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BY THE COMPTROLLER GENERAL

Report To The Congress OF THE UNITED STATES

Greater Use Of Exemplary Education Programs Could Improve Education For Disadvantaged Children.

Although low-achieving students in many of the Nation's federally funded compensatory elementary and secondary education projects have improved their performance, large percentages of students in some projects continue to fall further behind their peers.

The National Diffusion Network is the primary system the Department of Education uses in meeting the congressional mandate to disseminate information about successful education practices in State and local education agencies to improve the quality and effectiveness of Federal programs. Although some school districts have adopted the Network's exemplary projects, the number of adoptions is too small to greatly affect the overall quality of the Nation's compensatory education projects. A greater effort should be made to identify projects needing improvement, and better data on the effectiveness of the Network's exemplary projects should be made available to school officials.

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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON D.C. 20548

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To the President of the Senate and the
Speaker of the House of Representatives

This report discusses the potential for improving education for disadvantaged children through greater use of exemplary education programs available through the Department of Education's National Diffusion Network. We examined the Network's efforts to promote the adoption of exemplary programs by local school districts to improve reading projects conducted under title I of the Elementary and Secondary Education Act.

Copies of the report are being sent to the Director, Office of Management and Budget, and the Secretary of Education.

Milton J. Jordan

Acting Comptroller General
of the United States

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COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

GREATER USE OF EXEMPLARY EDUCATION
PROGRAMS COULD IMPROVE EDUCATION
FOR DISADVANTAGED CHILDREN

D I G E S T

Federal programs for elementary and secondary education are intended to help disadvantaged students acquire basic education skills, improve their rate of academic achievement, and ultimately help them become self-sufficient and self-supporting. By far the largest of these programs is that authorized under title I of the Elementary and Secondary Education Act. Title I was envisioned as a potent tool for dealing with poverty and its attendant conditions, such as illiteracy, high dropout rates, delinquency, and crime. (See p. 1.)

To improve the effectiveness of these programs, the Congress mandated that the Department of Education (ED) disseminate information about successful education practices to State and local education agencies.

The National Diffusion Network, established by ED in 1974, disseminates information on various "exemplary" education projects that have been found highly effective. The Network is ED's primary mechanism for disseminating information on exemplary title I projects and for helping local school districts to implement such projects. GAO reviewed the Network's performance in helping local school districts to improve their title I projects by adopting exemplary projects. (See pp. 2, 6, and 7.)

OPPORTUNITIES FOR IMPROVING
TITLE I BY ADOPTING
EXEMPLARY PROJECTS

Although many title I reading projects are improving the academic achievements of educationally disadvantaged students, some projects are not successful and should be improved. GAO's analysis of student progress in about 340 schools in 14 districts revealed that many students continue to fall behind their normal (average) achieving peers. Title I services are discontinued for most students while they are still far behind their peers in academic achievement. Furthermore, many needy students are

excluded from receiving title I services because of the high cost of some projects and limitations on the amount of available funds. (See pp. 8, 9, 11, and 12.)

GAO's comparisons of the accomplishments of title I projects with the reported capabilities of the Network's exemplary title I projects indicated that many school districts could improve their title I services by adopting exemplary projects. Not only were the exemplary projects reporting greater achievements, but they sometimes cost less and could serve more students. (See pp. 9 to 11.)

GREATER EFFORTS NEEDED TO
ENCOURAGE ADOPTION OF
EXEMPLARY TITLE I PRACTICES

Some school districts have adopted exemplary projects for title I settings, but the number of adoptions is too small to have any significant impact on improving the effectiveness of title I in meeting its nationwide goals. (See p. 17.)

Evaluation criteria and State
monitoring need improvement

Title I administration has shortcomings at the Federal, State, and local levels. ED has not prescribed adequate criteria for State and local title I officials to use in assessing their projects, and Federal monitoring has been weak and has failed to emphasize project quality. Similarly, State education agencies have provided limited monitoring of local project results and have not ensured the adequacy of project evaluations and the effectiveness of title I projects.

Without adequate Federal and State emphasis on project quality, relatively few local school districts have sought to improve title I projects. Local title I officials generally have not used project evaluations in project planning and improvement and, in some cases, have not developed local evaluations that are suitable for identifying project weaknesses. (See pp. 17 and 18.)

Information is needed
on accomplishments
of exemplary projects

Relatively little information is available about the capabilities and accomplishments of the Network's exemplary projects. Therefore, local school district officials are not convinced that exemplary projects are better than their own, and few school districts have sought to implement these projects. (See p. 28.)

Increased followup of project
adoptions is needed

Little is known about the achievements of school districts which have adopted exemplary projects because the Network has made little attempt to follow up on project adoptions.

