



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF VOCATIONAL AND ADULT EDUCATION

OCT 18 2010

Dr. Kathy Shibley
State Director
Ohio Department of Education
Career-Technical and Adult Education
25 S. Front Street Mail Stop 602
Columbus, Ohio 43215-4183

Dear Dr. Shibley:

Enclosed is the final report for the March 15-19, 2010, on-site monitoring visit, conducted by the U. S. Department of Education (Education), Office of Vocational and Adult Education (OVAE), Division of Academic and Technical Education (DATE), pursuant to the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins, Perkins IV, or the Act). The purpose of this visit was to assess the degree to which the Ohio Department of Education (ODE), which is the agency designated by the Ohio State Board of Education (the sole State agency) to administer its Perkins grants, is meeting the requirements of Perkins IV. We hope that, as a result of this visit, your State will identify ways to improve its Perkins administration, implementation, and accountability systems.

The monitoring team identified two (2) findings where the ODE is not meeting the requirements of Perkins IV. These findings are found within the "Program Finance" and "Local Applications" sections of the report. Applicable sections of Perkins IV are cited for each finding along with corrective actions the ODE must take to achieve compliance with Perkins IV.

The monitoring team also identified improvement strategies within specific sections of the report as possible approaches for your State to strengthen its Perkins administration, implementation, and accountability systems. We encourage you to implement these strategies although you are not required to do so.

Thank you for a productive visit and your willingness to discuss strategies to prepare all career and technical education students in Ohio for a successful future. Our office is committed to providing the ODE with technical assistance to maintain compliance with Perkins IV.

Sincerely,

Sharon Lee Miller, Director
Division of Academic and Technical Education

Enclosure

**FINAL REPORT:
State of Ohio's Compliance with the
Career and Technical Education Improvement Act of 2006 (Perkins IV)**

Overview

The U. S. Department of Education (Department), Office of Vocational and Adult Education (OVAE), Division of Academic and Technical Education (DATE), conducted an on-site monitoring review to the Ohio Department of Education (ODE) on March 15-19, 2010, pursuant to the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins, Perkins IV, or the Act). The purpose of this visit was to assess the degree to which the ODE, which is the agency designated by the Ohio State Board of Education (the sole State agency) to administer its Perkins grants, is meeting the requirements of Perkins IV.

The monitoring team identified two (2) findings where the ODE is not meeting the requirements of Perkins IV. These findings are found within the "Program Finance" and "Local Applications" sections of the report. Applicable sections of Perkins IV are cited for each finding along with corrective actions the ODE must take to achieve compliance with Perkins IV. Also identified within specific sections of the report are suggested improvement strategies for your State to strengthen its Perkins administration, implementation, and accountability systems. We encourage you to implement these strategies although you are not required to do so.

Monitoring Team Members

Name	Area of Review
Allison Hill*	State Administration; Tech Prep Programs
Andrew Johnson	Fiscal Program Responsibility
Len Lintner	Local Applications
Margaret Romer	Programs of Study
Marie Buker	Accountability; Special Populations
* Monitoring Team Lead	

Areas of Review

A. State Program Administration

Current Status:

The Ohio State Board of Education is the eligible agency responsible for the oversight of the State's Perkins grants. The Office of Career-Technical Education within the Ohio Department of Education (ODE), in consultation with the Ohio State Board of Regents, is responsible for the overall administration of the Perkins grants at both secondary and postsecondary levels.

Career and technical education programs at the secondary level are offered through 91 career technical planning districts (CTPDs) each comprising three types: a single city district; a

compact of several individual school districts; and a joint vocational school (JVS) serving several member districts.

Career and technical education programs at the postsecondary level are offered through 22 community colleges and four-year colleges that offer two-year career and technical education programs, and five consortia. Services also are provided for adult students at the 91 CTPDs.

The State Board of Education's vision is for all Ohio students to graduate from the PK-12 education system with the knowledge, skills and behaviors necessary to successfully continue their education and/or be workforce ready and successfully participate in the global economy as productive citizens. To graduate all students well prepared for success, the State Board is focusing on the following objectives:

1. Teaching 21st century knowledge and skills for real-world success;
2. Effectively delivering support for a high quality education;
3. Providing sufficient resources which are efficiently managed; and
4. Developing a statewide outreach and communication strategy on board policy and the importance of education in the 21st century.

