
IMPROVING TITLE I DATA INTEGRITY FOR SCHOOLS IDENTIFIED FOR IMPROVEMENT



FINAL AUDIT REPORT Control Number ED-OIG/A03-B0025 March 2002

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U.S. Department of Education
Office of Inspector General
Philadelphia, Pennsylvania

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Statements that management practices need improvement, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General. Determinations of corrective action to be taken will be made by appropriate Department of Education officials.

In accordance with the Freedom of Information Act (5 U.S.C. §552), reports issued by the Office of Inspector General are available, if requested, to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF INSPECTOR GENERAL

MEMORANDUM

MAR 27 2002

TO: Susan B. Neuman
Assistant Secretary
Office of Elementary and Secondary Education
[REDACTED]

FROM: Thomas A. Carter
Assistant Inspector General for Audit

SUBJECT: FINAL AUDIT REPORT
Improving Title I Data Integrity for Schools Identified for Improvement
Control No. ED-OIG/A03-B0025

Attached is our subject final report that covers the results of our review of management controls over Title I, Part A performance data concerning schools identified for improvement at the Office of Elementary and Secondary Education and the Planning and Evaluation Service, Office of the Under Secretary for school years 1997-98, 1998-99 and 1999-2000. We reviewed your comments concurring with the findings and recommendations in our draft audit report.

You have been designated as the primary action official for this report. The Under Secretary is the collateral action official. Please coordinate with him regarding any action in connection with recommendations.

Please provide the Supervisor, Post Audit Group, Office of Chief Financial Officer and the Office of Inspector General with quarterly status reports on promised corrective action until all such actions have been completed or continued follow-up is unnecessary.

In accordance with the Freedom of Information Act (5 U.S.C. §552), reports issued by the Office of Inspector General are available, if requested, to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.

We appreciate the cooperation given us in the review. Should you have any questions concerning this report, please call Bernard Tadley, Regional Inspector General for Audit at (215) 656-6279.

Attachment

cc: Joseph Johnson, Director, Compensatory Education Programs



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF INSPECTOR GENERAL

MEMORANDUM

MAR 27 2002

TO: Eugene W. Hickok
Under Secretary
Office of the Under Secretary
[REDACTED]

FROM: Thomas A. Carter
Assistant Inspector General for Audit

SUBJECT: FINAL AUDIT REPORT
Improving Title I Data Integrity for Schools Identified for Improvement
Control No. ED-OIG/A03-B0025

Attached is our subject final report that covers the results of our review of management controls over Title I, Part A performance data concerning schools identified for improvement at the Office of Elementary and Secondary Education (OESE) and the Planning and Evaluation Service, Office of the Under Secretary for school years 1997-98, 1998-99 and 1999-2000. We reviewed your comments concurring with the findings and recommendations in our draft audit report.

You have been designated as the collateral action official for this report. The Assistant Secretary for OESE has been assigned as the primary action official. Please coordinate with her regarding any action in connection with recommendations.

Please provide the Supervisor, Post Audit Group, Office of Chief Financial Officer and the Office of Inspector General with quarterly status reports on promised corrective action until all such actions have been completed or continued follow-up is unnecessary.

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Attachment

cc: Alan L. Ginsburg, Director, Planning and Evaluation Service
Hugh Walkup, Director, Planning and Policy Services

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Executive Summary

The purpose of this review was to assess whether the U. S. Department of Education (the Department) has management controls to ensure that Title I, Part A performance data concerning schools identified for improvement (i.e., schools that fail to meet State criteria for adequate yearly progress) was reliable, valid, and timely. Local Educational Agencies (LEA) were required to review the progress of each Title I school to determine whether the school was making adequate yearly progress. Schools that did not make adequate progress for two consecutive years were to be identified by LEAs for improvement. LEAs reported this information to State Educational Agencies (SEA), which in turn reported the data to the Department. The Office of Elementary and Secondary Education (OESE) and the Planning and Evaluation Service (PES), Office of the Under Secretary (OUS) have responsibility for management controls over school improvement data reported by SEAs.

