemented selected components of the statewide accountability system in accordance with West Virginia's State plan and amendments and WVDE's policies and procedures ([Finding 1](#)) and correctly allocated additional funding to LEAs with schools identified in the fall of 2022 as needing additional support ([Finding 2](#)). However, WVDE incorrectly identified for additional support and improvement 12 schools that were not eligible for additional support services ([Finding 3](#)). Additionally, WVDE did not always keep records showing that it provided additional support services, such as planning and collaboration, diagnostic and monitoring activities, and technical assistance, to LEAs with schools identified as needing additional support ([Finding 4](#)).

What Is the Impact?

Stakeholders have reasonable assurance that WVDE is implementing critical Title I-related components of West Virginia's statewide accountability system in accordance with the approved State plan and amendments and WVDE's policies and procedures. However, the ineligible schools that received additional support services benefited from valuable resources to which they were not entitled and that could have benefited eligible schools in need of additional support. Additionally, stakeholders do not have sufficient assurances that WVDE is providing LEAs and schools with all the planning and collaboration, diagnostic and monitoring activities, and technical assistance they need to improve their students' academic performance.

What Are the Next Steps?

We recommend that the Assistant Secretary for Elementary and Secondary Education verify that WVDE correctly applied the procedures described in West Virginia's approved State plan when it identifies schools for additional support in the fall of 2025 and require WVDE to keep records showing that it is delivering the additional support services that it promised the LEAs and schools.

We provided a draft of this report to WVDE for comment. WVDE did not comment on Findings 1 and 2. It generally agreed with Finding 3, but disagreed with Finding 4 and the related recommendation. We summarize WVDE's comments and provide our responses at the end of each finding, where applicable. We also provide the full text of WVDE's comments at the end of the report ([WVDE Comments](#)).

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Introduction

Background

The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015 (ESEA), authorizes the U.S. Department of Education (Department) to provide grants to States and local educational agencies (LEA) to improve the quality of elementary and secondary education. The ESEA consists of nine formula grant programs, including Title I (Improving the Academic Achievement of the Disadvantaged). The purpose of Title I is to provide all children significant opportunity to receive a fair, equitable, and high-quality education and to close educational achievement gaps. Title I, Part A provides financial assistance to LEAs and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging State academic standards. The Office of School Support and Accountability within the Department's Office of Elementary and Secondary Education is responsible for administering and overseeing the Title I, Part A program.

The Department allocates Title I, Part A funds to States through four statutory formulas that are based primarily on census poverty estimates and the cost of education in each State. Section 1003 of the ESEA requires each State to reserve at least 7 percent of its Title I allocation or the sum of the amount the State reserved and received for fiscal year 2016 (whichever is greater) to carry out a statewide system of technical assistance and support for LEAs. For Federal fiscal years 2021 through 2024, Congress authorized about \$70.9 billion for grants to States and LEAs for activities allowed under Title I, Part A.

To receive funding under the ESEA, a State must submit a State plan to the Department for review and approval. The State plan is intended to hold States accountable for student academic achievement and school success and is required to include a description of the statewide accountability system. That accountability system should be based on challenging academic standards to improve student academic achievement and school success. The State should design its accountability system to measure progress toward achieving established long-term goals for reading or language arts and math proficiency, graduation rates, and English language proficiency for all students and separately for each student subgroup. The accountability system should include the following components: (1) long-term goals, (2) indicators used to measure student academic achievement and school success, (3) annual meaningful differentiation of

schools,¹ (4) identification of low-performing schools and any additional statewide categories of schools, and (5) annual measurement of student academic achievement.

According to section 1111(a)(6), a State's approved plan remains in effect for the duration of the State's participation in ESEA programs. If at any time a State wants to make significant changes to its plan, it must submit a request to the Department in the form of revisions or amendments to the State plan.

The West Virginia Board of Education and the West Virginia Department of Education (WVDE) work together to establish policies and procedures that promote the equitable implementation of West Virginia's public education goals. According to its mission statement, WVDE focuses on leading a thorough, efficient, and effective education system; improving student achievement and accountability; developing economic preparedness of students; and expanding the number of high-quality educators and leaders. Through its various offices, WVDE is responsible for monitoring and implementing the statewide accountability system and supporting a framework for continuous school improvement (Office of Support and Accountability); assuring that Federal education funding for the ESEA programs is administered properly (Office of ESEA Programs and School Improvement); and improving results for children and youth with exceptionalities, primarily by providing financial and other support to LEAs and schools identified as needing additional support based on low-performing special education subgroups (Office of Special Education). For the Federal funding periods from July 1, 2022, through September 30, 2023, and July 1, 2023, through September 30, 2024, the Department awarded WVDE \$107.2 million and \$105.3 million in Title I, Part A funds, respectively.

¹ A system that a State designs to annually make accountability determinations based on multiple indicators for each school and each school's student subgroups to differentiate its overall performance and quality from other schools.

West Virginia's State Plan, Waivers, Amendments, and Statewide Accountability System

WVDE submitted an initial version of West Virginia's State plan to the Department on September 11, 2017,² and resubmitted a final version on January 9, 2018. The Department approved the plan on January 10, 2018. West Virginia's State plan established the processes that WVDE should follow to identify schools for additional support in three school improvement categories: comprehensive support and improvement (CSI), targeted support and improvement (TSI), and additional targeted support and improvement (ATSI).

- **CSI.** Schools identified as needing CSI are generally the lowest-performing 5 percent of all schools in West Virginia that received Title I, Part A funds and public high schools with a graduation rate of 67 percent or less.
- **TSI.** Schools identified as needing TSI are generally those with one or more consistently underperforming student subgroups.
- **ATSI.** Schools identified as needing ATSI are generally those in which any student subgroup on its own would lead to identification for CSI.

West Virginia's State plan also established a process to identify schools for comprehensive support and improvement-additional targeted support and improvement (CSI-ATS). Schools identified as needing CSI-ATS are generally those schools receiving Title I, Part A funds that were previously identified as needing ATSI and that have not satisfied the exit criteria for such schools after 3 years. CSI-ATS is not a separate school improvement category, but rather a way for WVDE to refer to ATSI schools that did not exit timely and were therefore identified as needing CSI. These schools are referred to as CSI-ATS schools to distinguish them from the schools meeting the criteria for CSI identification. West Virginia's State plan also established the factors that WVDE should use to identify and classify schools for additional support: (1) academic achievement, (2) academic progress, (3) graduation rate, (4) English language proficiency, and (5) student success. The State plan identified required resources and additional support services for schools specifically identified as needing CSI. It did not identify the same information for schools specifically identified as needing ATSI.