Career and technical education in Ohio plays a key role in achieving these objectives. Through the collaborative efforts of the ODE and Ohio Board of Regents, Ohio seeks to establish clear standards for college readiness, help high schools students aspire and prepare for college, combine high school completion and college readiness courses for learners not completing high school, and improve teacher education.

To this end, the ODE has thorough policies and procedures for coordinating the development, submission, and implementation of its Perkins IV Five-Year State Plan (State plan), as well as policies and procedures for undertaking the career and technical education program, services, and activities contained therein. The ODE maintains a collaborative working relationship with the Ohio Board of Regents and other agencies listed in section 121(a)(2) of Perkins IV. One example of this coordination is the ODE's current efforts to host an Economic Education Summit that will focus on business, industry, and education collaboration and seek to identify and/or develop best practices that can be replicated throughout the State's career and technical education delivery system.

The ODE uses its Title I State leadership funds to meet the required activities in section 124(b) of Perkins IV. Notable activities include non-traditional programming with a focus on student performance; training and professional development, particularly in the areas of STEM (Science, Technology, Engineering, and Math) program implementation; the expansion of programs of study; and the development of industry-validated content standards.

The ODE provides extensive technical assistance to its local recipients. The ODE maintains a local monitoring guide that describes a four-step monitoring process: an initial self-assessment, a desk audit, a telephone audit, and an on-site review. Each year, the ODE uses one or more of these processes to assess the needs of each local recipient. The monitoring process also includes

a compliance review to assure a local recipient's compliance with civil rights laws. Upon request, the ODE offers technical assistance to any local recipient.

Findings:

No findings were noted.

Suggested Improvement Strategies:

No strategies were noted.

B. Program Finance

Current Status:

For program year (PY) 2009-2010, beginning on July 1, 2009, the ODE received Perkins IV Title I basic grant award totaling \$45,028,414. The ODE also received a Perkins IV Title II tech prep education grant award totaling \$4,446,194, which the State opted not consolidate with its Title I funds under the authority of section 202(b) of Perkins IV.

The ODE targeted five percent of its Title I funds for State administration activities and ten percent for State leadership. From its State leadership funds, the ODE allotted \$75,000 for non-traditional activities and \$450,284.14 for State institutions. The remaining 85 percent of the Title I funds were allocated to secondary and postsecondary recipients, with 79 percent of these funds slated for the secondary level. The ODE does not presently use reserve authority available under section 112(c) of Perkins IV.

The ODE currently uses an accounting system that has a built-in first-in/first-out (FIFO) payment system, thereby ensuring that older Perkins IV grant funds are obligated and liquidated prior to more recent funds. Additionally, the ODE has an effective system in place to reconcile expenditures reported on its financial status reports (FSRs) to general accounting ledgers maintained by the ODE. The ODE submits to our office, in a timely fashion, financial status reports that are consistent with fiscal data contained in general accounting ledgers.

The ODE has established an appropriate system for the proper allocation of grant funds to secondary sub-recipients by addressing the required formula outlined in section 131 of Perkins IV.

The ODE has made a concerted effort to reduce the level of carryover by expending a substantial portion of its section 112(a)(1) flow-through funds during the first twelve months of grant availability.

Findings:

Finding: The ODE did not properly allocate its FY 2009 Title I funds to postsecondary recipients pursuant to Perkins IV and applicable Department regulations.

Evidence: This determination was made after reviewing documentation and interviewing fiscal and program staff at the ODE. It was revealed that for the Perkins IV Title I grant award beginning on July 1, 2009, the ODE created two separate funding pools to award subgrants to postsecondary eligible institutions. The first funding pool was allocated to community and technical colleges in the amount of \$4,212,161.54, while a second funding pool was allocated to career technical planning districts (CTPDs) that serve adults in the amount of \$3,829,237.76. This process, referred to as “pooling by type of institution or activity,” is not allowable under Perkins IV and the Education Department General Administrative Regulations (EDGAR).

Relevant Sections of the Legislation: Sections 132(a)(2) and (b) of Perkins IV and EDGAR at §34 CFR 403.118(c)(4).