While the Department had a process in place to collect and publish the Title I States' school improvement performance data, it needs to strengthen management controls over this process. The Department needs to take steps to improve its management controls over school improvement data to ensure that the data are reliable, valid, and timely. Specifically, our audit disclosed that:

- Management controls over the timely publication of school improvement data need to be strengthened; and
- Department needs stronger management controls to ensure that Title I school improvement data are reliable and valid.

The No Child Left Behind Act of 2001, Public Law 107-110, enacted January 8, 2002, places even more emphasis on the accountability for results and defines consequences for schools that do not make adequate yearly progress. We recommend that the Assistant Secretary for OESE and the Under Secretary take steps to improve management controls over the timeliness, reliability and validity of the data.

OUS and OESE generally concurred with our findings and recommendations. A complete copy of their joint response is included as an attachment to the report.

Background

The Title I, Part A program was enacted under the Elementary and Secondary Education Act (ESEA), as amended by the Improving America's Schools Act of 1994, Public Law 103-382. The 1994 reauthorization of the ESEA introduced standards-driven reform. Specifically, Title I services were to be linked to the same State content and performance standards that were expected of all children, and aligned assessments were to be used to measure students' progress toward meeting those standards. In addition, States were required to put in place a system of accountability designed to identify and assist schools that did not make adequate yearly progress toward meeting the standards. LEA were required to annually review the progress of each Title I school to determine whether the school was making adequate yearly progress. Schools that did not make adequate progress for two consecutive years were to be identified for improvement.

In fiscal year 2000, the Department awarded approximately \$8 billion in ESEA Title I funds. Title I, Part A provides financial assistance through SEA's to LEA's and schools to help meet the educational needs of children who were failing, or most at risk of failing, to meet challenging State academic standards, and who resided in areas with high concentrations of children from low-income families.

By the 1997-98 school year, each State was to develop challenging content (i.e., reading and math) and student performance standards. According to OESE program officials, 51 States and jurisdictions (out of 52) had approved content standards by February 2002, and 28 States and jurisdictions had performance standards for all required grade spans by February 2002. By the 2000-2001 school year, States were to have in place, assessments that were aligned with these standards and procedures for holding schools accountable for the results. A status report as of September 19, 2001, disclosed that only 16 States had approved assessment systems, of the remaining 36 States and territories, 28 had received a waiver, and eight had not complied with the law. SEAs were required to take corrective actions to improve low performing schools and districts whose students failed to make adequate yearly progress toward meeting the challenging State standards.

To meet its administrative responsibilities and report performance information to Congress, the Department required States to submit annual performance data. The reporting instrument, *Consolidated State Performance Report*, required all States to provide data under eight formula grant programs. The Department required States to submit the reports by December 1. The report reflected data for the previous school year (for example, the December 1, 1999, report covered school year July 1, 1998- June 30, 1999).

OESE administers the Title I program of the Elementary and Secondary Education Act. The administration of the program included the collection, review and monitoring of the performance information provided by States. PES helps guide the Title I program priorities by evaluating the effectiveness, efficiency, and equity of the programs. OESE and PES have a shared responsibility for school improvement data reported by SEAs.

The Department hired a contractor to analyze and edit, as appropriate, the participation, services, and achievement data from the Title I portion of the *Consolidated State Performance Report*. The contractor consolidated the analysis of the States' data into the *State ESEA Title I Participation Information Summary Report*. This report provided the scope of the Title I program services for two successive school years. The data was aggregated by States and by several aspects of the Title I program including the number of school districts, schools and students served, range of instruction and support services provided, Title I staffing patterns, and schools meeting the adequate yearly progress requirement.

The No Child Left Behind Act of 2001, enacted January 8, 2002, reauthorized the ESEA. The Act strengthens Title I accountability by requiring States to implement statewide accountability systems covering all public schools and students. These systems must be based on challenging State standards. School districts that do not make adequate yearly progress toward statewide proficiency goals will over time be subject to improvement, corrective action, and restructuring measures aimed at getting them back on course to meet State standards.