² The approved State plans and amendments for all States are publicly available on the Department's [website](#).

Waivers

On March 27, 2020, the Department provided WVDE with a waiver from the statewide assessment, accountability, and reporting requirements for school year 2019–2020 because of disruptions that the Coronavirus Disease 2019 (COVID-19) pandemic caused. On April 6, 2021, the Department provided WVDE with another waiver, this time from the accountability, school identification, and reporting requirements for school year 2020–2021. As a condition of that waiver, WVDE agreed to identify public schools for CSI, TSI, and ATSI in the fall of 2022 to ensure that the identification of schools needing additional support resumed quickly.

Amendments

WVDE submitted amendments to West Virginia’s State plan on May 9, 2019, February 27, 2020, and June 9, 2022. These amendments reflected changes that WVDE made to selected components of the accountability system. The Department approved WVDE’s amendments on July 12, 2019, June 16, 2020, and August 15, 2022, respectively.

Statewide Accountability System

WVDE’s statewide accountability system focuses on providing meaningful feedback about LEA and school performance overall and by subgroups of students. It covers 10 student subgroups: (1) economically disadvantaged students, (2) English language learners, (3) children with disabilities, (4) American Indian or Alaska Native students, (5) Asian students, (6) Black or African American students, (7) Hispanic or Latino students, (8) multiracial students, (9) Pacific Islander students, and (10) White students. Student subgroups are assigned performance level ratings for each indicator used to measure student academic achievement and school success.

WVDE’s “West Virginia’s Statewide Accountability System Methodology” (Methodology Guide) describes the procedures for calculating the indicators used to measure student academic achievement and school success and assigning performance level ratings to each school and each student subgroup. Its “Comprehensive Support and Improvement Schools School Improvement Process” and “Continuous School Improvement-Additional Targeted Support Subgroup Special Education Process Three Year Plan” describe the 3-year process to support schools identified as needing CSI and CSI-ATS and list the additional support services to be provided to those schools for the 3 school years following the fall 2022 identification.

The COVID-19 Pandemic's Impact on WVDE's Statewide Accountability System

The COVID-19 pandemic impacted WVDE's ability to perform or complete certain activities. As a result of the COVID-19 pandemic, WVDE did not perform or modified the following activities that were covered in the waivers, amendments, and Methodology Guide.

- WVDE did not administer statewide summative assessments during the 2019–2020 school year and therefore could not calculate the academic achievement indicators for the 2019–2020 school year. Additionally, because 2 consecutive years of statewide summative assessments data are needed to calculate the academic progress indicators, WVDE also could not calculate the academic progress indicators for the 2020–2021 school year.
- WVDE did not identify schools as needing TSI in the fall of 2022. WVDE identifies schools as needing TSI when a non-CSI school had one or more underperforming subgroup of students for 3 consecutive years. Because the Department provided WVDE with a waiver for assessment requirements for the 2019–2020 school year and school identification requirements based on data from the 2020–2021 school year, WVDE could not calculate the academic progress indicators that would have been used to identify schools as needing TSI in the fall of 2022.
- For schools identified as needing CSI or ATSI in the fall of 2018, WVDE modified its timeline for them to exit CSI or ATSI status from 3 years to 4 years. Following the modified timeline, those schools would have exited CSI or ATSI status in the fall of 2022 (4 years later) instead of the fall of 2021 (3 years later) if they met statewide exit criteria. WVDE reverted the timeline back to 3 years for schools identified as needing CSI or ATSI in the fall of 2022 and future years. Accordingly, those schools will exit after 3 years if they meet statewide exit criteria.

Audit Results

WVDE generally implemented the three selected components³ of its statewide accountability system and provided additional funding and support services to LEAs with schools identified for additional support and improvement in accordance with West Virginia's approved State plan and amendments and WVDE's policies and procedures. However, we identified a small number of exceptions related to its identification of ATSI schools and records retention.

1. **Indicators used to measure student academic achievement and school success.** WVDE implemented the indicators used to measure student academic achievement and school success in accordance with West Virginia's approved State plan and amendments and WVDE's policies and procedures ([Finding 1](#)).
2. **Annual meaningful differentiation.** WVDE applied a system of annual meaningful differentiation to identify differences in school performance in accordance with West Virginia's approved State plan and amendments and WVDE's policies and procedures ([Finding 1](#)).
3. **Identification of schools needing CSI, CSI-ATS, and ATSI.** WVDE correctly identified 307 of the 319 public schools that it identified as needing CSI, CSI-ATS, and ATSI in accordance with West Virginia's approved State plan and amendments ([Finding 1](#)). It incorrectly identified 12 public schools for ATSI that were ineligible for that additional support ([Finding 3](#)).
4. **Additional funding and support services provided to schools identified as needing CSI and CSI-ATS.** WVDE provided additional funding and support services to LEAs with schools identified as needing additional support and improvement in accordance with West Virginia's approved State plan and WVDE's policies and procedures ([Finding 2](#)). However, WVDE did not always keep records showing that it provided the additional support services to schools it identified as needing CSI or CSI-ATS in the fall of 2022 ([Finding 4](#)).⁴

³ The three selected components were (1) indicators used to measure student academic achievement and school success, (2) annual meaningful differentiation, and (3) identification of schools needing additional support.

⁴ Neither the ESEA nor WVDE's State plan requires WVDE to provide additional funding or support services to LEAs with schools needing ATSI.

Finding 1. WVDE Generally Implemented Selected Components of the Statewide Accountability System as Designed

We found that WVDE implemented the indicators used to measure student academic achievement and school success and applied a system of annual meaningful differentiation in accordance with West Virginia's approved State plan and amendments and WVDE's Methodology Guide. WVDE also correctly identified the 307 public schools needing CSI, CSI-ATS, or ATSI in the fall of 2022 in accordance with West Virginia's approved State plan and amendments. We identified a small number of exceptions related to WVDE's identification of additional schools for ATSI and retention of additional support services records, and discuss that information in Findings [3](#) and [4](#), respectively. Findings 1 and [2](#) focus on the activities and processes that WVDE executed in accordance with applicable requirements.

Implementation of the Indicators Used to Measure Student Academic Achievement and School Success

We compared the indicators in WVDE's Methodology Guide to the indicators established in West Virginia's approved State plan and amendments and found that they matched. For elementary and middle schools, WVDE measured student academic achievement and school success using the seven indicators identified in West Virginia's approved State plan and amendments: (1) English language arts (ELA) performance, (2) mathematics performance, (3) ELA progress, (4) mathematics progress, (5) English language proficiency progress, (6) attendance, and (7) behavior. For high schools, WVDE measured student academic achievement and school success using the eight indicators identified in West Virginia's approved State plan and amendments: (1) ELA performance, (2) mathematics performance, (3) 4-year cohort graduation rate, (4) 5-year cohort graduation rate, (5) English language proficiency progress, (6) attendance, (7) on-track to graduation, and (8) post-secondary achievement.

