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OFFICE OF INSPECTOR GENERAL

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Kathy Cox
State Superintendent of Schools
Georgia Department of Education
2066 Twin Towers East
Atlanta, GA 30334

Dear Ms. Cox:

This **Final Audit Report**, entitled *Review of the Georgia Reading First Program*, presents the results of our audit. The purpose of the audit was to determine whether the Georgia Department of Education (GDOE) (1) developed and used criteria for selecting the scientifically based reading research (SBRR) programs in accordance with the law and regulations; and (2) approved the local education agencies' (LEA) applications in accordance with the law and regulations. Our audit covered the period May 1, 2002, through September 30, 2005.

BACKGROUND

The Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001, signed into law on January 8, 2002, established the Reading First program. Reading First is a focused nationwide effort to enable all students to become successful early readers. The program significantly increased the assistance to state educational agencies (SEA) and LEAs to ensure that every student can read at grade level or above no later than the end of grade three. Funds are dedicated to help states and local school districts eliminate the reading deficit by establishing high-quality, comprehensive reading instruction in kindergarten through grade three. The program is designed to select, implement, and provide professional development for teachers using SBRR programs;¹ and to ensure accountability through ongoing, valid and reliable screening, diagnostic, and classroom-based assessment. The total appropriations for the Reading First Program for fiscal years 2002, 2003, and 2004 were \$900 million, \$993.5 million, and \$1.024 billion, respectively. SEAs can receive funds for a six-year period. SEAs award subgrants to LEAs on the basis of a competitive process.

¹ Scientifically Based Reading Research is defined as research that applies rigorous, systematic, and objective procedures to obtain valid knowledge relevant to reading development, reading instruction, and reading difficulties; and includes research that employs systematic, empirical methods that draw on observation or experiment; involves rigorous data analyses that are adequate to test the stated hypotheses and justify the general conclusions drawn; relies on measurements or observational methods that provide valid data across evaluators and observers and across multiple measurements and observations; and has been accepted by a peer-reviewed journal or approved by a panel of independent experts through a comparably rigorous, objective, and scientific review.

GDOE's grant application was approved by the U.S. Department of Education (Department) in September 2003. GDOE awarded the subgrants during two grant award periods (Cohorts). Cohort 1 included fiscal years 2002, 2003, and 2004; and Cohort 2 included fiscal years 2005, 2006, and 2007. The Department's Office of Elementary and Secondary Education (OESE), awarded GDOE about \$90.8 million in Reading First funds during the audit period. Of the \$90.8 million awarded to GDOE during Cohort 1, \$72.2 million was allocated to 38 LEAs and 97 schools in five rounds of LEA grant application reviews.

In developing its application, GDOE used the review of scientifically based research on reading instruction contained in the National Reading Panel's "Teaching Children to Read" report (2000) as a guide for establishing its Reading First program. In its approved application, GDOE also addressed the five essential components of an effective reading program and required LEAs and schools to include these components in their reading programs. These five components are the five components defining the term "essential components of reading instruction" in Section 1208(3) of the ESEA. During Cohort 1, GDOE required LEAs and schools to use *A Consumer's Guide to Evaluating a Core Reading Program-Grades K-3: A Critical Elements Analysis* (Consumer's Guide) to evaluate instructional materials and reading programs for SBRR.

GDOE's approved Reading First application set forth the subgrant approval process. GDOE used contracted grant reviewers to review and score LEA grant applications. However, GDOE made the actual decision on whether or not to recommend the LEAs for funding. The reviewers were tasked with determining whether applications addressed the criteria listed in scoring rubrics designed by GDOE. LEAs were also given an extra 5 priority points if they were below the poverty level for the state each year. After all applications were reviewed and scored, GDOE recommended funding for LEAs and schools that received a total combined minimum passing score of 60 points or greater. The State Board of Education approved GDOE's recommendations and the LEAs were awarded funding.

AUDIT RESULTS

GDOE generally developed and used criteria for selecting the SBRR programs in accordance with the law as interpreted by the Department.² However, GDOE did not have formal written policies and procedures in place for administering the program. As a result, GDOE did not provide adequate guidance to ensure that its staff, subgrantees, and contracted grant reviewers complied with applicable Reading First program law, regulations,³ and its approved grant application requirements during the LEA grant application process. GDOE should develop and follow policies and procedures to administer the program, and it should follow up during and after the grant review processes to ensure program compliance.

² The Department's interpretation of SBRR is under review in another OIG audit conducted by our Region III office in Philadelphia.

³ Regarding regulations, we are referring to the Education Department General Administrative Regulations (EDGAR) applicable to the Reading First program.

In its December 7, 2006, comments to the draft report, GDOE partially concurred with our finding and concurred with our recommendation. The comments are summarized at the end of the finding. The full text of GDOE's comments on the draft report is included as an Attachment to the report.

FINDING – GDOE Did Not Have Written Policies and Procedures and Did Not Adequately Manage the LEA Grant Application Process

GDOE did not have written policies and procedures in place and did not adequately manage several areas of the LEA grant application process. As a result of not having policies and procedures, the following conditions occurred that affected the grant application process:

- GDOE added a requirement for LEAs' selection of SBRR programs that was not approved by the Department;
- There was no assurance that grant reviewer qualifications met experience requirements;
- Contract requirements for grant reviewers were not enforced;
- Adequate guidance was not provided to grant reviewers and grant reviewers' comments were not reviewed; and
- LEA private school consultation was not verified or documented.

We found that GDOE's policies and procedures for implementing the Reading First program were primarily based on the memory of the Reading First staff and were not always consistently applied. In response to our request for internal policies and procedures, one of GDOE's Reading First program coordinators stated, "we have a variety of guidance documents, training materials, and other documents that are a part of policies and procedures. They are not put together in one formal policies and procedures manual." The Reading First Program Manager left GDOE on June 30, 2006, and one of the program coordinators that assisted with determining the LEAs and schools to be funded also left. As a result, some Reading First program knowledge may have been lost when key Reading First staff members left GDOE. Also, the potential exists for inconsistencies in GDOE's management of the application process and administration of the program.

EDGAR, 34 C.F.R. § 76.770⁴ provides that "Each State shall have procedures for reviewing and approving applications for subgrants and amendments to those applications, for providing technical assistance, for evaluating projects, and for performing other administrative responsibilities the State has determined are necessary to ensure compliance with applicable statutes and regulations."