The Network's revised operating instructions call for monitoring and evaluating project adoptions and for providing data on project outcomes at the adoption sites. The revised instructions, however, do not specify

- the nature of monitoring and evaluation to be performed or
- the data to be collected and reported on project outcomes. (See p. 30.)

Limited data about results also hampered Network officials in assessing the Network's impact on the title I program. Because the Network did not have uniform reporting requirements for its operations, it did not have reliable information on the number of exemplary project adoptions that served title I projects. (See p. 33.)

RECOMMENDATIONS

To improve the procedures for identifying and correcting title I project weaknesses, the Secretary of Education should

- provide substantially increased guidance and technical assistance to State and local school officials in developing criteria for assessing the effectiveness of title I projects;

- expand ED's monitoring efforts for assessing whether State education agencies are (1) meeting their responsibilities to evaluate the effectiveness of local title I projects and (2) helping local school districts to improve their title I projects;
- direct State education agencies to (1) assess the validity of procedures local school districts use to evaluate their title I projects, (2) prescribe corrective measures where procedures are inadequate, and (3) help local school officials use evaluations for detecting and correcting project weaknesses; and
- advise State education agencies to encourage local school officials to use Network assistance in improving title I projects.

To convince potential adopters of the merits of exemplary projects, the Secretary should direct the Network to provide complete, current information about the capabilities and accomplishments of the Network's exemplary projects, including (1) their impact on scholastic achievement, student behavior, and sustained growth, (2) their cost effectiveness, and (3) the results of past adoptions by other schools.

To provide more accurate data on the volume of title I adoptions and ensure that adoptions are successful, the Secretary should make sure that the Network's plans to require followup on project adoptions are adequate to (1) provide accurate data on the number of adoptions and the schools affected, (2) determine whether the projects have been installed correctly and are functioning properly, and (3) provide for additional implementation assistance where needed. (See pp. 36 and 37.)

AGENCY COMMENTS

In a draft of this report, GAO proposed that ED prescribe specific criteria for State and local officials to use in assessing the effectiveness of title I projects. In its response to the draft (see app. III), ED disagreed with GAO's proposal. ED believes that its October 12, 1979, title I evaluation regulations, which provide

models and technical standards for evaluating title I projects, are adequate criteria on evaluation.

GAO believes that ED's obligation in fulfilling its requirements does not end with the publication of evaluation models and technical standards. ED should place increased emphasis on providing technical assistance at the State and local levels in developing criteria for assessing the effectiveness of title I projects. This would be consistent with ED's long-standing policy of nonintervention in the programmatic decisionmaking process at the State and local levels.

According to ED, implementation of the title I evaluation system will permit local school districts to assess their title I achievement gains on the same metric or scale and therefore permit States to review results across school districts. ED said that national aggregation will enable State and local education agencies to view the levels of their gains in light of the ranges of gains reported nationally. Additionally, ED should use the national, regional, State, and district level information that it collects to provide increased guidance to State and local officials concerning criteria for assessing the effectiveness of title I projects; GAO has revised its recommendation accordingly. ED agreed with the thrust of GAO's other recommendations. ED's comments are discussed on pages 37 through 42.

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ABBREVIATIONS

ED	Department of Education
ESEA	Elementary and Secondary Education Act of 1965
GAO	General Accounting Office

CHAPTER 1

INTRODUCTION

To improve the quality and effectiveness of Federal programs to assist educationally disadvantaged children, the Congress mandated that the Department of Education (ED) identify successful education programs and disseminate information about them to States and local school systems. To meet this mandate, ED uses the National Diffusion Network as its principal system to disseminate information about exemplary education projects and to help schools implement such projects.

Recognition of the national need to assure that educationally disadvantaged children are provided suitable educational opportunities has spawned a number of Federal programs to assist education in elementary and secondary schools. Federal programs for elementary and secondary education generally are intended to help the disadvantaged to develop their basic skills, improve their rates of academic achievement, and help them become self-sufficient and self-supporting.

The largest Federal program for elementary and secondary education comes under title I of the Elementary and Secondary Education Act of 1965 (ESEA) (20 U.S.C. 241a). The Congress, recognizing the link between inadequate educational opportunities and poverty, authorized the title I program to assist educationally disadvantaged children. Title I was envisioned as a potent tool for dealing with poverty and its attendant conditions, such as illiteracy, high dropout rates, delinquency, unemployment, and crime.

Under title I, funds are provided to States and local school districts to help them provide compensatory education programs for educationally disadvantaged youths. These programs focus on developing basic skills in reading, language arts, and mathematics. Since the program's inception in 1965, funding has totaled about \$30 billion. For fiscal year 1981 about \$3.7 billion has been provided for the program, which is expected to reach about 14,000 of the Nation's approximately 16,000 school districts.