Application of a System of Annual Meaningful Differentiation

WVDE applied a system of annual meaningful differentiation to identify differences in school performance in accordance with West Virginia's State plan and amendments and its Methodology Guide. To apply annual meaningful differentiation, WVDE first calculated the indicators for each school's student subgroups. It then assigned each student academic achievement and school success indicator for each student subgroup a performance level rating of (1) exceeds standard, (2) meets standard, (3) partially meets standard, or (4) does not meet standard.

WVDE established performance level rating cut scores for each indicator of student academic achievement and school success included in its Methodology Guide and West Virginia's approved State plan and amendments. It used the cut scores for each indicator to assign a performance level rating to each student subgroup that had at least 20 students.

We selected a nonstatistical random sample of 65 (10 percent) of 646 West Virginia public schools that were operating during school year 2021–2022 to assess whether WVDE correctly applied the system of annual meaningful differentiation. Following the procedures described in WVDE's Methodology Guide, we calculated each indicator score for each school and student subgroup for which WVDE calculated indicator scores in the fall of 2022. We compared the indicator scores that we calculated to the indicator scores that WVDE calculated and found that they matched. Since there were no discrepancies identified, we concluded that WVDE had correctly calculated indicator scores for each indicator and student subgroup and applied the system of annual meaningful differentiation for all 65 schools included in our sample in accordance with West Virginia's State plan and amendments and the procedures described in WVDE's Methodology Guide.

Identification of Schools Needing CSI, CSI-ATS, or ATSI

WVDE identified 319 public schools in the fall of 2022 as needing CSI, CSI-ATS, or ATSI. It correctly identified the 307 public schools needing CSI, CSI-ATS, or ATSI in accordance with West Virginia's approved State plan and amendments. However, as discussed in [Finding 3](#), WVDE incorrectly identified an additional 12 schools for ATSI that were not eligible for that support.

CSI

WVDE based its identification of schools needing CSI on the performance level ratings assigned to each school for school year 2021–2022. As noted earlier in the report, schools identified as needing CSI are generally the lowest-performing 5 percent of all schools in West Virginia that received Title I, Part A funds and public high schools with a graduation rate of 67 percent or less. WVDE assigned CSI schools as schools performing unsatisfactorily (1) across all indicators, (2) on student academic achievement indicators and one school success indicator, or (3) solely on student academic achievement indicators.

If the total number of schools assigned to the three categories did not constitute at least 5 percent of all Title I schools, WVDE took steps to identify additional schools for CSI until the 5 percent threshold was met. Specifically, for the remaining Title I schools (those not assigned to any of the three categories), WVDE aggregated the percentage

point values on each of the student academic achievement indicators. It then selected schools with the lowest aggregate score until it reached the minimum 5 percent requirement.

ATSI and CSI-ATS

WVDE identified schools as needing ATSI if they were not previously identified as needing CSI during the last CSI determination period and any individual subgroup of students, on its own, met the criteria for CSI identification. Any Title I school previously identified as needing ATSI that did not satisfy the relevant statewide exit criteria after 3 years of receiving additional support was identified for continued support under the provisions described for CSI. WVDE refers to these schools as needing CSI-ATS.

Finding 2. WVDE Provided Additional Funding to LEAs with Schools Needing Additional Support

WVDE allocated additional funding to LEAs with schools identified in the fall of 2022 as needing additional support based on data for school year 2021–2022 in accordance with WVDE’s funding methodology. We reviewed reports on the additional funding that WVDE provided to LEAs with schools identified in the fall of 2022 as needing additional support. In accordance with section 1003 of Title I of the ESEA, WVDE (through its Office of ESEA Programs and School Improvement) provided additional funding to LEAs with schools identified as needing CSI or CSI-ATS in the fall of 2022 using the part of its Title I allocation that it reserved for section 1111(d) school improvement activities. Specifically, WVDE provided additional funding to the 48 LEAs with 74⁵ public schools that it identified for CSI or CSI-ATS based on their assigned performance level ratings for school year 2021–2022. It allocated \$10.7 million in additional funding to those 48 LEAs during school years 2022–2023 and 2023–2024 in accordance with WVDE’s funding methodology.

According to West Virginia’s approved State plan, WVDE annually determines the portion of Title I, Part A funds reserved under section 1003 of the ESEA for school improvement activities that will be distributed to LEAs with schools identified as needing CSI or TSI.⁶ According to WVDE’s coordinator of ESEA Programs and School Improvement, for the 2022–2023 school year, the Title I set-aside funds were divided between the CSI and CSI-ATS school improvement categories: 50 percent went to the schools identified for CSI in the fall of 2018 and the other 50 percent was divided on a 60/40 basis between schools identified for CSI (received 60 percent of remaining funds) or CSI-ATS (received 40 percent of remaining funds) in the fall of 2022. For the 2023–2024 school year, the Title I set-aside funds were divided on a 60/40 basis between the CSI and CSI-ATS school improvement categories in the fall of 2022: 60 percent went to the schools identified for CSI and 40 percent went to the schools identified for CSI-ATS. For both school years, the Title I set-aside funds for each school improvement category (CSI and CSI-ATS) were allocated to schools as follows: 30 percent was allocated equally

⁵ Two additional public schools were identified as needing additional support. However, they closed during school year 2022–2023 and were not allocated additional funds.

⁶ Neither the ESEA nor WVDE’s State plan requires WVDE to provide additional funding or support services to LEAs with schools identified as needing ATSI. According to WVDE, LEAs are responsible for providing additional support services to schools identified as needing ATSI.

across the schools and 70 percent was allocated pro rata to schools based on their student enrollment.

Finding 3. WVDE Identified 12 Schools for ATSI That It Should Not Have Identified in the Fall of 2022

WVDE identified 243 public schools as needing ATSI in the fall of 2022. However, 12 (5 percent) of the 243 schools were not eligible for ATSI because they did not meet the minimum number of students per subgroup restriction established in West Virginia’s approved State plan.