Furthermore, EDGAR, 34 C.F.R. § 80.40(a) states that grantees are responsible for managing the day-to-day operations of grant and subgrant supported activities. Grantees must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Grantee monitoring must cover each program, function or activity.

⁴ All regulatory citations are as of July 1, 2005, and the regulations in EDGAR applied during the entire audit period.

GDOE stated in its approved grant application that it would manage and monitor the grant to assure compliance with applicable federal requirements. However, without written policies and procedures in place for performing administrative responsibilities, GDOE did not effectively manage and monitor its Reading First program as evidenced by the issues discussed below. GDOE needs to have written policies and procedures to ensure that its staff, subgrantees, and contracted grant reviewers are fully knowledgeable of and comply with applicable Reading First program law, regulations, and its approved grant application, while administering the program.

GDOE Added a Requirement for LEAs' Selection of SBRR Programs that Was Not Approved by the Department

The Department issued *Guidance for the Reading First Program, April 2002*, that states the SEA must describe, in its application to the Department, its process and selection criteria and how it will ensure that the instructional materials, programs, strategies and approaches are based on SBRR. In its grant application, GDOE stated that LEAs and schools were required to use the Consumer's Guide to evaluate instructional materials and reading programs for SBRR. Guidance provided by GDOE to the LEAs and grant reviewers stated that a reading program could be used if it was evaluated using the Consumer's Guide.

After the Department approved the state grant application, GDOE added a requirement for the LEAs' selection of SBRR programs. If an LEA chose to use a reading program that had not been previously reviewed by the University of Oregon or the Eastern Regional Reading First Technical Assistance Center (ERRFTAC),⁵ the vendor was required to submit the program for review to the ERRFTAC before the LEA purchased the materials. GDOE required a vendor to wait until after the ERRFTAC review was conducted before an LEA could use the vendor's program. The vendor subsequently filed a complaint about the ERRFTAC requirement and GDOE removed the requirement. The ERRFTAC review requirement was in place for approximately two months before GDOE removed the requirement. According to the vendor that complained about the requirement, the ERRFTAC reviewed the vendor's program for four weeks before the requirement was removed. Once the ERRFTAC requirement was removed, the vendor requested that the ERRFTAC review be halted. Subsequently, an LEA used the vendor's program.

GDOE issued a retraction letter dated May 11, 2004, stating that the ERRFTAC review of reading materials was no longer required, but schools needed to "thoroughly evaluate the materials for purchase internally to determine the materials' usefulness to your comprehensive reading programs within your Reading First schools. Further, it is important to ensure that the materials you purchase are scientifically research based. Any materials that meet these requirements are eligible for purchase with federal Reading First funds."

GDOE's Reading First Program Manager stated that he made the ERRFTAC review requirement known to grant applicants verbally and that the review seemed to be a good idea at the time. The

⁵ The U.S. Department of Education awarded a five-year contract to establish the National Center for *Reading First* Technical Assistance (NCRFTA). The National Center consists of three regional centers located at The University of Oregon, The University of Texas, and Florida State University (ERRFTAC). ERRFTAC provides services to 17 states and 2 territories that have received *Reading First* grants. ERRFTAC conducts scientifically based research in reading; uses high quality research methods to generate specific knowledge to more effectively teach all children to read well by third grade; disseminates research based information about reading assessment and instruction to districts, schools, and teachers; and provides leadership to guide the implementation of *Reading First* Grants.

idea was for the schools to complete their own review in order to compare it against a review completed by someone else with more expertise. In response to the issue, GDOE officials stated, “this was not an ‘additional requirement,’ but rather, a requirement that the Reading First Program Manager thought was required under the federal grant.” This is an example where formal written policies and procedures for administering the program could have prevented the misunderstanding of program requirements by program managers. In addition, it created the appearance of unfair treatment for some vendors to have to undergo additional requirements.

There Was No Assurance that Grant Reviewer Qualifications Met Experience Requirements

GDOE did not ensure that its contracted grant reviewers met the qualifications listed in the Request for Quotation (RFQ) used to hire the grant reviewers. In its approved grant application, GDOE stated, “Reviewers of the Reading First applications for LEAs will be individuals recognized within the national research community as experts in SBRR.” Our review of grant reviewers’ qualifications identified that 16 of the 30 grant reviewers did not mention SBRR in their resume. Contrary to its approved grant application, GDOE did not require the LEA grant application reviewers to demonstrate their knowledge of SBRR in their resumes. By not following this grant application requirement, GDOE did not follow prudent hiring practices to ensure that it hired the most qualified grant reviewers to review LEA and school grant applications.

EDGAR, 34 C.F.R. § 76.700, entitled "Compliance with statutes, regulations, State plan and applications," states that "A State and a subgrantee shall comply with the State plan and applicable statutes, regulations, and approved applications, and shall use Federal funds in accordance with those statutes, regulations, plan, and applications."

GDOE’s RFQ requested each grant reviewer applicant to provide qualifications that would demonstrate the reviewer’s experience, education, or abilities in reviewing Reading First grant applications. We reviewed the information on qualifications provided in resumes (in response to the RFQ) for the 30 grant reviewers that GDOE hired to review LEA and school grant applications. We noted that grant reviewers did not provide the requested information:

- Two (7 percent) did not have their doctoral degree or were not candidates for the degree.
- Two (7 percent) did not mention elementary education experience.
- 16 (53 percent) did not mention SBRR in their resume.
- 23 (77 percent) did not list their experience using the Consumer's Guide in their resume.

The GDOE official responsible for overseeing the contracting of the grant reviewers stated that GDOE did not have time to verify all of the qualifications of grant application reviewers. The official stated GDOE only verified whether the grant reviewer applicants were employed as they stated in their resumes. GDOE’s Reading First Program Manager also stated it was not necessary to verify grant reviewer qualifications because GDOE knew many of the reviewers and their reputations.

In regard to the RFQ, GDOE officials stated that the only “absolute” requirement in the RFQ was that the grant application reviewers have a doctoral degree or at least be a doctoral candidate. All other qualifications mentioned in the RFQ were desired, not required, qualifications, and the candidates that had the most qualifications were chosen. However, as

identified above, of the 30 grant reviewers contracted by GDOE, we found that two (7 percent) of the 30 grant reviewers did not meet this “absolute” requirement. In addition, one of the desired qualifications was experience using the Consumer’s Guide, but most grant reviewers did not list any experience using the Consumer’s Guide in their resumes. We concluded that the grant reviewer contract process was not carried out in a manner that would ensure that most grant reviewers possessed desired qualifications to review LEA and school Reading First applications. As a result, GDOE could not provide assurance that the best qualified grant reviewers or “experts in SBRR” reviewed applications.