Audit Results

The Department had a process in place to collect and publish the Title I States' school improvement data. However, the Department needs to strengthen management controls over the process. The Department's management controls did not ensure that school improvement data provided by States was reliable, valid, and timely. Specifically, our audit disclosed that (1) management controls over the timely publication of school improvement data need to be strengthened, and (2) Department needs stronger management controls to ensure that Title I school improvement data are reliable and valid.

Finding No. 1 – Management Controls Over the Timely Publication of School Improvement Data Need to be Strengthened

Management controls were not adequate to ensure the timely receipt, review, and publication of school improvement data. As a result, the Department has not published the *State ESEA Title I Participation Information Summary Report* in a timely manner. This report contains performance data on schools identified for improvement. Based on our review of the 2000 (1997-1998 data) and 2001 (1998-1999 data) reports, we determined that the Department published those reports approximately 22 months after the data was due from the States. Not publishing information timely can cause it to lose its usefulness. The newly enacted No Child Left Behind Act of 2001 places an even greater emphasis on the importance and timeliness of this data, because it defines consequences for schools that do not make adequate yearly progress.

The general instructions in the Department's *Consolidated State Performance Report* required that all States, whether or not they receive funding on the basis of consolidated State plans, must respond. Each State report was due December 1 of each year and

reflected data for the previous school year (for example, the December 1, 1999 report covered school year July 1, 1998- June 30, 1999). This information was needed by the Department to meet its administrative responsibilities.¹

To ensure that performance data were of the highest quality, the Department adopted Data Quality Standards² for Department of Education program managers. One of these standards required that data be reported as soon as possible after collection. Specifically, *Standard Five: Timeliness* requires data to be recent and reported in time to inform policy action.

Management controls over the timely collection of Title I performance data need improvement

OESE did not have adequate controls to ensure that program officials’ followed-up with States that did not submit Title I performance data on time. Based on our review of the Title I data collection process for three years (school years (SY) 1997-98, 1998-99, and 1999-00), OESE did not have a systematic process for follow-up with States that were late in submitting data. The OESE program officials noted that they generally contacted State officials by telephone and did not keep consistent records of these contacts. For the most recent year (SY 1999-00), OESE program staff advised us that actions on late submission of data from States were not initiated until three months after the due date.

OESE initiated the use of a log to record the receipt and status of State consolidated reports for SY 1998-1999. A review of the log for the reports due on December 1, 1999, disclosed the following:

	School Year 1998-1999				Total Reported
Number of Consolidated State Performance Reports	4	17	16	15	52 ³

¹ The Department provides information to Congress, including that under the Government Performance Results Act (GPRA) of 1993 and congressional mandates for the national assessment of ESEA, Title I (section 1501), and evaluation of the federal impact on reform (ESEA, Title XIV, section 14701) contained in the 1994 reauthorization of the ESEA.

² Subsequent to the publication of the *1999 Performance Reports and 2001 [Annual] Plans* in March 2000, ED revised the *Data Quality Standards* by increasing the number of standards from six to eight. In March 2001, ED published the revised standards as *Draft Data Quality Standards* in its *2000 Performance Report and 2002 Annual Plans*. For the purpose of this audit, we used the March 2000 standards that were in effect during our audit period.

The subsequent year's log (SY 1999-2000) was not complete. Therefore, we could not determine the extent of late submissions.

In addition to late submissions from States, the Department's contractor informed us that for SY 1998-1999, approximately 40 States were requested to revise their initial data submission because of conditions identified during the edit check process. Also, one State did not finalize its data submission until two weeks before the SY 1998-1999 report was published in October 2001, because the largest LEA in the State was late in submitting its data to the State.

Our review disclosed that OESE's management controls did not ensure timely follow-up of late submissions because OESE did not have a systematic process. Specifically, (1) there were no time frames established for obtaining late data submissions, (2) OESE program officials did not enforce the submission deadline (i.e., December 1) with clear and frequent reminders, and (3) no action was taken against States that repeatedly submitted data late or States that were non-responsive.