According to West Virginia’s approved State plan, identifying schools for ATSI follows the same sequence of steps as described for identifying schools for CSI. The criteria for identifying schools as needing CSI (and ATSI), in part, includes having a 4-year cohort graduation rate below 67 percent and a minimum number of 20 students per subgroup. West Virginia set the minimum number of students per subgroup restriction for accountability purposes; that is, to ensure valid and reliable results when identifying schools for additional support based on the performance level ratings of an individual subgroup of students. When identifying schools for ATSI, WVDE correctly applied the 67 percent 4-year cohort graduation rate criterion but did not consider or correctly apply the minimum number of 20 students per subgroup restriction. As a result, WVDE incorrectly identified for ATSI 12 schools that were not eligible. Although the 12 schools had student subgroups with 4-year cohort graduation rates that were below 67 percent, those subgroups had less than 20 students (did not meet the minimum number of students per subgroup restriction) and therefore should have been excluded from WVDE’s list of public schools eligible for ATSI. The ineligible schools may have received valuable resources provided by LEAs for which they were not entitled and that could have benefited other schools in need of and eligible for additional support services.

At the exit conference, the director of WVDE’s Office of Data Analysis and Research told us that WVDE made the necessary changes to correctly apply the minimum number of students per subgroup restriction. Since we learned of this towards the end of our fieldwork, we did not perform additional work to verify that WVDE made the necessary changes.

Recommendations

We recommend that the Assistant Secretary for Elementary and Secondary Education verify that WVDE—

- 3.1 Correctly applied the minimum number of students per subgroup restriction when it identifies schools for ATSI in the fall of 2025.

3.2 Does not consider the 12 schools that it incorrectly identified for ATSI for CSI-ATS identification in the fall of 2025.

WVDE Comments

WVDE agreed that it identified 12 schools for ATSI that it should not have identified in the fall of 2022, but disagreed with some statements in the finding and requested that those statements be modified or removed. WVDE disagreed that we informed it about the 12 schools that were incorrectly identified for ATSI, stating that it was aware of the errors shortly after it made the identifications in the fall of 2022 and that it made the necessary adjustments for future identifications. WVDE also disagreed that the ineligible schools might have received valuable resources provided by LEAs for which they were not entitled and that could have benefited other schools in need of and eligible for additional support services. WVDE stated that, upon request, it provides additional support and technical assistance to LEAs and schools identified for ATSI and technical assistance to all LEAs and schools regardless of identification status. It further stated that LEAs and schools are ultimately responsible for identifying specific needs and providing additional support services to schools identified for ATSI. WVDE noted that it does not provide additional funding or support services specific to ATSI schools, and therefore does not track support services for ATSI schools at the State educational agency level or have a mechanism in place to identify additional support services that may or may not have been provided by LEAs.

Regarding Recommendation 3.1, WVDE stated that it could provide documentation to support that it correctly applied the minimum number of students per subgroup restriction when identifying schools for ATSI in the fall of 2025. Regarding Recommendation 3.2, WVDE stated that the schools incorrectly identified for ATSI in the fall of 2022 have not been identified as CSI-ATS schools based on previous ATSI identification.

OIG Response

We did not make any substantive changes to the finding. However, we made a few technical edits based on WVDE's comments. Recognizing that WVDE will next identify schools for additional support in the fall of 2025 (after this report is issued), we slightly modified the recommendations to request that the Department verify WVDE's implementation of the corrective actions as described. If implemented as described, WVDE's corrective actions are responsive to Recommendations 3.1 and 3.2.

Regarding WVDE's claim that we did not inform it about the 12 schools that were incorrectly identified for ATSI, at no point during the audit did WVDE provide us with a corrected list of identified schools that would have demonstrated that it knew about the

errors. Additionally, WVDE acknowledged in its response to the draft report that it was unable to verify when the identification errors were communicated to LEAs and schools. However, because it is unclear when WVDE first learned of the identification errors, we removed from the finding the verbiage indicating that WVDE made the necessary corrections after we informed it of the errors.

Regarding WVDE's position that ineligible schools would not have received valuable resources from LEAs for which they were not entitled and that could have benefited other schools in need of and eligible for additional support services, we disagree and point to two statements in WVDE's response as support for our position. First, as WVDE noted, LEAs are responsible for providing additional support services to schools identified as needing ATSI. Second, WVDE stated that it does not track support services for ATSI schools at the State educational agency level or have a mechanism in place to identify additional support services that may or may not have been provided by LEAs. Without that information, it would be difficult for WVDE (or any other State educational agency in a similar position) to conclude with sufficient confidence whether ineligible schools received or did not receive valuable resources provided by LEAs for which they were not entitled.

Finding 4. WVDE Did Not Always Keep Sufficient Records to Show That It Provided Additional Support Services to LEAs with Schools Identified as Needing CSI or CSI-ATS

WVDE did not always keep sufficient records to show that it provided additional support services to LEAs with schools identified as needing CSI or CSI-ATS in accordance with West Virginia's approved State plan and WVDE's policies and procedures. To determine whether WVDE provided additional support services to LEAs with CSI or CSI-ATS schools as required, we reviewed the records of support services that WVDE maintained for 5 (24 percent) of 21 CSI schools and 5 (9 percent) of 55 CSI-ATS schools identified as needing additional support in the fall of 2022.⁷ We requested records for school years 2022–2023 and 2023–2024. Overall, WVDE provided us with 94 percent of the records that we requested for CSI schools and 80 percent of the records that we requested for CSI-ATS schools.

West Virginia's approved State plan identifies the required resources and support for LEAs with CSI schools. The plan does not identify this same information for LEAs with CSI-ATS schools. WVDE developed written plans that describe the 3-year process to support LEAs with schools identified as needing CSI or CSI-ATS (one plan for CSI schools and one plan for CSI-ATS schools). The plans, in part, list the additional support services that should be provided to LEAs with CSI and CSI-ATS schools during the 3 school years following the fall 2022 identification. This support should consist of planning and collaboration, diagnostic and monitoring activities, and technical assistance from WVDE.

Review of WVDE's Records of Additional Support Services Provided to LEAs with CSI Schools

For the five CSI schools included in our sample, we requested and reviewed records of additional support services maintained by WVDE to determine whether those schools received the additional support services they should have received per West Virginia's approved State plan and WVDE's written plan. Overall, WVDE provided us with

⁷ We used nonstatistical stratified random sampling to select the 10 schools for review. See the [Sampling Methodology](#) section for additional information.

286 (94 percent) of the 305 records that we requested for school years 2022–2023 and 2023–2024.