GDOE should have a written policy so that the Reading First staff performing the contracting process will ensure that the best-qualified reviewers are hired. GDOE needs to use grant reviewers that possess required and desired qualifications to help ensure that the LEAs and schools’ plans for a reading program are being adequately reviewed in accordance with program requirements.

Contract Requirements for Grant Reviewers Were Not Enforced

We identified a contracted grant reviewer who reviewed applications for LEAs and schools that were using a reading program authored by the grant reviewer⁶. In his resume submitted to GDOE, the grant reviewer indicated that he authored a reading program, but GDOE did not ensure that the contracted grant reviewer recused himself from reviewing the applications of LEAs that selected the reading program he authored. GDOE assigned him to review the applications for LEAs and schools that used his program, as well as competing programs.

We reviewed the grant reviewer’s contract with GDOE and there was a conflict of interest disclosure requirement in the contract that the reviewer recuse himself from reviewing grant applications for LEAs using his program. We found no evidence that the contractor did so. The contract’s conflict of interest requirement stated, "The Contractor agrees to recuse himself or herself from evaluating a specific application in the event that the Contractor . . . has any financial, business, or personal relationship with any of the applicants, and to immediately notify the Department in the event of such circumstances"

The grant reviewer was one of five contracted grant reviewers on the team reviewing the LEAs’ applications for round one of the application reviews. The grant reviewer reviewed grant applications for three LEAs that used his program. The three LEAs that used his program were approved for funding. GDOE should have more closely reviewed the grant reviewer’s resume to determine that the grant reviewer was the author of a reading program being used by its LEA applicants, and should not have assigned the grant reviewer to review the three LEAs using his program.

We consider a contracted grant reviewer reviewing the grant application for any LEA or school using a reading program authored or coauthored by the grant reviewer to have a potential financial relationship with the applicant, and therefore, a potential bias in reviewing the LEA or school's application more favorably. The grant reviewer's involvement with authoring a reading program gave the appearance of a potential conflict of interest. We also believe that the appearance of a potential conflict of interest existed when this grant reviewer reviewed the reading programs of his competitors. GDOE did not identify this potential conflict of interest because it only verified where the grant reviewer applicants were employed.

⁶ The program authored by the reviewer is Open Court and is a product of SRA/McGraw-Hill.

As a prudent contracting practice, GDOE should have enforced its contract requirements and ensured that the grant reviewer did not review grant applications for LEAs that used the grant reviewer's authored reading program, as well as competing programs. GDOE needs to develop and follow policies and procedures for contracting grant reviewers to ensure that prudent contracting practices are followed and potential conflicts of interest are avoided.

Adequate Guidance Was Not Provided to Grant Reviewers and Grant Reviewers' Comments Were Not Reviewed

GDOE did not provide adequate guidance for grant reviewers to follow in reviewing applications and providing feedback to applicants. In addition, GDOE did not review the results of grant reviewers' comments to identify the causes for grants not meeting approval and to ensure that grant reviewers were following instructions. In its approved grant application, GDOE stated "Technical assistance will also be offered to help them (LEAs) develop a plan for implementing a reading program that maintains the highest fidelity to SBRR. They will also be guided in the evaluation and selection of supplemental and intervention programs that are consistent with the core program as well as SBRR."

GDOE officials initially told the reviewers they could give feedback on specific programs. However, GDOE subsequently changed the instruction and asked the grant reviewers to concentrate on reviewing what the LEA explained about using the program in its application. In later rounds of grant reviews, GDOE officials told the reviewers not to comment on specific programs to be used by LEAs. In certain instances, the grant reviewers did not provide sufficient feedback for LEAs, or could not provide support for the feedback that was given. GDOE's contracted grant reviewers made feedback comments about whether certain programs were SBRR, when GDOE instructed them to review the application based on the information contained in the application. However, when asked whether reviewers were given authority to review programs contained in LEAs' applications, two GDOE Reading First staff members gave us different answers. One of GDOE's Reading First Coordinators stated that the grant reviewers were given the authority to review the reading programs being used by the LEAs, while another Reading First Coordinator stated grant reviewers were not given the authority to evaluate reading programs.

We interviewed a grant reviewer who wrote a comment on an LEA's application that indicated the LEA's reading program was "not SBRR." We asked him what he meant by "not SBRR" and he stated that he was concerned about the program because of the comments made at the table by other grant reviewers on his team, and he merely wrote the note "not SBRR." He could not provide us with any additional support for his comment. However, none of the other grant reviewers interviewed on that review team acknowledged making such comments. GDOE officials sent all notes and comments written by the grant reviewers to the LEAs to assist them in making changes or corrections to the grant application package. Officials at the affected LEA told us that the grant reviewer's comment about its selected program caused them to change their selection of a reading program.

In addition, GDOE provided the grant reviewers with the scoring rubrics to record scores and issues for clarification, but did not give adequate guidance to ensure that the grant reviewers recorded their comments directly on the scoring rubrics. Grant reviewers wrote comments directly on the LEA application, as well as the scoring rubrics. GDOE sent the applications back to the LEAs and did not maintain copies with the reviewers' comments. Therefore, GDOE did

not maintain complete support for the LEA grant funding decisions.⁷ GDOE maintained the rubric scoring documents to support reviewer scores for approved LEA applications. GDOE did not maintain the LEA and school grant applications containing grant reviewers' evaluation comments. GDOE staff stated that they did not intend to maintain the grant reviewers' evaluation comments. All documentation supporting an award should be maintained for the required time period. GDOE should have given clear and specific instructions to the grant reviewers to ensure they recorded their comments on the scoring rubrics.

EDGAR, 34 C.F.R. § 80.42 and 20 U.S.C. § 1232(f), the Department's General Provisions Concerning Education Programs, apply to all financial and programmatic records, supporting documents, statistical records, and other records of grantees or subgrantees and states that each recipient of federal funds shall maintain records to facilitate an effective financial or programmatic audit for which the funds are used. Also, according to the Georgia Secretary of State's Georgia Archives division, state and local agencies are required to maintain federal grant project files for five years after a final report is submitted or five years after the grant application is denied.