Management controls over the timely review of Title I performance data need improvement

OESE and PES need to strengthen controls to ensure timely review and publication of school improvement data. Specifically, the review process on the various drafts of the report were not performed concurrently and time frames were not established by the Department to ensure the timely publication of the *State ESEA Title I Participation Information Summary Report*.

The recently enacted No Child Left Behind Act of 2001 has raised the level of importance of performance data on schools identified for improvement. The new law emphasizes accountability for results and consequences for schools that do not meet goals once identified for improvement. The new law requires annual report cards from LEAs and SEAs on achievement indicators, including school improvement data. Further, the law includes a requirement for the Department to report achievement results to Congress. Since these submissions will affect future program decisions, and will be the basis of information reported to Congress, the Department needs to strengthen its controls for ensuring that the submissions and subsequent reporting of the data are timely.

Recommendation:

1.1 The Assistant Secretary for Elementary and Secondary Education and the Under Secretary should strengthen management controls to ensure the timely receipt, review and publication of performance data concerning schools identified for improvement.

³ The State of Alaska, for unknown reasons, was left off the log, reducing the number of entities to 52.

Auditee's Comments:

OUS and OESE generally concurred with the finding and recommendation. They informed us that they have revised the report review process and currently use a process that includes concurrent reviews by reviewing offices. In addition, OUS and OESE are working on developing more efficient follow-up procedures. For the most recent draft report (1999-2000 school year data), they stated that OESE called States earlier and as a result, received data more quickly; and they expect to publish the 1999-2000 report this spring. The Department plans to provide technical assistance to States on implementing the new reporting requirements of No Child Left Behind Act. They believe that this assistance will also expedite the collection and reporting of State data as well as improve its quality.

Finding No. 2 – Department Needs Stronger Management Controls to Ensure that Title I School Improvement Data are Reliable and Valid

The Department needs to strengthen its process for ensuring that Title I school improvement data are reliable and valid. The Department relied on a contractor to perform edit checks on the school improvement data prior to its publication. This edit check process involved reviewing the data for anomalies, providing States with edit check reports, making telephone contacts with the submitters of the data, and responding to changes made by States. Our audit work concerning school improvement data in a large State determined that the edit check process alone was not adequate to ensure that the published school improvement data submitted by the State was reliable and valid.

The Department's Data Quality Standards⁴ require that performance data be valid and accurate. Specifically:

Standard One: Validity - requires that the data adequately represents performance and that performance indicators actually measure the goal or objective of interest.

Standard Two: Accurate - data are based upon correct counts, agreed-upon definitions and the phenomena being measured occurred or existed at the time for which they were reported.

⁴ In March 2000, ED published *Data Quality Standards* to assist its internal managers as they collect, analyze, and report data about Federal programs, including Title I, Part A. OIG used these standards to evaluate the California Department of Education's management controls over data quality. The OIG has suggested that ED distribute the standards to States to help ensure they provide reliable, valid, and timely performance data to ED for such programs as Title I (OIG Information Memorandum - State and Local No. 01-01, dated August 3, 2001, titled *State-Reported Data Used in Measuring Performance of Education Programs*). While ED has not yet distributed the standards to States, the *Data Quality Standards* are accessible on the Department's Web site.

The contractor and OESE staff advised us that they were unable to check the accuracy of the Title I performance data without requesting supporting documentation from States. We were advised that the supporting documentation maintained by States was not collected because it would have required Office of Management and Budget approval. We also found that the OESE has not requested or reviewed school improvement data during State monitoring visits to ensure that data was reliable and valid. The OESE advised us that they will be piloting an achievement focused monitoring process, during fiscal year 2002. The monitoring visits will be based on a performance matrix and school improvement data will be reviewed during those visits.