- For school year 2022–2023, we asked for records showing that the 5 CSI schools received the 32 additional support services they should have received, totaling 160 records. WVDE provided us with 150 (94 percent) of the 160 records that we requested. The 10 missing records (6 percent) were related to 4 required diagnostic and monitoring activities.
- For school year 2023–2024, we asked for records showing that the 5 CSI schools received the 29 additional support services they should have received, totaling 145 records. WVDE provided us with 136 (94 percent) of the 145 records that we requested. The nine missing records (6 percent) were related to two technical assistance activities and one diagnostic and monitoring activity.

Review of WVDE’s Records of Additional Support Services Provided to LEAs with CSI-ATS Schools

For the five CSI-ATS schools in our sample, we reviewed records of additional support services maintained by WVDE to determine whether those schools received the additional support services they should have received per WVDE’s written plan. Overall, WVDE provided us with 84 (80 percent) of the 105 records that we requested for school years 2022–2023 and 2023–2024.

- For school year 2022–2023, we asked for records showing that the 5 CSI-ATS schools received the 11 additional support services they should have received, totaling 55 records. WVDE provided us with 45 (82 percent) of the 55 records that we requested. The 10 missing records (18 percent) were related to 2 technical assistance activities, 1 planning and collaboration activity, and 1 diagnostic and monitoring activity.
- For school year 2023–2024, we asked for records showing that the 5 CSI-ATS schools received the 10 additional support services they should have received, totaling 50 records. WVDE provided us with 39 (78 percent) of the 50 records that we requested. The 11 missing records (22 percent) were related to 2 technical assistance activities and 1 planning and collaboration activity.

According to 34 Code of Federal Regulations section 76.730(b) and (e), a State must keep records that fully show how it uses Federal grant funds and other records to facilitate an effective audit. Additionally, a recipient (or subrecipient) of Federal funds must have internal controls that ensure these funds are managed in compliance with applicable Federal statutes, regulations, and terms and conditions of the Federal award

(2 Code of Federal Regulations section 200.303(a)).⁸ Section 3.10 of *Standards for Internal Control in the Federal Government* states that effective documentation assists management by establishing and communicating the who, what, when, where, and why of internal control execution to personnel. Documentation also provides management with a means to retain organizational knowledge, mitigate the risk of having organizational knowledge limited to a few personnel, and communicate organizational knowledge to external parties, such as external auditors.

When it does not keep sufficient records, WVDE cannot show that it is providing LEAs and schools with the additional support services to which they are entitled and that they need to improve their students' academic performance.

Recommendation

We recommend that the Assistant Secretary for Elementary and Secondary Education require WVDE to—

- 4.1 Keep all records showing that it is providing all planning and collaboration, diagnostic and monitoring activities, and technical assistance to LEAs with schools identified as needing CSI or CSI-ATS, as described in West Virginia's approved State plan, WVDE's written plans for CSI and CSI-ATS schools, or both.

WVDE Comments

WVDE disagreed with the finding and recommendation, and requested that the finding be removed from the report or revised to reflect a positive finding. WVDE believed that we misunderstood the purpose of its written plans and how they were expected to be used, noting that the written plans were developed as an overview guide to school improvement based on West Virginia's approved State plan and were intended to provide the State educational agency, LEAs, and schools with an overview of checkpoints of successful progression through the respective CSI and CSI-ATS processes. It stated that the additional resources and support services described in the written plans were not required and nothing in the draft report indicated that WVDE did not provide LEAs and schools, including schools identified for CSI or CSI-ATS, with all resources required under West Virginia's approved State plan. WVDE also said that a key WVDE official was unavailable when we made our site visit to WVDE's offices in

⁸ These internal controls should also align with either the U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government* issued by the Comptroller General of the United States or the "Internal Control-Integrated Framework" issued by the Committee of Sponsoring Organizations of the Treadway Commission.

September 2024, the official was never interviewed by us, and no effort was made by us to obtain input from the director.

Regarding the recommendation, WVDE stated that it will continue to keep records for all required supports described in West Virginia's approved State plan that it provides to LEAs and schools, include language in any newly developed written plans that notes that the plans are meant to be an overview guide for improvement processes at the LEA and school levels, and continue to provide differentiated supports based on specific LEA and school needs.

OIG Response

We did not make any changes to the finding or recommendation based on WVDE's comments. WVDE did not provide any additional documentation showing that it provided all additional support services required under West Virginia's approved State plan and WVDE's written plans. We provided WVDE with multiple opportunities to provide the requested documentation and were flexible regarding the type of documentation we would consider and accept during our testing. For example, when WVDE informed us that a school had administered its own survey instead of the West Virginia School Learning Environment Survey, we requested a copy of the school's survey instead. WVDE did not produce a copy of the school's survey, and we therefore identified it as a documentation issue.

We do not consider the additional resources and services described in WVDE's written plans to be optional. The existing written plans are policies and procedures that WVDE should follow until they are changed. If the written plans were optional as WVDE contends, WVDE would not have had any policies and procedures in place for providing additional resources and support services to CSI-ATS schools because the approved State plan does not cover CSI-ATS schools (it only covers CSI schools). Further, we note that the documentation issues we identified during testing were not limited to the requirements in WVDE's written plans. We also identified documentation issues specific to requirements in West Virginia's approved State plan.

We strongly disagree with WVDE's implication that we did not make any effort to obtain input from a key WVDE official. When we first notified WVDE of this audit, we asked that it designate an official to act as a liaison during the audit. The liaison's main responsibilities were to help us identify WVDE employees knowledgeable about the audit subject matter, schedule interviews with those employees, and facilitate our requests for information. At no point during the audit or in any written communications did WVDE provide us with the names of key WVDE employees who were absent during our site visit or subsequent meetings and who could provide relevant information. If

there were additional WVDE employees with relevant information, WVDE should have identified them during the audit or, at a minimum, shared our observation reports with those employees so they could provide written feedback on our findings.

Appendix A. Scope and Methodology

Our audit covered WVDE's procedures for implementing selected components of West Virginia's statewide accountability system based on performance level ratings that WVDE assigned to schools for school year 2021–2022. The three selected components were (1) indicators used to measure student academic achievement and school success, (2) annual meaningful differentiation, and (3) identification of schools needing additional support. Our audit also covered the additional funding and support services that WVDE provided to LEAs with schools identified in the fall of 2022 as needing CSI or CSI-ATS.

To achieve our objective, we first gained an understanding of Title I (including Part A) of the ESEA; Office of Elementary and Secondary Education letters waiving accountability requirements for school years 2019–2020 and 2020–2021 (March 27, 2020, and April 6, 2021); and "Standards for Internal Control in the Federal Government" (GAO-14-704G, September 2014).