In its desire to improve the quality of the Federal education programs, the Congress recognized the need for dissemination of effective educational practices. Congressional mandates to disseminate information to improve education programs now appear in various laws. Title I of ESEA mandates that ED (1) develop procedures for identifying successful educational projects and practices and (2) disseminate information on such projects and practices to States and local school districts.

ED DISSEMINATION ACTIVITIES

The National Diffusion Network--the largest of ED's dissemination mechanisms--is responsible for disseminating information on a wide range of education projects in such diverse areas as bilingual and immigrant education, career and vocational education, early childhood education, environmental education, special education for the handicapped, arts and communication skills, mathematics, reading, and language arts. The Network is also ED's primary means for disseminating information on exemplary title I projects and practices.

Since its inception in 1974, the Network funding has totaled about \$59 million. As shown in the graph on the following page, funding has been somewhat erratic, averaging about \$7.4 million per year but ranging from zero in 1976 to \$11.5 million in 1979. Of the Network funds, ED officials report that about \$1.25 to \$1.75 million per year is directed to title I dissemination activities. By comparison, the annual title I budget now exceeds \$3 billion.

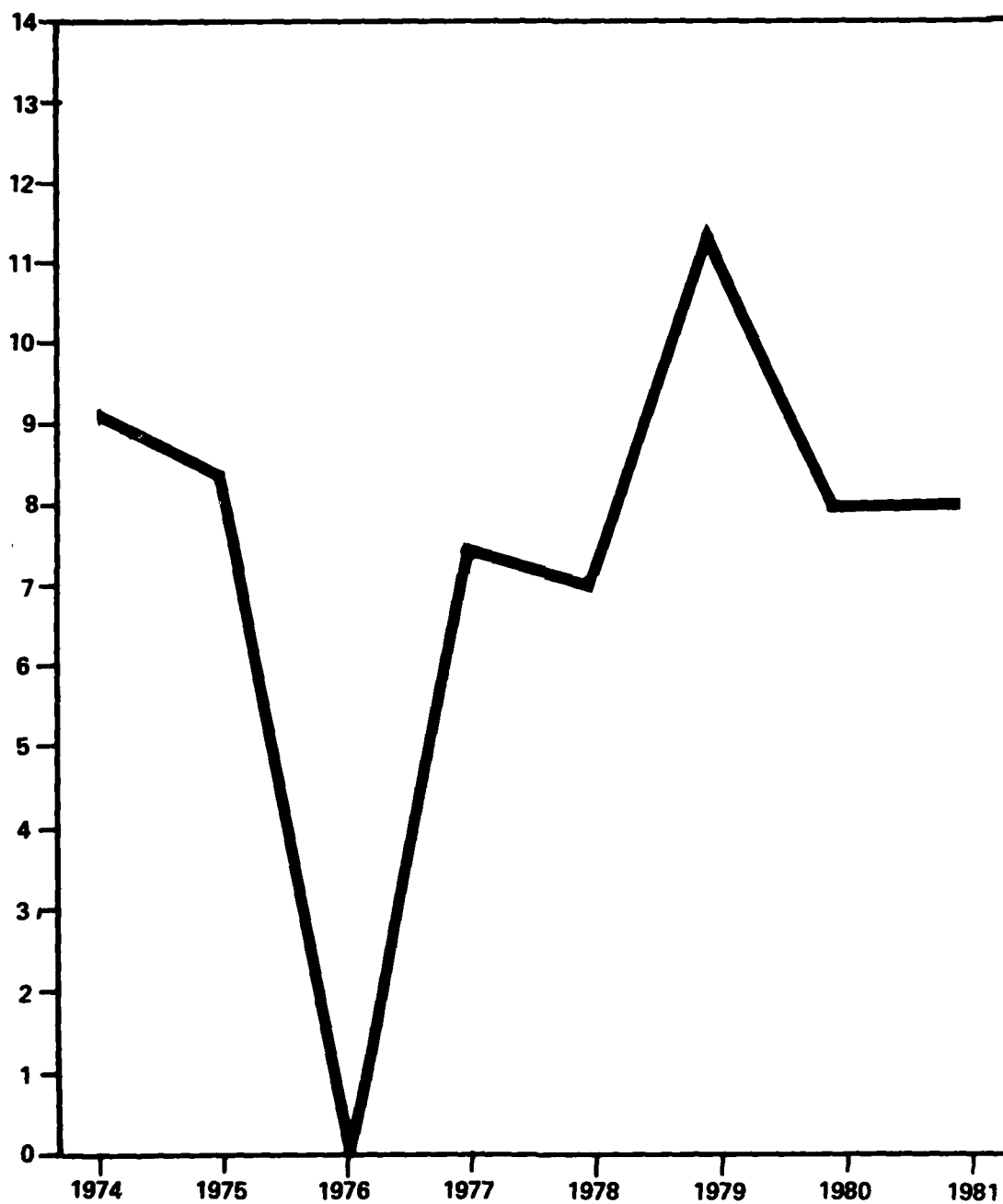
Before fiscal year 1976, the Network was funded under title III, section 306, of ESEA, as amended. This legislation expired at the end of fiscal year 1975, and the Network was not funded in fiscal year 1976. In fiscal year 1977, the Network was funded under section 422a of the General Education Provisions Act. Beginning with fiscal year 1980, authority for Network funding was contained in sections 303 and 376 of ESEA.