Regarding the evaluation of grant reviewer comments, the Reading First Program Manager stated that GDOE did not question grant reviewers about their application evaluation comments because GDOE did not want any independence issue raised by an LEA. Furthermore, GDOE's Program Manager indicated to us that GDOE's protocol was to not have any contact with the reviewers about their comments. The Program Manager stated that GDOE wanted to avoid the perception that help was provided to any LEA in evaluating the applications.

GDOE should have a formal mechanism for providing adequate guidance to grant reviewers and for providing the grant reviewer feedback to LEAs. Seven LEAs' applications were not approved for funding during Cohort 1. One of these LEAs was the largest LEA in the state. If GDOE had reviewed the results of the grant application reviews and reviewer comments, it may have been able to identify the causes for LEAs not being approved and provide these LEAs with timely guidance to help the LEAs address deficiencies in their applications. This technical assistance would help ensure that LEAs are implementing a reading program that maintains the highest fidelity to SBRR. Reviewing the results would also identify areas to improve the efficiency of the application and funding process, and ensure that grant reviewers are following instructions. This would have allowed the LEAs to resubmit their Reading First grant applications for further consideration during a subsequent round within Cohort 1.

LEA Private School Consultation Was Not Verified or Documented

GDOE did not ensure that LEAs consulted with private schools to determine eligibility for Reading First funds for Cohort 1. In GDOE's Cohort 2 LEA Subgrant Applications, GDOE required LEAs to document contact and consultation with private schools regarding eligibility for Reading First. The LEAs were also required to provide copies of letters sent to private schools.

⁷ We contacted the ten randomly selected LEAs plus one judgmentally selected LEA that received funding. Six LEA officials indicated GDOE did not require them to maintain the documentation. Two LEAs could not recall whether GDOE required them to retain the documents. Three LEAs stated GDOE specifically required them to maintain the documents, but these three could not provide any evidence of the retention requirement. However, we have no assurance that the other 27 LEAs that GDOE funded retained the documentation.

The Georgia Department of Audits and Accounts (State Auditor) performed an OMB Circular A-133 Single Audit for the year ending June 30, 2005. One of the State Auditor's findings related to the need for GDOE's management to verify that LEAs conducted timely and meaningful consultation with private school officials. GDOE concurred with the finding and stated, "The DOE is in the process of developing program operations manuals, which among many topics will address notification of private schools. The program manuals should be completed during fiscal year 2006." Georgia's fiscal year ended on June 30, but we confirmed with GDOE officials that they had not implemented formal policies and procedures for the Reading First program.

We also found that GDOE did not include private school consultation as a part of the scoring rubric for the review of the LEA and school applications. Of the 10 randomly selected grant applications reviewed, only one discussed private school participation. Of the 38 funded LEAs in Cohort 1, only two had private schools participating in GDOE's Reading First program.

According to 20 U.S.C. § 7881, SEAs and LEAs are required to "after timely and meaningful consultation with appropriate private school officials provide to those children and their teachers or other educational personnel, on an equitable basis, special educational services or other benefits that address their needs under the program." This is also required in Section 9501(a)(1) of the ESEA.

Because consultation with appropriate private school officials is a federal requirement, GDOE needs to develop written policies and procedures, which will address the private school consultation requirement to ensure the requirement is adequately reviewed and documented in approved applications. This would help ensure GDOE confirms that private schools are being properly consulted and have the opportunity to participate in the program. GDOE also needs to ensure that its staff, subgrantees, and contracted grant reviewers follow policies and procedures and comply with the applicable regulations covering the private school consultation requirement.

Recommendation:

We recommend that the Assistant Secretary for the Office of Elementary and Secondary Education require GDOE to —

- 1.1 Develop written policies and procedures for its LEA and school grant application process to ensure it follows state and federal Reading First law, regulations, and guidelines in administering the Reading First grant application process and program. At a minimum, the policies and procedures should include requirements that address:
 - Following the requirements in its approved state grant application to ensure LEAs properly select and use SBRR reading programs,
 - Verifying its contracted grant reviewers meet the qualifications contained in its RFQ for hiring grant reviewers, and meet the experience requirements contained in its federally approved grant application when hiring the reviewers,
 - Verifying that contracted grant reviewers do not have potential conflicts of interest prior to allowing grant reviewers to perform services,
 - Providing adequate guidance for grant reviewers to follow for reviewing applications and recording official comments,

- Providing clear guidance to LEAs to help them address and resolve deficiencies in their grant application being resubmitted for review,
- Ensuring supporting documentation for the grant application approval process is maintained as required under 34 C.F.R § 80.42, and
- Ensuring that the private school consultation requirement is adequately implemented and documented in approved grant applications.

GDOE Comments

GDOE did not agree with all parts of our finding, but concurred with the recommendation, as discussed below:

- GDOE concurred that it added a requirement for LEAs' selection of SBRR programs that was not approved by the Department.
- GDOE did not concur that there was no assurance that grant reviewer qualifications met experience requirements.

GDOE stated that grant reviewer qualifications, as submitted in their curricula vitae, were reviewed by Reading First program personnel. Curricula vitae packages that accompanied the signed request for quote were extensive. While it would have been optimum for each reviewer to meet each and every one of the qualifications listed on the RFQ, GDOE did not require such on the RFQ. Furthermore, very few individuals would have qualified, and GDOE would not have been able to develop teams comprised of varying experts in reading and literacy instruction with different strategies so each grant could receive a complete review.

GDOE also stated that while many of the criteria were not explicitly stated in the curricula vitae, a thorough review of the applicants' experience and professional work history indicated the level of experience with SBRR and with the Consumer's Guide.

GDOE further stated that no LEA was required to make changes to curricular materials based on the comments of grant readers, but certainly it would have been appropriate in certain instances for LEAs to make changes based on the comments of the grant reviewers.

- GDOE did not concur that the contract requirements for grant reviewers were not enforced.