To determine whether WVDE implemented the three selected components of West Virginia's statewide accountability system and provided additional funding and support services to schools identified for CSI or CSI-ATS, we reviewed

- West Virginia's approved State plan and amendments,
- WVDE's Methodology Guide,
- WVDE's calculations of the indicators used to measure student academic achievement and school success and its assignment of performance level ratings in the fall of 2022,
- a list of West Virginia public schools that WVDE identified in the fall of 2022 as needing additional support based on their assigned performance level ratings for school year 2021–2022,
- reports on the Title I set-aside funds that WVDE provided to eligible LEAs with schools identified in the fall of 2022 as needing CSI or CSI-ATS,
- WVDE's written plans that describe the 3-year process to support CSI or CSI-ATS schools and list the additional support services that will be provided for the 3 school years following the fall 2022 identification, and
- records of planning and collaboration, diagnostic and monitoring activities, and technical assistance.

Sampling Methodology

WVDE provided us with a list of 646 West Virginia public schools that were operating during school year 2021–2022. We selected a nonstatistical random sample of 65 (10 percent) of those 646 schools to determine whether WVDE applied a system of annual meaningful differentiation in accordance with West Virginia’s approved State plan and amendments.

Additionally, WVDE provided us with a list of 76 West Virginia public schools that it identified for CSI (21 schools) or CSI-ATS (55 schools) in the fall of 2022 based on the performance level ratings that it assigned for school year 2021–2022. We selected a nonstatistical stratified random sample of 10 (13 percent)⁹ of those 76 schools to determine whether WVDE used funds reserved under section 1003 of the ESEA to provide additional support services to West Virginia public schools identified as needing additional support.

We designed our sampling plan and chose our sample sizes specifically to accomplish our audit objective. Because our samples were not large enough to project the results with the precision required by our policy, the results of our samples cannot be projected to the entire population of West Virginia public schools that WVDE identified for additional support.

Analysis Techniques

We interviewed WVDE employees to gain an understanding of the procedures used to implement West Virginia’s statewide accountability system. We also compared the procedures outlined in WVDE’s Methodology Guide to the statewide accountability system described in West Virginia’s approved State plan and amendments. We discussed any differences with WVDE officials. Additionally, we analyzed WVDE’s records relevant to implementing three of the five components of the statewide accountability system (indicators of student academic achievement and school success, annual meaningful differentiation, and identification of schools needing CSI, CSI-ATS, and ATSI) to ensure that WVDE implemented the components as described.

⁹ Five (24 percent) of the 21 schools identified for CSI and 5 (9 percent) of the 55 schools identified for CSI-ATS.

Indicators Used to Measure Student Academic Achievement and School Success

We compared the indicators in WVDE’s Methodology Guide to West Virginia’s approved State plan to ensure that the indicators in the guide matched the indicators in the plan. We also compared the indicators that WVDE used to assign performance level ratings to the indicators in the plan. We concluded that WVDE implemented the indicators used to measure student academic achievement and school success in accordance with the plan if the indicators that WVDE used to assign performance level ratings matched those in the plan.

System of Annual Meaningful Differentiation

We calculated indicator scores for each indicator and student subgroup for the 65 West Virginia public schools included in our sample following the procedures described in WVDE’s Methodology Guide. We compared the indicator scores that we calculated to the indicator scores that WVDE calculated. We concluded that WVDE calculated indicator scores for each school in accordance with the Methodology Guide if the indicator scores that we calculated matched WVDE’s calculations.

Identification of Schools Needing CSI, CSI-ATS, and ATSI

We created a list of West Virginia public schools that WVDE should have identified for CSI, CSI-ATS, and ATSI following the procedures for assigning performance level ratings and identifying schools as needing additional support described in West Virginia’s approved State plan. We then compared our list to the list of schools that WVDE identified as needing CSI, CSI-ATS, and ATSI in the fall of 2022. We concluded that WVDE identified schools for CSI, CSI-ATS, and ATSI in accordance with West Virginia’s approved State plan if the schools on our list matched the schools on WVDE’s list.

Procedures for Ensuring the Reliability of Data

We reviewed the procedures that WVDE designed to provide reasonable assurance that the data it used to implement West Virginia’s statewide accountability system were accurate and complete. Additionally, we reviewed the manuals and guidance that WVDE provided to LEAs to use in collecting and validating data entered in the statewide accountability system. We did not complete our own procedures to assess the reliability of all the data that WVDE used.

Use of Computer-Processed Data

We relied, in part, on a list of Title I schools that WVDE provided to us; WVDE’s “Balanced Scorecard” file, which listed all public schools in West Virginia and their student subgroups to which WVDE assigned performance level ratings; and WVDE’s

“22–23 and 23–24 School Improvement Allocations” file, which listed all schools receiving school improvement allocations during those 2 years. We used the lists and other data to determine whether WVDE implemented its procedures for identifying schools needing CSI, CSI-ATS, and ATSI; applying annual meaningful differentiation; and providing additional funding and support services to LEAs with schools based on their CSI or CSI-ATS designations in accordance with West Virginia’s approved State plan and amendments, Methodology Guide, and funding methodology.

To assess the reliability of WVDE’s list of Title I schools and school information in WVDE’s “Balanced Scorecard” file, we compared the public schools listed in these two documents to the public schools listed in the National Center for Education Statistics’ data file for West Virginia. To assess the reliability of WVDE’s “22–23 and 23–24 School Improvement Allocations” file, we compared the list of schools with school improvement allocations to the list of identified schools pulled from the WVDE website and the list of Title I schools. We concluded that WVDE’s list of Title I schools and “Balanced Scorecard” and “22–23 and 23–24 School Improvement Allocations” files were sufficiently reliable for the purposes of our audit.

Compliance with Auditing Standards

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We conducted our audit at WVDE’s office in Charleston, West Virginia, and our offices from September 2024 through May 2025. We discussed the results of our work with WVDE officials on May 21, 2025, and provided them with the draft of this report on July 21, 2025.