The Network's overall goal, as prescribed by ED, is to improve education practices by broadcasting information about successful projects and practices and assisting in the widespread implementation of these projects and practices. ED instructs Federal and State education program officers to be alert to identify highly successful education projects, including title I projects, and to encourage the project developers to seek validation by the Joint Dissemination Review Panel.

ED established the Joint Dissemination Review Panel to review data on educational projects and assess whether the projects had produced substantial educational improvement and whether they could produce similar improvements at other locations. Officers of the various ED program divisions may nominate identified projects for panel review. Projects approved by the panel are termed "exemplary"--they are the only ones that may be endorsed and disseminated by the Network.

The Network's activities to disseminate information about exemplary projects and to help schools implement the projects are carried out largely by education project "developer-demonstrators" and by dissemination "facilitators."

\$ MILLIONS



Developer-demonstrators

School districts that have exemplary projects approved by the Joint Dissemination Review Panel can apply for developer-demonstrator funds from the Network. Developer-demonstrators are typically education agencies that originated the projects and are responsible for helping school districts implement their projects. The developer-demonstrators are expected to provide information describing their projects, develop materials needed to implement their projects, demonstrate their projects to interested school officials, and conduct training sessions for school personnel.

Not all exemplary projects are selected to become developer-demonstrators. In selecting developer-demonstrators, Network officials attempt to acquire a wide variety of projects and educational approaches for school systems to choose from. By fiscal year 1979, the Network had awarded contracts to 21 developer-demonstrators to market and help install exemplary title I projects.

State facilitators

The Network also contracts with organizations in specific geographical areas throughout the Nation to facilitate the adoption process by linking school districts with developer-demonstrators. These facilitators usually are assigned to cover specific States and are called "State facilitators."

A State facilitator's primary responsibility is to widely disseminate information to local school systems within its State or area. Facilitators acquaint schools with the exemplary projects, help schools determine how the exemplary programs might benefit the schools, and provide a link between the developer-demonstrators and schools that express interest in adopting exemplary projects.

Network accomplishments

ED's assessments of the Network have generally been favorable, based on observations such as the following:

- The Network has successfully promoted a large number of adoptions; ED reported 5,600 "instances of adoption" since the Network began in 1974.
- The Network provided training in exemplary project operations to about 25,000 teachers in 4,200 schools during the 1978-79 school year.
- The adopted programs are highly regarded by the adopting school officials.

--The demand for the Network's services exceeded its capacity to provide them.

--Existing exemplary programs can be installed for an average cost of \$4,000 whereas developing such a program costs \$400,000.

These assessments were centered on the Network's overall activities in promoting program adoptions. The assessments did not distinguish between different types of education programs, such as title I projects.

ADMINISTRATION OF TITLE I RESPONSIBILITIES

Besides requiring that exemplary title I projects be identified and disseminated to States and local school districts, ESEA requires ED to

--review each State's title I grant applications and assure that program plans are adequate and complete,

--monitor each State's title I project activities for compliance with legislative requirements, and

--provide standards and models for project evaluations and provide technical evaluation assistance to States.

The Office of Dissemination and Professional Development and the Office of Compensatory Education have major roles in carrying out ED's title I responsibilities. The Office of Dissemination and Professional Development operates the Network, which is responsible for

--improving the quality of education nationwide, including title I projects;

--disseminating information on successful title I education practices;

--promoting widespread adoption of successful title I education practices;

--helping schools to implement exemplary education projects;

--providing training and technical assistance to adopting schools;

--evaluating the effectiveness of the adoption process;

--providing postadoption technical assistance to adopting schools; and

--selecting dissemination facilitators and developer-demonstrators to carry out the Network's activities.