Corrective Actions Required: The ODE must develop policies and procedures to ensure that all eligible postsecondary institutions are run through the same formula and that each eligible institution receives the correct proportional share of the Perkins IV Title I allocation. Assuming that the ODE used this same method to award its FY 2010 funds to postsecondary recipients, the ODE may need to re-run its postsecondary allocation formula and amend its postsecondary subgrants. The ODE must provide documentation of these actions as soon as possible, but no later than November 15, 2010.

Suggested Improvement Strategies:

Strategy #1: The ODE should consider adopting policies and procedures to ensure that a higher percentage of its Title I State administration and leadership funds are obligated and liquidated in the first year of grant award availability. This would reduce the likelihood of grant funds lapsing and being returned to the Federal government.

C. Local Applications

Current Status:

The ODE administers local application processes that are designed to meet the intent of the Federal legislation, facilitate local planning, provide direction in the use of Federal funds for career and technical education, and, with one exception noted below, document how applicants meet the assurances specified in Perkins IV. The ODE has developed generally thorough processes to review and evaluate all local applications, with particular attention given to low-performing eligible recipients that need to achieve better performance results.

To facilitate its local application process, the ODE has developed the Ohio Comprehensive Continuous Improvement Plan (CCIP), an on-line grants management system consisting of an application, a budget, and a planning tool. The planning tool serves as an electronic approval system for local five-year and yearly renewal plans. Local recipients provide a narrative description of program goals, strategies, and action steps that will be employed and must ensure that expenditures align with ODE’s vision for career and technical education (see section D of this report). The approval process for applications is comprehensive, emphasizing the

establishment of performance indicators and ensuring that local plans support quality assurance goals established by the ODE.

Findings:

Finding: The ODE's postsecondary local application failed to include an assurance that eligible recipients will operate programs of sufficient size, scope, and quality as required under Perkins IV.

Evidence: This determination was made after reviewing documentation and conferring with appropriate program staff. Moreover, it was noted that the ODE and Ohio Board of Regents have not established clear standards for size, scope, and quality for postsecondary applicants.

Relevant Sections of the Legislation: Section 134(b)(6) of Perkins IV.

Corrective Action Required: The ODE, in collaboration with the Ohio Board of Regents, must revise its postsecondary local application to require an assurance from eligible recipients that they will operate programs of sufficient size, scope, and quality. To this end, the ODE, in collaboration with the Ohio Board of Regents, should establish a definition of size, scope and quality (see suggested strategy #3 below). The revised postsecondary local application and definition must be submitted to OVAE for approval as soon as possible, but no later than November 30, 2010.

Note: It is our understanding that ODE and Ohio Board of Regents are currently working to correct this finding and are in communication with appropriate DATE staff for assistance as needed.

Suggested Improvement Strategies:

Strategy #1: The ODE may consider ways to exert stronger State leadership for the use of Perkins funding by local recipients. For example, the ODE could require eligible recipients to address particular needs by expending a percentage of its grant award in certain areas, such as guidance or special populations. Conversely, the ODE could limit the level of program expenditures by placing a ceiling on certain allowable costs, such as equipment or supplies. From a statewide perspective, the flexibility to use funding floors and ceilings should be predicated on annual performance data and the desire to strengthen local programs, services, and activities.

Strategy #2: The ODE should continually revisit the potential benefits of the reserve fund permitted under section 112 of Perkins IV. These funds could be effectively targeted in ways not readily available to the State as it distributes Title I funds under sections 131 and 132 of Perkins IV. For example, the ODE could focus these reserve funds for a very narrow set of priorities to address the needs of special populations or target funds to particular program areas in need of enhancement throughout the State.

Strategy #3: The ODE may consider refining its definition of size, scope, and quality for approved programs, services, and activities, with strong consideration given to crafting the “quality” element in terms of performance criteria that are now part of the State’s accountability system. In addition, “size” could be predicated on a minimum student participation level, while “scope” could be tied more closely to programs of study.

Strategy #4: The ODE may consider revising its local budget matrix with purpose codes that reflect the required and permissive uses of funds in section 135 of Perkins IV. This revised matrix may generate better financial data to support the ODE’s goals for career and technical education program of study.