Appendix B. Acronyms and Abbreviations

ATSI	additional targeted support and improvement
COVID-19	Coronavirus Disease 2019
CSI	comprehensive support and improvement
CSI-ATS	comprehensive support and improvement-additional targeted support and improvement
Department	U.S. Department of Education
ELA	English language arts
ESEA	Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015
LEA	local educational agency
Methodology Guide	West Virginia Department of Education “West Virginia’s Statewide Accountability System Methodology”
TSI	targeted support and improvement
WVDE	West Virginia Department of Education

WVDE Comments



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wvde.us

August 28, 2025

Ben C. Sanders
Director, Elementary and Secondary Education Oversight Team
United States Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-1510

Dear Director Sanders:

WVDE submits the following comments for consideration by the U.S. Department of Education Office of Inspector General (OIG), based on the DRAFT REPORT of The West Virginia Department of Education's Implementation of Selected Components of West Virginia's Statewide Accountability System, dated July 21, 2025:

Finding 3

While WVDE agrees that in the fall of 2022 it identified 12 schools for ATSI that it should not have identified, WVDE disagrees with the following:

- A. Quote from Finding 3, page 12: "At the exit conference, the director of WVDE's Office of Data Analysis and Research told us that after we informed WVDE of the issue, WVDE made the necessary changes to correctly apply the minimum number of students per subgroup restriction." The director of WVDE's Office of Data Analysis and Research stated that WVDE was aware of the error shortly after the identifications were made in the Fall of 2022. WVDE has made the necessary adjustments for future identifications. WVDE asks that the verbiage indicating the error was found due to the OIG audit be adjusted to indicate WVDE was aware of the error and had already made the necessary adjustments.

WVDE is unable to verify when the identifications in error were communicated to LEAs and schools, as the former Assistant Superintendent of Federal Programs and Support, who would have been responsible for the notifications, has since retired.

Michele L. Blatt
State Superintendent of Schools

L. Paul Hardesty
President, West Virginia Board of Education

U.S. Department of Education
Office of Inspector General
ED-OIG/A24IL0200

- B. Quote from Finding 3, page 12: "The ineligible schools may have received valuable resources provided by LEAs for which they were not entitled and that could have benefited other schools in need of and eligible for additional support services."

The report states in the Audit Results section, page 6, "Neither the ESEA nor WVDE's State plan requires WVDE to provide additional funding or support services to LEAs with schools needing ATSI."

The report goes on to say in Finding 2, page 10: "Neither the ESEA nor WVDE's State plan requires WVDE to provide additional funding or support services to LEAs with schools identified as needing ATSI. According to WVDE, LEAs are responsible for providing additional support services to schools identified as needing ATSI."

WVDE provides support and technical assistance to LEAs and schools identified for ATSI on an as-requested basis. WVDE provides technical assistance to all LEAs and schools as requested, regardless of identification status. The burden of identifying specific needs and providing support to ATSI schools lies with the LEA and school.

As WVDE does not provide additional funding or supports specific to ATSI schools, WVDE does not track supports requested for schools identified in the ATSI category.

Because WVDE does not track requested supports at the SEA level for ATSI, there is also no mechanism in place to identify resources and supports that may or may not have been provided at the LEA level. WVDE respectfully requests that the language indicating schools "may have received valuable resources provided by LEAs for which they were not entitled and that could have benefited other schools in need of and eligible for additional support services" be removed, as this language is vague and arbitrary and not supported by evidence.

Finding 3 Recommendations Response:

3.1. WVDE stands ready to provide documentation that the minimum number of students per subgroup restriction has been correctly applied when it identifies schools for ATSI in the Fall of 2025, as the identification process has been adjusted, and 3.2. that the schools incorrectly identified in the Fall of 2022 have not been identified as CSI-ATS schools based on previous ATSI identification.

Finding 4

Finding 4, page 14 states "West Virginia's approved State plan identifies the required resources and support for LEAs with CSI schools." It further states, "WVDE developed written plans that describe the 3-year process to support LEAs with schools identified as needing CSI or CSI-ATS." Based on language in the report, WVDE is making the assumption that the *required resources* are referred to as WV's approved "State" plan and the *additional resources or additional support services* are in reference to WVDE developed "Written" plans in the text of the report.

- A. WVDE finds no indication in the report that documentation of *required resources*, per West Virginia's approved "State" plan were not provided to LEAs and schools. Therefore, it follows that identified CSI and CSI-ATS schools received all resources and supports that are *required* by the approved "State" plan.
- B. Finding 4 goes on to say: "The [written] plans, in part, list the additional support services that should be provided to LEAs with CSI and CSI-ATS schools during the 3 school years following the fall 2022 identification. This support should consist of planning and collaboration, diagnostic and monitoring activities, and technical assistance from WVDE."
WVDE believes this language represents a fundamental misunderstanding on the part of the audit team of the WVDE developed "Written" plans for CSI and CSI-ATS schools. The use of the verb "should" indicates an unwarranted criticism of the supports provided by WVDE. The audit team did not choose to use the verbs "shall" or "must," because the referenced "Written" supports were developed as an overview guide to school improvement based on WVDE's approved "State" plan, and therefore are not *required*.
- C. The purpose of the "Written" plans is to provide the SEA, LEA and school with an overview of checkpoints of successful progression through the respective CSI and CSI-ATS processes. At no time does WVDE indicate or message to LEAs and schools that these "Written" plans are comprehensive in nature or to be followed with precise adherence to the timelines or supports indicated in the "Written" plans. Each LEA and school has specific needs and concerns that might indicate to the WVDE school improvement team that differentiated supports for the LEA or school are necessary to make progress.

In some cases, resources or processes referenced in the "Written" plans were provided to LEAs and schools, but WVDE technical assistance was not required. Depending on the specific needs, LEAs or schools may require technical assistance virtually or on-site. For example, the WVDE-developed process for a school staff

debrief on the WV School Learning Environment Survey (WVSLES) may or may not be conducted in conjunction with a member of the WVDE school improvement team, based on the circumstances at the school. In addition, WVDE provided flexibility to LEAs who already used similar surveys in all of their schools. With WVDE approval, LEAs were permitted to utilize these surveys with identified schools, as this allows for a greater level of support from the LEA and a more robust set of historical data. Historical data provides both the LEA and the school with the ability to track trends and more effectively assess needs and next steps.

- D. Differentiated supports were warranted in schools whose records were requested by the audit team. These supports were identified internally by the WVDE school improvement team. WVDE can point to schools making progress that exceeded the supports indicated in the "Written" plan. WVDE began providing additional supports not listed in the "Written" CSI plan for schools as early as Fall 2022, providing specific training targeted to administrative and staff needs to accelerate student academic progress. Two such schools, for which records were requested, were identified because of their outstanding progress to participate in training with WVDE school improvement staff at Harvard University in December 2024.

Other schools were identified by the WVDE school improvement team as not progressing through the overview process at the rate necessary for improvement. One such school was identified for referral to the WVDE Office of Accountability for a Special Circumstance Review due to student safety concerns and was subject to action on these matters by the West Virginia Board of Education (WVBE). In this case, circumstances necessitated that differentiated supports be put in place to ensure student safety, which took priority over the additional supports in the "Written" plan. Diagnostic activities referenced in the audit report could be one such activity, as the Special Circumstance Review involves an on-site review based on the policies and procedures of the WVDE Office of Accountability.