Although actively promoting the improvement of title I projects through the adoption of exemplary projects, the Network does not have any formal responsibility for conducting the title I program. The Office of Compensatory Education is responsible for the overall administration of the program, which includes

--providing guidance to State and local school officials,

--reviewing State title I grant applications,

--assuring that State title I responsibilities are fulfilled,

--reviewing and assessing title I program data submitted by States, and

--identifying successful education programs and practices.

OBJECTIVES, SCOPE, AND METHODOLOGY

Because of the concerns of educators and evaluators that title I projects are not achieving intended goals and the explicit intent of the Congress that ED and school officials disseminate successful practices to improve title I projects, our review focused on the Network's efforts to improve title I reading projects. Toward this end, we reviewed (1) the Network's actions to promote adoptions of exemplary projects for title I, (2) the suitability of data that school districts have for assessing the need for title I project improvement, and (3) school officials' actions to adopt better title I projects. Our review focused on reading projects because most title I projects are reading-language oriented.

Our review included examinations of legislation; Federal regulations; Network records, reports, and materials; State and local education agency procedures, records, and project assessments; and federally funded evaluations of title I and other education programs. We interviewed officials at

--ED's Office of Dissemination and Professional Development, its Office of Compensatory Education, and the National Institute of Education;

--State education agencies in five States;

- dissemination facilitators in five States under contract with the Network;
- seven exemplary project developer-demonstrators; and
- twenty school districts that had implemented exemplary title I projects.

Also, we visited 47 local school districts in six States, including the above five States, to ascertain the Network's impact on the districts. These school districts were selected to provide a mix of small, medium, and large districts in rural and urban locations. The school districts we visited are not a statistically valid representation of all school districts nationwide, nor, in our opinion, was the sample necessarily nationally representative. However, these districts represent a wide variety of sizes, types, locations, and environments.

Chapter 2 of this report assesses the potential for improving title I projects. Chapter 3 examines the effectiveness of mechanisms to identify title I projects needing improvement and of the Network's activities to promote adoptions of exemplary projects for title I. Our conclusions and recommendations and ED's response are in chapter 4.

CHAPTER 2

GREATER USE OF EXEMPLARY PROJECTS

COULD IMPROVE TITLE I PROGRAMS

Low-achieving students in many of the Nation's title I projects have improved their reading achievement rates. Some title I projects, however, are not producing significant achievement in reading and need improvement. Students in these latter title I projects are continuing to fall further behind average achieving students. Often title I services terminate before students reach suitable achievement levels. In some cases, the high cost of title I projects contributed to the premature termination of the services.

Through the Network, ED disseminates information on exemplary projects proven capable of producing significant educational achievements that are worthy of implementation in other schools and sometimes cost less than existing title I projects. Our comparisons of exemplary projects with title I projects in school districts we visited indicate that substantial improvements might be realized through greater use of exemplary projects. Implementing an exemplary project in an adopting school district, however, is a complicated process requiring staff training and assistance.

NEED TO IMPROVE EFFECTIVENESS OF EXISTING PROGRAMS

Studies of the national impact of title I programs have raised questions as to whether the projects have improved students' achievement rates. A 1975 ED-funded study ^{1/} showed that, on the average, title I students tended not to fall further behind non-title I students during the academic year. However, the study also showed that many schools failed in their goals to help disadvantaged students gain on their peers and that many students were continuing to fall behind. ED reported in its 1978 annual evaluation report that title I projects have demonstrated modest success, but that much work remains.

A 1980 study funded by ED ^{2/} compared the reading growth of title I students with that of similarly disadvantaged students who did not have any compensatory reading assistance. This study concluded that title I students (1) in grades 1, 2, and 3 grew at a faster rate than disadvantaged students not receiving compensatory

^{1/}"A Descriptive and Analytic Study of Compensatory Reading Programs" (Trismen, Waller, and Wilder), 1975.

^{2/}"The Sustaining Effects Study: An Interim Report," L. Carter, October 1980.

education and (2) in grades 4, 5, and 6 grew at the same rate as the unserved disadvantaged students.

Using a different comparison standard, we analyzed the reading achievement gains of title I students in about 340 schools involving 14 school districts. (See app. II for analysis methodology.) 1/ Our analysis used a more stringent standard in that it compared the pretest to posttest gain of title I students with students at the same grade level who scored at the national pretest average. We made this comparison to ascertain whether title I projects were enabling the disadvantaged students to gain on their normal (average) achieving peers. 2/ This analysis disclosed that many students made significant gains while in title I projects. For example, the reading achievement gains of 60 percent or more of the students in four districts consistently equaled or exceeded 1 year per year of instruction. However, in some other districts significant portions of the students continued to fall behind the regular students. In about half of the years analyzed, 40 to 67 percent of the students were falling further behind their normal achieving peers. At the time their title I assistance was terminated, the students in our sample were an average of 1.5 years below grade level.