Monitoring Data

Monitoring of school improvement data can identify weaknesses in a State's data controls. For example, an OIG audit of California Department of Education (CDE) performance data disclosed that CDE reported inaccurate school improvement data to the Department. The audit identified weaknesses in management controls in the reporting of school improvement data. Specifically, CDE did not:

- report schools that were previously identified for improvement;
- document its data collection process or retain supporting documentation; and
- review the reported data for reliability.

While these conditions were found during an audit, they could have been identified during an OESE monitoring visit, if the visit included procedures to review data maintained to support a State's submission of school improvement data.

Validation Controls are Needed

In addition to weak controls over the validation of school improvement data, the Department did not require States to validate the performance data submitted to the Department, such as having the appropriate State official attest that the data reported for the *Consolidated State Performance Report* was valid, and reliable. Without the appropriate State official attesting to the validity of the data submitted, the Department lacked additional assurance that the data adequately represented performance.

The Single Audit Act of 1984 established requirements for audits of States, local governments and Indian tribal governments that administer Federal financial assistance programs. The Compliance Supplement provides guidance to assist auditors in determining compliance requirements relevant to the audit, audit objectives and suggested audit procedures. The Department has not included the area of school improvement data controls in the Compliance Supplement used for conducting audits at SEAs and LEAs under the Single Audit Act.

On August 3, 2001, the Office of the Inspector General (OIG) issued an information memorandum to the Under Secretary informing him of action that the Department could take to increase its assurance that States provide reliable data for use in GPRA reports. The OIG suggested that the Department:

- Distribute the Department's Draft *Data Quality Standards* to SEAs and encourage SEAs to provide the standards to LEAs located in their State.
- Include in the *Compliance Supplement* audit coverage of data used for performance indicators because SEA and LEA reviews of the data are limited and may not ensure that the data are reliable.

Implementation of the suggestions in the memorandum will also provide the Department managers with increased assurances that the SEA and their LEAs school improvement data are reliable. The Department is currently reviewing the memorandum.

The recently passed No Child Left Behind Act of 2001 strengthens the accountability for results and defines consequences for schools that do not make adequate yearly progress, increases the importance of the data and the need for the Department to have assurances that school improvement data are reliable and valid. Improving management controls over the school improvement data and implementation of the suggestions in the OIG memo to the Under Secretary will provide added assurances to Department managers.

Recommendations: The Assistant Secretary for Elementary and Secondary Education and the Under Secretary should:

- 2.1 Develop and implement written procedures to assess, during monitoring visits to SEAs and LEAs, whether school improvement data are reliable and valid.
- 2.2 Distribute the Department's Data Quality Standards to SEAs and encourage SEAs to provide the standards to LEAs for their use.
- 2.3 Include audit procedures in the *OMB Compliance Supplement* to review controls over Title I, Part A school improvement data at LEAs and SEAs during annual Single Audits.

Auditee's Comments:

OUS and OESE generally concurred with the finding and recommendations. OESE plans to develop written procedures to assess the reliability and validity of school improvement data during monitoring visits to States. Further, OESE hopes to improve the quality of Federal data, as well as minimize burden on States by implementing a performance-based data management initiative.

Other Matters

We reviewed the *State ESEA Title I Participation Information for 1997-98 and 1998-1999 Final Summary Reports*. Our review found that, while an explanation was made regarding the impact that changes in a State's assessment system could have on the data, the reports did not identify the States that changed their assessment systems. A change in a State's assessment system used to measure schools' performance may impact the number of schools identified as in need of improvement. As a result, year to year comparisons of the data, without adequate disclosure of a change in the State's assessment system could lead a reader or decision maker to draw incorrect conclusions or question the validity and reliability of the data. We suggest that PES identify in the report the States that change assessment system from one period to the next.

Auditee's Comments:

PES plans to note significant changes in these areas so that readers will have more complete information as they review the school improvement data.

Objective, Scope and Methodology

The purpose of our audit was to determine whether the U. S. Department of Education has management controls in place to ensure that Title I, Part A performance data concerning schools identified for improvement (i.e. schools that fail to meet State criteria for adequate yearly progress) was reliable, valid, and timely.⁵

Our audit period covered Title I, Part A data concerning schools identified for improvement for the 1998-1999 school year (July 1, 1998 - June 30, 1999). Because the work indicated weaknesses in the management controls outside the audit period, we extended our review to include school years 1997-1998 and 1999-2000.