GDOE stated that there was a conflict of interest disclosure requirement in each grant reviewer's contract with GDOE. This contract language required the reviewer to disclose to GDOE any conflict of interest. As GDOE purposefully did not review the grants prior to assigning them to reviewers, it was impossible for GDOE staff to screen the applications to ensure that there were no conflicts of interest. It was, therefore, the reviewer's duty and responsibility pursuant to the contract to immediately notify GDOE staff when and if a conflict arose and to

recuse him- or herself. If so alerted, GDOE staff would have immediately reassigned the reviewer. GDOE further stated that it shows that the burden of disclosure should rest solely upon the reviewer, because the reviewer is in the best position to identify a possible conflict of interest.

- GDOE did not concur that the guidance it provided to grant reviewers was inadequate and that grant reviewers' comments were not reviewed.

GDOE stated that comments of grant reviewers were never meant to be reviewed, pursuant to the independent, impartial grant review process proposed by GDOE and approved by the Department in the Georgia Reading First grant. Official grant reviewer score sheets were maintained on all LEAs and schools. GDOE further stated that this condition seems to be based on grant reviewer comments that may have been written on copies of the actual applications that were given to grant reviewers to read. These were not the official grant reviewer score sheets and the Reading First department did not review these reviewer comments prior to sending the grant applications back to the systems. Initially, personnel in the Reading First unit did not instruct the grant reviewers to refrain from writing comments on their copies of the actual grant applications while they were reviewing the applications. Accordingly, certain grant reviewers may have made notes in the margins or elsewhere on the grant applications while reading them. Furthermore, Reading First personnel did not initially inform grant reviewers that all grant applications would be mailed back to the LEAs and schools.

GDOE also stated that once the Reading First staff became aware that reviewers were making such comments directly on the applications, the staff notified reviewers not to do so.

- GDOE concurred that LEA private school consultation was not verified or documented.

OIG Response

We did not change the finding or recommendation in response to GDOE's comments. Regarding GDOE's response to the draft audit report, we have the following comments:

- There Was No Assurance that Grant Reviewer Qualifications Met Experience Requirements

While we understand that some of the RFQ qualifications were preferable, at least one was required. Since GDOE did not expect the reviewers to meet the explicitly required qualification(s), the RFQ should have been modified to better match the expected qualifications. Also, GDOE's ability to review the curricula vitae for the desired professional qualifications mentioned in the RFQ may have been improved if the desired qualifications were clearly stated in the curricula vitae.

Although an LEA may not have been required to make changes based on reviewer comments, the LEA would likely give considerable weight to comments from

reviewers it thought met the qualifications set forth in the RFQ. If the LEAs were not required to make changes based on reviewer comments, then using contracted grant reviewers for the application review process may not have been necessary since the changes appear to be optional.

- Contract Requirements for Grant Reviewers Were Not Enforced

GDOE is responsible for the administration of the Reading First grant. GDOE cannot assign accountability for properly administering the grant to its contracted grant reviewers. In its response to the previous condition, GDOE stated that grant reviewer qualifications, as submitted in the curricula vitae, were reviewed by Reading First program personnel. Therefore, GDOE should have been aware that the grant reviewer authoring a reading program stated that he was an author of the program in his vitae. GDOE should have noted that the author should not have been assigned to review any applications for LEAs using the program he authored. GDOE should also have noted the potential conflict of interest when the grant reviewer reviewed the reading programs of his competitors.

The grant reviewer that authored the reading program reviewed applications for 10 LEAs. It should not have been impossible for GDOE to examine the grant applications for these 10 LEAs. Furthermore, the LEA grant applications have a standard format and discuss the reading programs used by the LEAs in a specific part of the application, so it should not have been difficult for GDOE to determine whether the LEAs were using the reading program authored by the reviewer.

- Adequate Guidance Was Not Provided to Grant Reviewers and Grant Reviewers' Comments Were Not Reviewed

We reiterate that GDOE is responsible for the administration of the Reading First grant. While we are aware of GDOE's desire to have an independent and impartial grant review process, the grant review process may have been improved had GDOE reviewed the comments to identify the causes for grants not meeting approval and to ensure that grant reviewers were following instructions. GDOE did not have a control in place to ensure that all grant reviewer comments were included on the formal scoring rubrics so that comments could be adequately addressed. This may have been prevented if GDOE had formal written procedures for the grant reviewers to refer to.

Although the comments made on the copies of the grant applications sent back to the LEAs were not considered by GDOE to be official comments, the LEAs may have considered them to be official comments. By using only the scoring rubrics, and not the copies of the applications with grant reviewer comments, GDOE staff were not made aware of all grant reviewer comments when providing technical assistance. Technical assistance by GDOE staff would have been enhanced if they reviewed all comments returned to the LEAs. By reviewing these comments to the LEAs, the staff would be familiar with the grant reviewers' noted deficiencies and could offer timely assistance to the LEAs. This might help the LEAs to more adequately address required grant application improvements and

help LEAs avoid having to prepare multiple resubmissions to obtain approval for funding.

OTHER MATTERS

In determining the reasons LEAs were not funded for Cohort 1, we identified one LEA that was not funded in Cohort 1, but was funded for Cohort 2. This LEA received scores of zero on its grant applications for Cohort 1 based in part on the fact that it did not include information about its use of the Consumer's Guide. The LEA decided to reapply for funding in Cohort 2 and was funded. Our limited review of the Cohort 2 application showed that the LEA did not complete its own evaluation of core programs using the Consumer's Guide, but was nonetheless approved for funding. The LEA used the Consumer's Guide evaluations performed by other organizations.

Although we did not cover Cohort 2 in our audit period, GDOE did not change its requirement that LEAs follow the state's approved grant application by performing their own Consumer's Guide evaluation of reading programs they plan to use. According to GDOE's approved grant application, GDOE stated it would use the Consumer's Guide to ensure alignment to SBRR. GDOE officials stated that GDOE required LEAs to use the Consumer's Guide to select a SBRR program. As recommended above, GDOE Reading First officials need to ensure that they continue to monitor and follow the requirements in their approved state grant application.

OBJECTIVES, SCOPE, AND METHODOLOGY

The objectives of our audit were to determine whether GDOE (1) developed and used criteria for selecting the SBRR programs in accordance with the law and regulations and (2) approved the LEAs' applications in accordance with the law and regulations.