Records as to these differentiated supports are kept and are available. WVDE further contends that the percentages indicated in the report, with 94% of requested records produced for CSI schools, indicate fidelity to the process on the part of WVDE staff and an indication of the effectiveness of the CSI overview "Written" plan, as only a small number of schools in the sample required differentiated technical assistance.

- E. WVDE also believes that the questioning of the retention of certain materials related to diagnostic reviews is unwarranted, such as specific notes of staff interviews at the LEA and school level. The audit team requested WVDE's records retention policy. The policy, which has not been revised in decades, was shared

with the audit team and does not address record retention with regard to school identification processes, as it predates these federal requirements.

Neither WVDE's approved "State" plan nor WVDE's supplemental "Written" plans address the retention of such documents. The Office of School Improvement follows the following procedures with regard to diagnostic record retention.

1. Diagnostic team members are provided with a list of questions for interviews and forms for classroom observations. Team members record their own notes during the diagnostic process, and these notes are shared throughout the development of the diagnostic review report. Team members from the LEA and school level are included in classroom observations.
2. Team members are provided opportunities to share and discuss evidence on the day of the on-site review.
3. Team members participate in a post-diagnostic work session within a few days of the on-site review, using procedures developed by WVDE school improvement staff known as "Affinity Mapping." During this process, team members summarize information collected during the on-site visit and develop patterns that are used as the basis for the diagnostic review report. Classroom observation forms completed by local team members are collected at the conclusion of the on-site visit and utilized during the work session.
4. At the conclusion of the work session, all team member notes are collected by the school improvement diagnostic review lead for reference as the report is developed.
5. Once the report is developed and goes through WVDE's internal review process, the school improvement diagnostic review lead conducts a work session with the LEA and school. At this time, the report remains in DRAFT, and additional local input and evidence are considered. Once all parties have had an opportunity for input, the DRAFT report is amended as needed and a FINAL report is shared.
6. WVDE retains all records from the on-site visit until the conclusion of this process. Due to storage concerns, these records are then destroyed. WVDE retains these records for reference until the FINAL version of the report is produced and all parties are satisfied that the FINAL Diagnostic Review Report accurately reflects the evidence collected.
7. The FINAL Diagnostic Review Report is retained and utilized by WVDE and the LEA and school to set goals and priorities and guide the school improvement process.

WVDE requests that any language in the report related to this type of record-keeping be removed or changed to reflect the affinity mapping process employed by the Office of School Improvement.

- F. WVDE believes it is important to note that the Director of the then "Office of School Improvement," as it stood in the Fall of 2022, was out of the country and unavailable during the audit team's September 2024 on-site visit. This individual was never interviewed by the audit team, nor was any effort made to obtain input from the director.
- G. WVDE requests that Finding 4 be removed due to evidence that WVDE's "State" plan was followed and that WVDE's developed "Written" plans are intended as an overview, which provides checkpoints that may assist in the school improvement process, but not as an indication that each school will receive the same additional supports. WVDE further requests this finding be removed as the Office of School Improvement followed its own policy with regard to record retention.

If the finding remains, WVDE requests that it be presented with alternate language as a positive finding, indicating the fidelity to the "State" and "Written" processes on the part of WVDE, including flexibility and differentiated plans for schools that either fall behind or excel, with additional supports and technical assistance provided based on LEA and school-specific needs.

Finding 4 Recommendations Response:

Shortly after the on-site portion of the audit in September 2024, the former Assistant Superintendent of the Division of Federal Programs and Support retired. Additionally, the consolidation of WVDE offices occurred, resulting in a division now encompassing both the Office of ESEA, Improvement and Support and the Office of Special Education. The new Assistant Superintendent has been working to align the work of the division, and has developed an internal school improvement team, made up of individuals from the Office of ESEA, Improvement and Support and the Office of Special Education, with members from other WVDE divisions as well.

This internal team has worked to develop consistent processes for CSI and CSI-ATS schools, and beginning with school identification in fall of 2025, will produce one CSI list which includes the specific reason(s) for each school's identification.

- A. With regard to 4.1, WVDE will continue to keep records indicating all *required* supports per West Virginia's approved "State" plan are provided to LEAs and schools. WVDE will further include language on any *additional* developed "Written"

plans, indicating the nature of the plan is meant to be an overview guide for improvement processes at the LEA and school level. WVDE will continue to provide differentiated supports based on specific LEA and school needs as identified by WVDE processes, on-site visits, and local-level needs assessments.

Additional Language

WVDE also respectively requests the following:

Results in Brief

- A. Under "What Did the OIG Find?" WVDE requests the language "Additionally, WVDE did not always keep records showing that it provided additional support services, such as planning and collaboration, diagnostic and monitoring activities, and technical assistance, to LEAs and schools identified as needing additional support (Finding 4)" be removed based on the evidence submitted regarding Finding 4.
- B. Under "What is the Impact?" Based on evidence submitted regarding Finding 4, WVDE believes "stakeholders do not have sufficient assurances that WVDE is providing LEAs and schools with all the planning and collaboration, diagnostic and monitoring activities, and technical assistance they need to improve their students' academic performance" be removed.
- C. Under "What Are the Next Steps?" Based on evidence submitted regarding Finding 4, WVDE disagrees with the language "additional support services that it promised the LEAs and schools" and requests the language be removed. The word "promised" is contrary to the intent of the WVDE developed 3-year "Written" plans.

Introduction

- A. Under "Statewide Accountability System" page 4, WVDE requests that the language "and list the additional support services to be provided to those schools for the three school years following the fall 2022 identification" be removed as the words "to be provided" are contrary to the intent of the WVDE developed 3-year "Written" plans.

Audit Results

- A. WVDE requests the last sentence of number 4, "However, WVDE did not always keep records showing that it provided the additional support services to schools identified as needing CSI or CSI-ATS in the fall of 2022 (Finding 4)" be removed.

United States Department of Education
Office of Inspector General
August 28, 2025

Finding 1

The first paragraph of Finding 1, page 7 states: "We identified a small number of exceptions related to WVDE's identification of additional schools for ATSI and retention of additional support service records, and discuss that information in Findings 3 and 4, respectively." WVDE requests the language "and retention of additional support services records" and "and 4, respectively" be removed based on the evidence submitted for Finding 4.

Additional Language

- A. WVDE requests the removal of any additional language in the report referencing the concerns WVDE has put forth.

Sincerely,



Michele L. Blatt
West Virginia Superintendent of Schools