INCREASED USE OF EXEMPLARY PROJECTS COULD IMPROVE EFFECTIVENESS OF TITLE I PROJECTS

To determine whether exemplary projects could make title I projects more effective, we sought to examine whether exemplary projects produce greater achievements than other title I projects and whether adopting an exemplary project enables a title I project to improve its achievement levels.

Although comparable achievement data were not always available for title I exemplary projects, our analysis of data available for six projects 3/ indicated that exemplary projects have

1/ED expressed concern about our reliance on the grade equivalent metric or scale in this report. According to a report on controversies in evaluating compensatory education prepared by the American Institute for Research for the National Institute of Education, all available metrics or scales have weaknesses. However, the report notes that none of the available metrics or scales has the same clarity and simplicity of meaning as grade equivalents. Our use of grade equivalents is further discussed in appendix II.

2/The evaluation models developed by ED compare the performance of title I students with similarly disadvantaged students that received no compensatory assistance.

3/All six exemplary projects were either developed for title I projects or recommended by the Network for use in title I.

good potential for improving the effectiveness of compensatory education in public schools. One title I exemplary project, for example, reported that 85 percent of its students gain at a rate of more than 1 year per year of instruction. For comparison, we selected 22 sample groups of title I students in the 14 school districts where we analyzed title I achievement. (See app. II for a description of the sample group selection process.) Students in 21 of the 22 sample groups were not able to attain the rate of achievement reported by the exemplary project in any of the years analyzed.

None of the six exemplary projects reported average gain rates below the normal achievement rate of 1 year's gain per year of instruction expected for average students. In contrast, over half of the 22 sample groups were below the normal achievement rate in at least 1 of the years analyzed and 2 groups were below this rate in each year analyzed. One title I exemplary project reported that the mean gain of students served was 1.7 years per year of instruction. This rate was not reached by 15 of the 22 sample groups in any year analyzed. No sample group averaged this rate in each year analyzed.

Other exemplary projects also reported significant accomplishments. One project reported average gains ranging from 1.4 to 1.9 years per year of instruction for various sample groups. A project that used student tutors to assist title I students reported gains ranging between 1.2 and 3.7 years per year of instruction for both the tutors and the students being tutored. Another exemplary project reported that it doubled the rate of gain of the students it served.

According to ED, the Joint Dissemination Review Panel has assessed the reported exemplary project gains and can attest to their validity and educational significance. Information accumulated by one exemplary project showed that adopting districts had also achieved success. This exemplary project, which regularly provided followup assistance to adopting schools, reported that achievement gains of students in 21 adopting school districts ranged from 1.1 years in grades 2 and 3 to 1.8 years in grades 7 and 8.

USING EXEMPLARY PROJECTS COULD BE LESS COSTLY

Many school districts have title I projects that cost more than some relatively inexpensive exemplary projects. The compensatory education projects in the 14 districts where we assessed achievement gains cost up to \$778 per pupil per year. The average per pupil cost was \$450 per year, and only one district had a per pupil cost below \$300 per year.

In contrast, the six exemplary projects mentioned above were much less expensive. The most expensive exemplary project cost \$281 per pupil per year, and the average cost of the six projects was \$180 per pupil, less than half the average cost of the projects in the 14 school districts. Thus, these exemplary projects were not only more effective in raising student achievement, but also less costly. Increased use of such projects might enable school districts to serve more students over longer periods.

According to ED officials, millions of children eligible for title I services are not being served because of limitations in program funding. Additionally, each year title I services to a million or more children are terminated prematurely (i.e., before the students reach normal achievement levels for their age and grade level). However, ED has not assessed the potential for addressing this problem through development and replication of exemplary projects that cost less than existing title I projects. ED officials pointed out that project costs can vary widely because of teacher salary differentials and other factors, such as the degree of reliance on low-cost tutoring approaches to compensatory education.

Eligible children not served

According to ED officials, precise information is not available on the number of low-achieving students eligible for title I services but not receiving them. ED officials estimate, however, that only about half of the Nation's low-achieving eligible students receive title I services. A 1978 study for ED ^{1/} reported that most of the Nation's low-achieving elementary students do not receive compensatory education from title I or any other source. Other studies have reported that compensatory education beyond the elementary level is almost nonexistent.

Only one of the five State education agencies we visited had any information on the number of eligible students not served by title I projects. This State reported that about 219,000, or 65 percent, of the State's eligible students were not receiving title I services.

Services terminated prematurely

Title I services are discontinued for many students while they are still far below their peers in academic achievement. This generally occurs when the students are advanced to a grade level not having title I services or are replaced by needier students.

^{1/}"Students' Economic and Educational Status and Selection for Compensatory Education," V. Breglio, et al., 1978.