To accomplish our audit objective, we conducted interviews and reviewed available documentation in the OESE, PES, and the Department's contractor. The contractor performs an analysis of the State's data and prepares the *State ESEA Title I Participation Information Summary Report*. We also tested the accuracy and completeness of the published data by comparing the State's data with any changes and reconciling it to what was published. We did not rely on computer-processed data in this audit. The

⁵ This audit was conducted as part of a joint project of the U. S. Comptroller General's Domestic Working Group to determine whether data used for the purpose of the Government Performance and Results Act of 1993 (GPRA) for the Title I program are reliable, valid, and timely. The participants in the joint effort are the U. S. General Accounting Office (GAO), U. S. Department of Education's Office of Inspector General (OIG), Texas State Auditor's Office, Pennsylvania Auditor General's Office, and the Philadelphia City Controller's Office.

Department's data collection and review process was not automated. The Department's contractor captures and edits the data on a personal computer Access database program.

From the universe of 53 reporting entities (50 States, District of Columbia, Puerto Rico and Bureau of Indian Affairs), we stratified the States into large, medium, and small based on the reported number of schools identified for improvement in the Title I reports issued October 2001, for school years (SY) 1997-1998 and 1998-1999. We judgmentally selected 10 (three large, four medium, and three small) Title I reports for each year under review.

We reviewed the Department's GPRA report, FY 2000 Interim Program Performance Reports and FY 2002 Program Plans, to determine whether the Department had indicators related to Title I. We found that the Department established 11 performance indicators for Title I grants to schools serving at-risk children. Two of the 11 indicators used the annual Title I State performance report as a data source. The other Title I indicators used various studies from the National Longitudinal Study of Schools, Public School Survey on Education Reform, National Assessment of Education Progress and Title I peer review records

We conducted our fieldwork at OESE and PES offices in Washington, DC, and the contractor's office in Rockville, Maryland, during the period September 23, 2001, through December 7, 2001. We held an exit conference with OESE Title I and PES officials on December 11, 2001. We conducted the audit in accordance with government auditing standards appropriate to the scope of review described above.

Statement on Management Controls

We have made a study and evaluation of the management control structure of OESE, PES and the Department's contractor in effect during our fieldwork. Our study and evaluation was conducted in accordance with Government Auditing Standards. For the purposes of this report, we assessed and classified the significant management controls structure into the following categories:

- Process for receipt and follow-up of States' Title I performance data;
- Data review and edit process; and
- Reporting of Title I performance data.

The management of OESE and PES are responsible for establishing and maintaining a management control structure. In fulfilling this responsibility, estimates and judgment by management are required to assess the expected benefits and related cost of control procedures. The objectives of the management control structure are to provide management with reasonable, but not absolute, assurance that assets are safeguarded against loss from unauthorized use or disposition and that the transactions are executed in accordance with management's authorization and recorded properly, so as to permit effective and efficient operations.

Because of inherent limitations in any management control structure, errors or irregularities may occur and not be detected. Also, projection of any evaluation of the system to future periods is subject to the risk that procedures may become inadequate because of changes in conditions, or that the degree of compliance with the procedures may deteriorate.

Our assessment disclosed the following conditions in management control structure of OESE, and PES in effect during our fieldwork, which, in our opinion, results in more than a relatively low risk that errors or irregularities in amounts that would be material in relation to reported information may occur and not be detected within a timely period:

- Management controls over the timely publication of school improvement data need to be strengthened; and
- Department's controls to validate Title I performance data are not adequate.

These conditions and their effects are fully discussed in the Audit Results section of this report.