To achieve our objectives, we reviewed and tested GDOE's implementation of its approved grant application. Specifically, we examined:

- GDOE's Reading First application for its process of approving LEAs for funding;
- *A Consumer's Guide to Evaluating a Core Reading Program Grades K-3: A Critical Elements Analysis*, by Drs. D. Simmons and E. Kame'enui, along with other SBRR related documentation;
- ESEA's Reading First requirements, regulations, and Department guidance;
- GDOE's guidance provided to LEAs and grant reviewers;
- LEA subgrant applications;
- subgrant application scoring sheets;
- grant reviewer comments and resumes;
- a monitoring report generated by the Department contractor (American Institutes For Research); and

- the State of Georgia Single Audit reports for the fiscal years ending June 30, 2004, and June 30, 2005.

We interviewed officials from GDOE, 20 LEAs, four schools, and complainants. We also interviewed nine Reading First contracted grant reviewers that participated in GDOE's subgrant award process.

Our audit period was May 1, 2002, through September 30, 2005, and focused primarily on the Cohort 1 grant application process. Cohort 1 includes the first three of six years of possible funding. Any information concerning Cohort 2 is included in the LEA private school consultation issue and in the OTHER MATTERS section of this report.

To review grant applications and determine if GDOE awarded subgrants in accordance with the process identified in GDOE's approved application and the ESEA, we judgmentally selected one LEA that was mentioned in a complaint and we randomly selected 10 of the remaining 37 funded LEAs. In addition, we judgmentally selected the largest of the seven LEAs that were not funded. We also reviewed the scoring rubrics for all 38 funded LEAs and a school within each funded LEA. To confirm whether the final passing scores for funded LEAs and schools were calculated correctly by GDOE, we selected all LEAs that were scored 65 or less by the expert review teams. In addition, we made site visits to two of the LEAs.

We gained an understanding of GDOE's system of internal control over awarding subgrants, and we found weaknesses in GDOE's system of internal control. These weaknesses are related to GDOE's process for awarding subgrants to LEAs. These weaknesses are discussed in the AUDIT RESULTS section of this report.

We performed our audit work at GDOE's offices in Atlanta, Georgia, two LEAs' offices (Atlanta Public Schools and Butts County Board of Education), the complainants' locations, and in our Atlanta offices from October, 2005 through September, 2006. We discussed the results of our audit with GDOE officials during an interim briefing on June 27, 2006. We performed our audit in accordance with generally accepted government auditing standards appropriate to the scope of the review described above.

ADMINISTRATIVE MATTERS

Statements that managerial practices need improvements, 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 the appropriate Department of Education officials.

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 Education Department official, who will consider them before taking final Departmental action on this audit:

Raymond Simon
Deputy Secretary
U.S. Department of Education
Office of Elementary and Secondary Education
400 Maryland Avenue, SW
Washington, DC 20202

It is the policy of the U. S. Department of Education to expedite the resolution of audits by initiating timely action on the findings and recommendations contained therein. Therefore, receipt of your comments within 30 days would be appreciated.

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

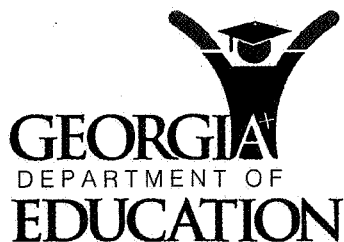
We appreciate the cooperation and assistance extended by your staff during the audit. If you have any questions, please call me at 312-730-1620.

Sincerely,

/s/

Richard J. Dowd
Regional Inspector General for Audit
Chicago/Kansas City Audit Region

Attachment



Office of the State Superintendent of Schools

Kathy Cox, State Superintendent of Schools

December 7, 2006

VIA U.S. MAIL AND ELECTRONIC MAIL

Mr. Richard J. Dowd
Regional Inspector General for Audit
U.S. Department of Education
61 Forsyth Street, Room 18T71
Atlanta, Georgia 30303

RE: Draft Audit Report, Control No. ED-OIG/A04G0003

Dear Mr. Dowd:

Please find enclosed the Georgia Department of Education's response to the Draft Audit Report: *Review of the Georgia Reading First Program*. As you will see in the enclosure, the Department agreed in part and disagreed in part with the overall finding of the Draft Audit Report. Since it was impossible for the Department to either concur or not concur with the overall finding, the enclosed response addresses each condition of the overall finding individually, concurring and not concurring as appropriate.

Thank you this opportunity to respond to the Draft Audit Report. If you have any questions or concerns, please do not hesitate to contact Department staff.

Sincerely yours,

Kathy Cox

KC/jlh

cc: Julie Morrill
Jennifer L. Hackemeyer, Esq.
Julie E. Lewis, Esq.

December 6, 2006

**Georgia Department of Education Response to United States Department of
Education Office of Inspector General Draft Report, ED-OIG/A04G003**

FINDING: GaDOE Did Not Have Written Policies and Procedures and Did Not Adequately Manage the LEA Grant Application Process.

It is not possible for the Georgia Department of Education ("GaDOE") to either concur or not concur with this overall finding. While GaDOE agrees that it did not have written policies and procedures in place, as noted by the first clause in the sentence, GaDOE disagrees that it did not adequately manage the LEA grant application process as stated in the finding's second clause. Accordingly, GaDOE has concurred or not concurred with each individual "condition" as identified under the overall finding in the Draft Audit Report.

A. Audit Results: Finding and Conditions

1. GaDOE added a requirement for LEAs' selection of SBRR programs that was not approved by the Department.

The GaDOE concurs with this condition. However, this advice was in place for less than three months for a grant that has been in place for over three years. Corrective action was taken in May, 2004 to remedy this condition. *See* Attachment A.

2. There was no assurance that grant reviewer qualifications met experience requirements.

The GaDOE does not concur with this condition.

The Georgia Reading First grant, approved by the United States Department of Education, did not contain language stating that the verification of reviewers' qualifications would occur. Grant reviewers were procured through the Georgia Department of Administrative Services (DOAS) via a Request for Quotations (RFQ) (*see* Attachment B). Forty-five potential reviewers responded to the request. The curricula vitae of the forty-five reviewers were collected and carefully reviewed. They were also used to prepare the scoring rubric used for selecting the final reviewers. Not only was verification of qualifications not required, but also failing to verify every qualification listed on every curriculum vita did not harm a single beneficiary or potential beneficiary of the grant. GaDOE is unaware of any allegation that the credentials of any grant reviewer were fraudulent. Finally, the time associated with verifying each and every qualification for each and every potential grant reviewer was neither warranted, required nor feasible.