ED officials testified 1/ that many eligible students are excluded from title I projects because sufficient funds are not available. According to ED, most title I services are at the elementary level, and a high percentage of title I funds are used for the first three grades. ED officials estimate that an additional one-third to one-half of the elementary students need compensatory services and that the need at the secondary level is far greater.

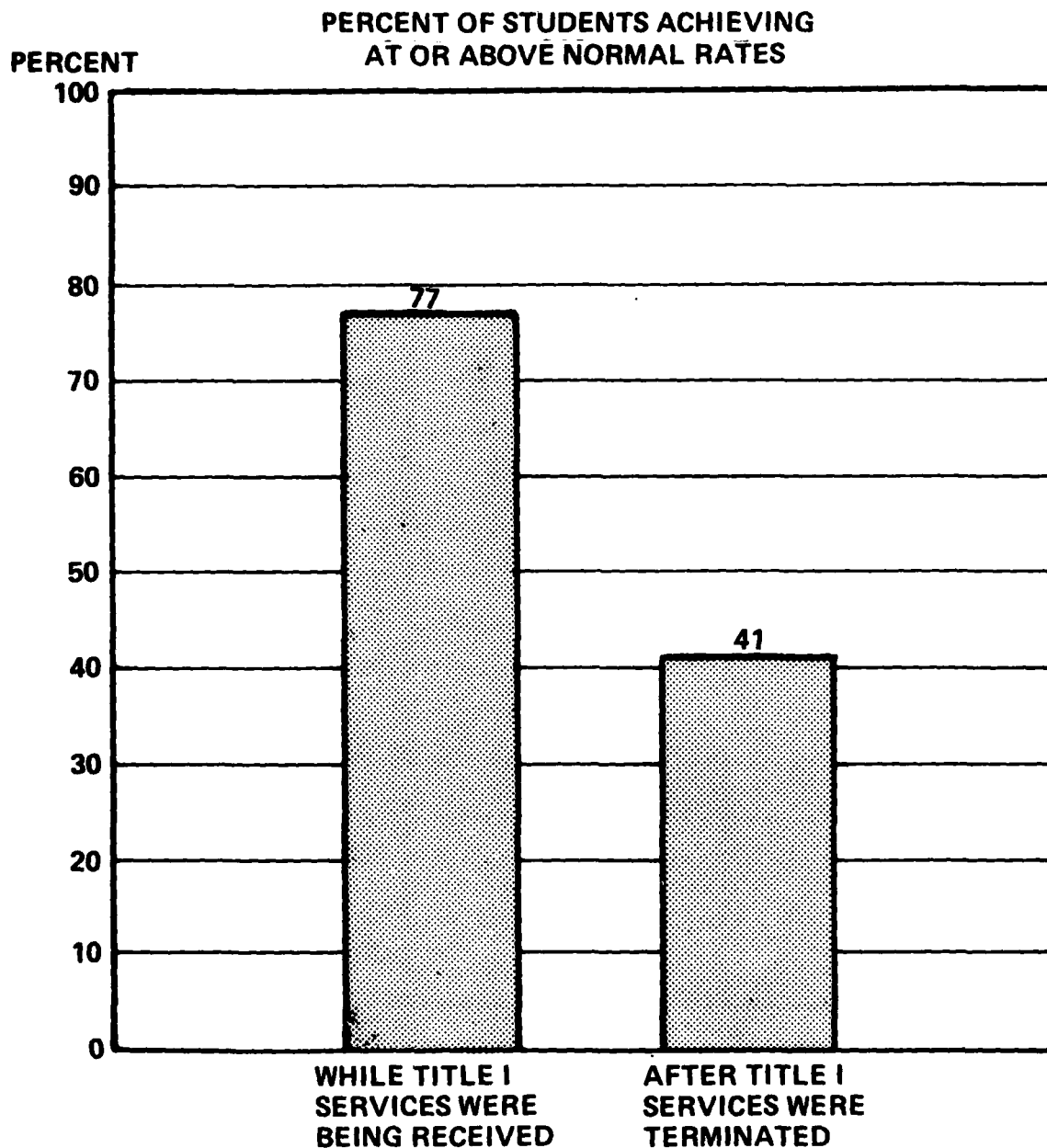
Educators we talked to in the five States we visited expressed concern that the need for compensatory education was not being met beyond the early grades. The Congress, concerned about the high rate of illiteracy, stipulated 2/ that school districts should consider extending title I services in intermediate and secondary levels to sustain the gains of earlier services. Recognizing the need for compensatory programs at the secondary level, ED has begun to publicize exemplary programs appropriate for secondary schools.