UNITED STATES DEPARTMENT OF EDUCATION

THE UNDER SECRETARY

MEMORANDUM

TO: Bernard Tadley
Regional Inspector General for Audit

FROM: Dr. Eugene Hückok [REDACTED]

DATE: March 18, 2002

SUBJECT: *Improving Title I Data Integrity for Schools Identified for Improvement*
Control No. ED-OIG/A03-B0025

Thank you for providing OUS and OESE the opportunity to comment on the draft *Improving Title I Data Integrity for Schools Identified for Improvement* report. Our comments follow:

- The *Background* section of the report notes that OESE officials report that all States have met the requirement to have content and performance standards in place by the 1997-98 school year. This is not accurate. Though required by 1997 – 1998, 51 States and jurisdictions (out of 52) had approved content standards by February 2002, and 28 States and jurisdictions had performance standards for all required grade spans by February 2002.
- In the second to last paragraph of the *Background* section, we suggest you note that the data reported in the Title I Participation report are aggregated for each State and not broken out for each school and district. Also, the last sentence indicates that the report includes “school progress toward meeting content standards.” This is not quite correct. States establish content standards but are not required to report on school progress toward meeting those standards. Rather, the States report on schools meeting adequate yearly progress requirements.
- Finding #1 notes that ED did not publish the State ESEA Title I Participation Information Summary Report in a timely manner for the 1997-98 and 1998-99 reporting years and goes on to discuss a key reason for report delays. On this issue we would like to make the following points. The vast majority of States were late in turning in their consolidated State performance reports, making it impossible to analyze and summarize the data earlier. In addition, as noted in the report, we asked 40 States to revise their initial data submissions because of problems identified during the edit-check process. We agree that OESE has not had a systematic process in place for following up with late States. OESE will implement additional procedures to ensure such follow-up with future submissions. In addition, OESE plans to use its Title I monitors and State contacts to monitor progress on report submissions and work with States on data quality issues as part of the monitoring process. In so doing, not only should the reports be submitted earlier, but there should be less follow-up needed once the data are submitted.

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Page 2 – Bernard Tadley

PES is working closely with OESE on developing more efficient follow-up procedures for States that have not responded to data problems. For the most recent draft report (1999-2000 school year data), OESE called several States earlier in the edit-check process and as a result, we received corrected data more quickly. We expect to publish the 1999-2000 report this spring, well ahead of the last two years' reports. The Department also plans to provide technical assistance to States on implementing the new reporting requirements of the No Child Left Behind Act. We believe this assistance will expedite the collection and reporting of State data as well as improve its quality.

- Finding #1 also states that OESE and PES need to strengthen controls to ensure timely review and publication of school improvement data, building in more concurrent reviews of the report by the reviewing offices. This statement might be misdirected. We do use a review process that includes concurrent reviews by reviewing offices. The main problem is the late data and the late responses to problems identified in the edit checks.
- Finding #2 notes that ED needs to strengthen its process for ensuring that Title I school improvement data are reliable and valid. The report correctly points out that ED's current review of the school improvement data involves edit checks to review the data for anomalies, rather than a more in-depth process for documenting reliability and validity. ED has not collected documentation from States on their data, as such a collection would require Office of Management and Budget approval, as discussed in the report. However, as suggested in the report, OESE does plan to build in more attention to Title I data submitted for the performance report as part of regular monitoring visits to States. OESE plans to develop written procedures to assess the reliability and validity of school improvement data during monitoring visits.

Another way we hope to improve the quality of Federal data as well as minimize burden on States is by implementing a performance-based data management initiative. We will work with States to build and publish data standards, including consensus data elements and definitions. We expect to publish our data quality standards again in the GPRA report due to Congress on March 29.

- The report also recommends that PES identify (in the summary report) the States that have changed assessment systems in recent years, so that readers will better understand some of the fluctuations in school improvement numbers. Given the new accountability and assessment requirements in the No Child Left Behind Act, most States will be changing their assessment systems as well as their definitions of adequate yearly progress. We will note significant changes in these areas so that readers will have more complete information as they review the school improvement data.

cc: Susan Neuman
Joseph Johnson
Alan Ginsburg
Richard Rasa
Hugh Walkup

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