December 6, 2006

Grant reviewer qualifications, as submitted in their curricula vitae, were reviewed by Reading First program personnel. Curricula vitae packages that accompanied the signed request for quote were extensive. While it would have been optimum for each reviewer to meet each and every one of the qualifications listed on the RFQ, GaDOE *did not* require as such on the RFQ (*see* Attachment B). Furthermore, very few individuals would have qualified, and we would not have been able to develop teams comprised of varying experts in reading and literacy instruction with different strategies so each grant could receive a complete review. GaDOE listed all of the credentials and then rank ordered the reviewers in order to select the most qualified reviewers. Of the two individuals who did not have doctoral degrees, one was a Reading First Director from another state who met all other requirements; the other was an educator who is highly respected in this state as knowledgeable in all areas of reading research, the Reading First statute, using the Consumer's Guide and SBRR. The latter was selected because one of those who had originally accepted dropped out at the last minute such that the entire review process would have been jeopardized if there were not equal numbers of team members.

In order for grants to receive a non-biased review, it was important that they be read by a panel of outside reviewers. While many of the criteria were not explicitly stated in the curricula vitae, a thorough review of the applicants' experience and professional work history indicated the level of experience with SBRR and with the Consumer's Guide. The report cites two of the reviewers for not having experience in elementary education. However, one of these applicants, who has received her doctorate in special education, has conducted three reading projects for K-1 teachers, has developed linguistics-skills training programs, and has conducted a course on reading for beginning readers with disabilities. She also has taught elementary reading methods courses. The other reviewer cited as lacking elementary experience has a doctorate in Literacy Education that includes elementary coursework. In order to balance the team, reviewers appearing to lack knowledge in a specific area were placed in a group with someone whose background included that skill.

All reviewers received six hours of training prior to beginning to work with their teams to score grants. They participated in an exercise in which they read and scored a mock grant and then had a discussion about the scoring process to anticipate as many potential questions as possible. During the entire Grant Review session, GaDOE Reading First staff was on hand to answer questions.

GaDOE offered contracts to grant reviewers with extensive backgrounds and expertise in reading and literacy instruction and education based on their national reputations and resumes. No LEA was required to make changes to curricular materials based on the comments of grant readers, but certainly it would have been appropriate in certain instances for LEAs to make changes based on the comments of the grant reviewers. Numerous opportunities existed for LEA personnel to interact with GaDOE Reading First personnel to confer about grant

December 6, 2006

reviewers' comments. GaDOE's contract and selection process ensured that the grant reviewers selected were the most qualified to review LEA and school Reading First applications.

3. Contract requirements for grant reviewers were not enforced.

The GaDOE does not concur with this condition.

There was a conflict of interest disclosure requirement in each grant reviewer's contract with GaDOE. This contract language required the reviewer to disclose to GaDOE any conflict of interest. As GaDOE purposefully did not review the grants prior to assigning them to reviewers, it was impossible for GaDOE staff to screen the applications to ensure that there were no conflicts of interest. It was, therefore, the reviewer's duty and responsibility pursuant to the contract to immediately notify GaDOE staff when and if a conflict arose and to recuse him- or herself. If so alerted, GaDOE staff would have immediately reassigned the reviewer.

GaDOE shows that the burden of disclosure should rest solely upon the reviewer, because the reviewer is in the best position to identify a possible conflict of interest.

4. Adequate Guidance Was Not Provided to Grant Reviewers and Grant Reviewers' Comments Were Not Reviewed.

The GaDOE does not concur with this condition.

Adequate guidance was provided to grant reviewers. Comments of grant reviewers were never meant to be reviewed, pursuant to the independent, impartial grant review process proposed by GaDOE and approved by the United States Department of Education in the Georgia Reading First grant. Official grant reviewer score sheets were maintained on all LEAs and schools. GaDOE maintained grant reviewer comments in the manner in which it stated it would and in conformance with the training it provided.

In addition to participating in reading and scoring a mock grant, reviewers received additional training by GaDOE staff and Southwest Educational Development Laboratory. During this time, reviewers had an opportunity to ask questions, obtain clarification and seek guidance from GaDOE staff. During the grant review process, a GaDOE staff member was available to work with team members to answer clarifying questions. GaDOE could not answer specific questions relating to the quality, complexity or level of completeness an LEA provided to a specific grant question. To do so would have been in direct conflict with the concept of an impartial, externally-reviewed competition.

December 6, 2006

This condition seems to be based on grant reviewer comments that may have been written on copies of the actual applications that were given to grant reviewers to read. These were not the official grant reviewer score sheets and the Reading First department did not review these reviewer comments prior to sending the grant applications back to the systems. Initially, personnel in the Reading First unit did not instruct the grant reviewers to refrain from writing comments on their copies of the actual grant applications while they were reviewing the applications. Accordingly, certain grant reviewers may have made notes in the margins or elsewhere on the grant applications while reading them. Furthermore, Reading First personnel did not initially inform grant reviewers that all grant applications would be mailed back to the LEAs and schools.

Once the Reading First staff became aware that reviewers were making such comments directly on the applications, the staff notified reviewers not to do so. Even if Reading First staff had reviewed the comments, it would have been inappropriate and incongruous with our independent grant process to review such comments, as the process was designed to avoid even the appearance of bias or impropriety. The official grant reviewer comments were intended to assist LEA's in making their grant applications stronger and clearer. As the grant application is intended to be an LEA's implementation plan, it was pertinent that each question be answered with clarity. If the reviewer required more information or the answer was unclear, it is doubtful that the LEA could implement the plan effectively.

Each system that was not funded during the initial round was assigned a Reading First program specialist to provide technical assistance to further develop their grants. During this time, while working with system writing teams, comments could be discussed. Reading First staff was directed to answer questions and provide assistance, but not to rewrite answers on the applications for LEA's or schools.

5. LEA Private School Consultation Was Not Verified or Documented

The GaDOE concurs with this condition. As a result of a state audit in 2005, GaDOE revised our application for cohort 2 and added information in the grant application. The changes in the grant application process that were instituted for the second cohort of applicants for Reading First funding required applicants to provide evidence of the private schools with which they made contact within the grant application (*see* Attachment C).

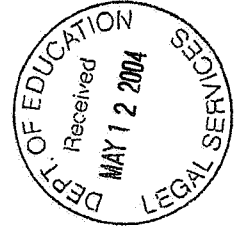
B. Recommendation

December 6, 2006

GaDOE concurs with the recommendation to develop written policies and procedures. In the event that GaDOE receives a new Reading First grant, this recommendation will be followed.