D. Tech-Prep

Current Status:

The State’s vision for career and technical education is actually “Tech Prep for All.” The ODE, in collaboration with the Ohio Board of Regents, has established an ambitious goal that by 2014 all State-approved secondary career and technical education programs will transition to tech prep standards and use State-approved programs of study as the primary mechanism to develop secondary-to-postsecondary pathways. To this end, the ODE maintains a strong network of 23 tech prep consortia, which are funded annually through a State-administered formula.

The ODE recognizes a “College Tech Prep” program that stresses student success and workforce development. The curriculum focuses on Science, Technology, Engineering, and Math (STEM) careers integrated with core academic skills. Tech prep programs offer open-entry for all secondary students and exit criteria indicate student college and career readiness.

An approved career and technical education/tech prep program of study includes access to opportunities for students to earn postsecondary credit for coursework taken during high school through one or more of the following options: career-technical credit transfer (CT2); Transfer Assurance Guides (TAGS); Advanced Placement (AP); Stackable Certificates; Postsecondary Enrollment Options (PSEO); dual or concurrent enrollment programs; and bilateral agreement for articulated credit with postsecondary partners. College credit for postsecondary courses taken while in high school transfer to any other two- or four-year institution in the State that offers a career and technical education/tech prep program of study.

Findings:

No findings were noted.

Suggested Improvement Strategies:

No strategies were noted.

E. Programs of Study

Current Status:

The Ohio General Assembly, the Ohio Board of Regents, the ODE, and Ohio's universities and community and technical colleges are working together to support the transition of secondary students to postsecondary career and technical education and have a strong legislation foundation upon which to collaborate. Ohio Revised Code Section 3333.16 requires that the Ohio Board of Regents, in consultation with the ODE, public adult and secondary career-technical education institutions, and State institutions of higher education establish criteria, policies, and procedures that enable students to transfer agreed-upon technical courses, completed through a public secondary career-technical institution, adult career-technical education institution, or a State institution of higher education, to a State institution of higher education without unnecessary duplication or institutional barriers. The courses to which these criteria, policies, and procedures apply are those that adhere to industry-recognized standards and equivalent coursework common to the secondary career pathway, adult career-technical education system, and regionally-accredited State institutions of higher education. Where applicable, the policies and procedures build upon articulation agreements and the transfer initiative course equivalency system required by section 3333.16 of the Revised Code.

The Ohio State Board of Education has adopted resolutions to assure that each school district provide career and technical education programs adequate to prepare a student for an occupation. The ODE maintains the “Ohio 16 Career Field Technical Content Standards” and has developed the Ohio Competency Articulation and Sequencing Tool (OCAST), which is an on-line, searchable database that assists instructors and staff to use technical competencies to create programs of study, courses of study, lesson plans, and articulation agreements. The OCAST links to the State-legislated articulation initiative, Career-Technical Credit Transfer (CT2)—an initiative which facilitates statewide credit transfer among public high school career and technical, adult workforce, and college/university education.

In implementing its programs of study (POS) pursuant to Perkins IV, the ODE employs a State approval process with specified criteria. A local recipient may adopt a State-developed POS or may develop and submit its own POS for State approval. Local POS are subject to review and monitoring by the State and require renewed approval every five years.

Beginning as part of the ODE’s local application for FY 2009, each local recipient is required to complete and submit a State-approved POS template addressing the requirements of Perkins IV and including the following four additional requirements:

- Written articulation agreements that establish and validate a career pathway must be in place for each POS.
- All articulation agreements must be signed and approved by the agency head of each participating secondary and postsecondary recipients.

- A POS must include a locally-endorsed sequence of core academic and career and technical education courses from Grade 9 through the postsecondary component of the POS.
- Each POS is expected to be guided by the workforce and economic development needs of business/industry, the community, and employment opportunities for students.

The ODE has a plan that will ensure that 100 percent of State-approved secondary career and technical education programs have a State-approved POS by FY 2014. Postsecondary recipients will be required to develop, review, and/or revise POS in collaboration with their secondary partner(s) following the same schedule as their secondary counterparts.

The ODE consults and collaborates with local recipients in the development of POS by widely vetting the State criteria in the Perkins planning process and disseminating the criteria through State websites and statewide meetings and conferences. In addition, the ODE provides technical assistance and professional development to eligible recipients on an as-needed basis as they develop local POS. Finally, POS approved by the ODE are disseminated through State websites to enable eligible recipients to learn and borrow from each other as appropriate.

Findings:

No findings were noted.