Further, GaDOE is currently in the process of developing written policies and procedures that all program managers can use in administering federal and state grants. If Georgia receives another reading grant, GaDOE plans to tailor those policies and procedures and implemented them in accordance with the recommendation contained in the audit report.

Attachment A



Georgia Department of Education
Office of the State Superintendent of Schools
Twin Towers East
Atlanta, Georgia 30334-5001
(404) 656-2800 Fax (404) 651-8737
www.doe.k12.ga.us
(404) 657-8318 FAX (404) 651-8582

Kathy Cox
State Superintendent of Schools

May 11, 2004

Shirley Thomas
Sylvester Road Elementary
103 Eldridge Street
Sylvester, GA 31791

Dear Sir or Madame:

Greetings! I hope things are going well for you as you begin the journey of implementation of Reading First in Georgia. Things have been moving at a furious pace here at the Department of Education. The purpose of this letter is to provide you with some information regarding the selection of materials to purchase with your federal Reading First grant money.

It has come to my attention that some schools may want to purchase materials that have not been reviewed at the Oregon or Eastern Regional Reading First Technical Assistance Center's (ERRFTAC) web sites. While I had previously stated that these reviews must be read and considered before materials were purchased, this is not necessary. It is, however, necessary for you to thoroughly evaluate the materials for purchase internally to determine the materials' usefulness to your comprehensive reading programs within your Reading First schools. Further, it is important to ensure that the materials you purchase are scientifically research based.

Sincerely,

Kenneth M. Proctor, Ed.D.
Reading First Program Manager

cc: Kathy Cox
Stuart Bennett
Dr. Ida H. Love
Dr. Eloise Barron
Alice Smith
Judson Turner

Attachment B

RETURN TO:
 Department of Education
 Reading
 Suite 1758, Twin Towers East
 205 Jessie Hill Jr. Drive SE
 Atlanta, GA 30334

Request for Quotation

Request For Quote ID.	Date	Bid Closing Date/Time	Page
41400-024-0000000330	10/30/2003	11/14/03 04:45:00	2
Buyer	Buyer Phone		
David L. Childers	404/657-2195		

Vendor: RFQ_BLANK
 .NAME _____
 ADDRESS: _____

 E-MAIL: _____
 FEI# or GA VNDR ID: _____

Ship To: Department of Education
 Reading
 Suite 1758, Twin Towers East
 205 Jessie Hill Jr. Drive SE
 Atlanta, GA 30334

Line	Item	Description	Quantity	UOM	Brand & Model	Unit Price	Need Date
		<ul style="list-style-type: none"> o Preferably Ph.D. * Must be available dates listed * Experience with the Consumer's Guide for Evaluating Core Reading Programs * Experience with valid and reliable assessments o Preferably knowledge of DIBELS, ITBS, GORT IV, Yopp-Singer, PPVT, & WRMT-R, Experience with system and school based reform o Preferably Reading Reform Experience with SBRR o Preference given to those who have worked with the National Reading Panel, the National Institute of Child Health and Human Development in Reading Research, or the National Institute for Literacy o Preferably experience reading and scoring federal grants especially Reading First either for USED or other states <p>Honorium of \$5,000 plus expenses at state per diem.</p> <p>Chairperson's Requirements (5-7)</p> <p>Doctorate in Reading, Language Arts, Educational Psychology, Linguistics, or Speech</p> <ul style="list-style-type: none"> o Preferably research one facility o Background in Elementary Education o Preferably Ph.D. Must be available dates listed Experience with the Consumer's Guide for Evaluating Core Reading Programs Experience with valid and reliable assessments o Preferably knowledge of DIBELS, ITBS, GORT IV, Yopp-Singer, PPVT, & WRMT-R, * Experience with system and school based reform o Preferably Reading Reform * Experience with SBRR o Preference given to those who have worked with the National Reading Panel, the National Institute of Child Health and Human Development in Reading Research, or the National Institute for Literacy o Preferably experience reading and scoring federal grants especially Reading First <p>Honorium of \$6,000 plus expenses at state per diem.</p> <p>(Persons applying for chairperson must indicate whether or not they would be willing to participate as a reader if not selected as a chairperson.)</p> <p>Task: Readers and chairpersons will be asked to submit their vita and intent to participate prior to deadline. Each applicant will also be asked to rank their preference in reading grants between urban, rural, or suburban applications.</p> <p>Accepted participants will be contacted and contracted with through the Reading First office in the</p>					

*use qualifications
 as written from
 SA's grant
 + gives brief descrip.
 of what our reading
 will be like*

*read assessments
 that our schools
 have to give*

RETURN TO:
 Department of Education
 Reading
 Suite 1758, Twin Towers East
 205 Jessie Hill Jr. Drive SE
 Atlanta, GA 30334

Request for Quotation

Request For Quote ID.	Date	Bid Closing Date/Time	Page
41400-024-0000000330	10/30/2003	11/14/03 04:45:00	3
Buyer	Buyer Phone		
David L. Childers	404/657-2195		

Vendor: RFQ_BLANK
 .NAME _____
 ADDRESS _____

 E-MAIL: _____
 FEI# or GA VNDR ID: _____

Ship To: Department of Education
 Reading
 Suite 1758, Twin Towers East
 205 Jessie Hill Jr. Drive SE
 Atlanta, GA 30334

Line	Item	Description	Quantity	UOM	Brand & Model	Unit Price	Need Date	
		<p>GADOE. Upon completion of a contract the readers will receive an electronic copy of Georgia's Reading First application, the system and school subgrant applications along with the scoring rubrics and rating forms. A separate bid process is taking place to determine the exact location the grant reading will take place the in the Atlanta area. On or before January 16 the readers will mailed the applications that they will be reading on a PC formatted CD. The numbers readers will be asked to read will vary depending on the preference indicated by the reader's preference and the need according to the grants submitted. Participants will be required to read grants prior to their arrival on January 22. and score grants as an individual. They will then meet as groups of 5 to come to a consensus on the grant. Each participant will be responsible to completing an electronic scoring sheet for each grant read and returning the CD of grants mailed to them along with the scoring sheets prior to leaving the last day.</p>						

Attachment C