Suggested Improvement Strategies:

Strategy #1: The ODE may consider completing the newly-developed Program of Study Self-Assessment that is now available on the Department’s Perkins Collaborative Resource Network at <http://cte.ed.gov/docs/POSLocalImplementationTool-9-14-10.pdf>. This tool could help the ODE to identify areas of strength and challenge in reaching its ambitious 2014 goal for POS and helping the State to direct its limited resources accordingly.

F. Accountability

Current Status:

As of its latest Consolidated Annual Report (CAR), covering PY 2008-2009, the ODE exceeded all but one of its State-adjusted levels of performance for the section 113 core indicators. The only shortfall was for adult student placement (4A1), but the shortfall was within the 90% threshold allowable under Perkins IV. This result made the ODE one of only 25 States that met or performed within the 90% threshold range on all their negotiated performance levels and the State was not required to implement a program improvement plan pursuant to section 123 of Perkins IV.

**Table of Performance Levels and Actual Performance
Program Year 2008-2009**

Indicator Code	Indicator	Grand Total Student Numerator	Grand Total Student Denominator	Grand Total Target Performance	Grand Total Actual Performance
Secondary					
1S1	Academic Attainment Reading/Language Arts	25,235	27,043	87.00%	93.31%
1S2	Academic Attainment Mathematics	24,794	27,043	83.00%	91.68%
2S1	Technical Skill Attainment	5,216	8,197	61.00%	63.63%
3S1	Secondary School Completion	26,967	28,247	93.00%	95.47%
4S1	Student Graduation Rate	25,787	27,251	73.60%	94.63%
5S1	Student Placement (postsecondary, military, employment)	22,839	25,809	87.00%	88.49%
6S1	Nontraditional Participation	23,934	89,752	20.00%	26.67%
6S2	Nontraditional Completion	5,382	23,593	17.00%	22.81%
Postsecondary					
1P1	Technical Skill Attainment	16,580	21,819	74.00%	75.99%
2P1	Credential, Certificate, or Degree	9,434	21,819	37.00%	43.24%
3P1	Student Retention or Transfer	42,405	64,224	66.00%	66.03%
4P1	Student Placement (apprenticeship, employment, military)	7,547	9,434	79.00%	80.00%
5P1	Nontraditional Participation	17,026	77,458	11.50%	21.98%
5P2	Nontraditional Completion	2,035	10,415	10.50%	19.54%
Adult					
1A1	Technical Skill Attainment	5,919	6,468	90.62%	91.51%
2A1	Credential, Certificate, or Degree	5,662	8,210	66.00%	68.96%
3A1	Student Retention or Transfer	3,707	4,468	75.50%	82.97%
4A1	Student Placement (apprenticeship, employment, military)	5,494	6,353	93.80%	86.48%
5A1	Nontraditional Participation	1,202	11,607	9.62%	10.36%
5A2	Nontraditional Completion	579	6,051	8.92%	9.57%

The ODE's student definitions and measurement approaches for the core indicators conform to OVAE's March 13, 2007, non-regulatory guidance. Notably, the State is using technical skill assessments to measure student's technical skill proficiency (one of the most challenging, but important measures for States at the secondary level) and continues to implement its plan for

increasing the coverage of programs and students who take the State's technical skill assessments and are included in the measure.

The ODE places high priority on data accuracy, completeness, and reliability through its Education Management Information System (EMIS), which is the State's secondary data collection and reporting system. The ODE accountability staff produces reports that are used by districts to monitor school data for accuracy and completeness. The accountability staff is now producing webinar training sessions on each report. These sessions guide districts in how best to use these reports to check data, as well as analyze data to make informed program decisions.

The Higher Education Information System (HEI) collects and provides postsecondary data under the direction of the Ohio Board of Regents. Adult Workforce Education (AWE) produces reporting data from information submitted through the Adult Workforce Education Data System. Excellent coordination and communication exists between these agencies as evidenced in their common processes and forms for monitoring, technical assistance, and comprehensive continuous improvement. Secondary, postsecondary, and adult programs provide performance data on their Perkins sub-recipients down to the institution/district/career center levels and makes data available on its websites for public information and review.

The ODE has used its website for information dissemination, as well as for providing technical assistance and professional development opportunities to its eligible recipients. The "Elluminate" system is being used by the ODE as a platform for meetings, trainings, and presentations on initiatives such as tracking student success, improving follow-up (i.e., technical assistance on improving placement results), performance level negotiations, Perkins monitoring in-service, and nontraditional participation and completion. "Elluminate" has been well-received by the field for its efficiency and flexibility in accommodating scheduling conflicts. The Ohio Board of Regents also has begun to use this system for meetings and presentations.

Findings:

No findings were noted.

Suggested Improvement Strategies:

Strategy #1: The Ohio Board of Regents may consider possible alternative approaches for the collection of data on students with disabilities in a fashion similar to its collection of displaced homemaker data as reported in the Free Application for Federal Student Aid (FAFSA). The Ohio Board of Regents may wish to investigate additional data collection methods such as gathering data through student services departments or through the Americans with Disabilities Act (ADA).

Strategy #2: The new Performance Improvement Process (PIP) was impressive as a combined monitoring and technical assistance approach to districts that are required to develop an improvement plan as required by section 123 of Perkins IV. The ODE may consider using the Administrative Field Service staff to lead the discussion in the initial call to districts as it pertains to reviewing data for those indicators requiring an improvement plan. This may give staff the

opportunity to provide technical assistance in data analysis, if needed, in order for districts to develop performance improvement plans that require the approval of the ODE.

G. Special Populations

Current Status:

The ODE places high priority on meeting the needs of the special populations served in career and technical education. The ODE has developed a framework for transition services for special populations and has secured full-time positions for a statewide career assessment specialist and job training coordinator.

The ODE Perkins IV State Plan addresses interagency collaboration and the expectation of special populations' success in academic and skill attainment. Student services and initiatives presented in local five year plans and annual applications show evidence of services designed to assist these students in furthering learning, meeting State-adjusted performance levels, and preparing for high skill, high wage, and high demand occupations. The ODE's local application requires applicants to address barriers that impede special populations from meeting performance indicators and allows these students to prepare for high skill, high wage, and high demand occupations.

The ODE provides ongoing technical assistance, monitoring, and professional development to administrators and teachers to ensure equal accessibility, non-discriminatory practices, and program success for members of special populations in career and technical education programs, including correctional facilities for juveniles and adults. Noteworthy among the ODE's efforts include its participation in the National Alliance for Partnerships in Equity (NAPE), its "Hard-Hatted Women" initiative and "MAC Project" and its joint project with the Office for Exceptional Children and Kent State University to collect, manage, and report data on the post school engagement of students with disabilities in postsecondary education and employment.

Notwithstanding the programmatic efforts being made to address the needs of special populations enrolled in Ohio's career and technical education delivery system, disaggregated data for special populations and race/ethnicity categories from the ODE's most recent FY 2008-09 CAR reveal a number significant issues.

Compared to State-adjusted performance levels (targets) for all students, secondary students with disabilities achieve 22-26% percent below performance levels for English/language arts, math, and technical skills, while secondary students with limited English proficiency achieved 47% below the targeted level for technical skill attainment. Postsecondary students with limited English proficiency fell over 16% below the target for placement in employment.

At the adult level, students with disabilities were 25% below the target for placement, while non-traditional students were nearly 73% below the target for placement. Adult single parents were 43% below the target level for non-traditional participation, and 89% below the non-traditional completion target. Similarly, displaced homemakers were 47% below the target for non-traditional participation, and 54% below the target for non-traditional completion. Finally, non-

traditional students achieved 91% below targets for both technical skill attainment and credential attainment; moreover, these students also were 73% below the target level for placement.

A review of race/ethnicity disaggregated data reveals that secondary Hispanic students were 24% below the target level for technical skill attainment. Postsecondary Black students achieved at a rate 21% below the target level for technical skill attainment, and 26% below the target for credential attainment. Postsecondary retention rates for adult Native American, Black, and Hispanic students ranged from 18% to 34% below the target level.

Findings:

No findings were noted.

Suggested Improvement Strategies:

Strategy #1: The ODE and the Ohio Board of Regents should consider ways to target programs, services, and activities to address the above-noted shortfalls for disaggregated student populations. The State may direct its leadership funds or make use of its reserve funds to address these performance shortfalls. Also, revised local applications can be used encourage local initiatives to address the affected populations highlighted in the consolidated annual report.