The results of our analysis of student achievement gains suggest that concern over the progress of low-achieving students denied compensatory assistance may be well founded. Nearly 11,000 students in our sample groups had their compensatory assistance terminated or substantially interrupted (by 1 school year or more) during the period analyzed. When the assistance was terminated, the students' rate of achievement gain declined by an average of 0.6 years per year of instruction. While receiving compensatory assistance, most of these students were gaining on their normal achieving classmates. However, when the assistance was terminated, the average rate of gain dropped well below the normal rate. This pattern of pronounced decline in rate of achievement occurred in 11 of the 14 school districts analyzed.

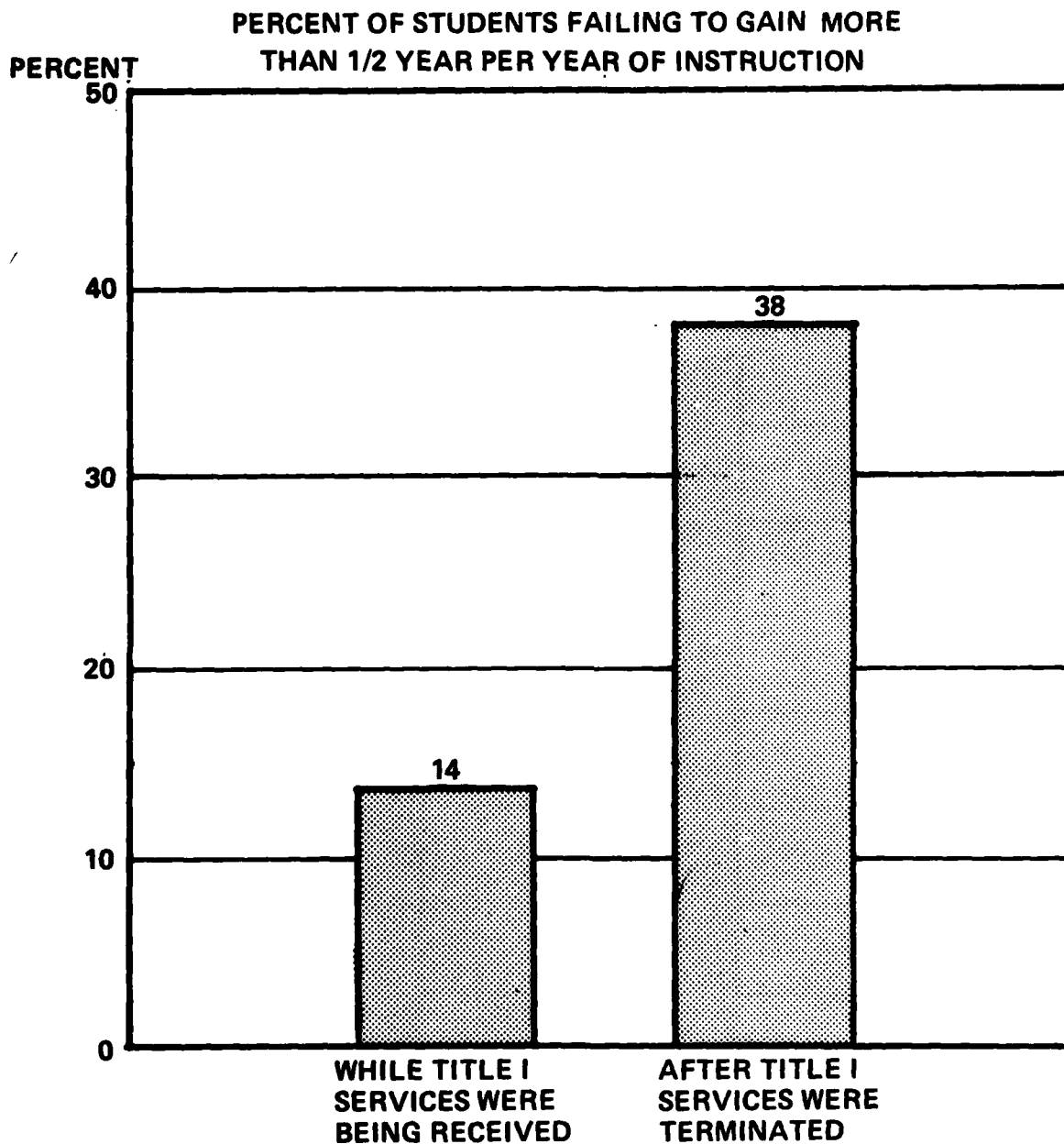
This decline in average achievement gain rate was confirmed by a corresponding drop in the number and percentage of students gaining at or above the normal rate of 1 year per year of instruction. As shown in the following graph, the percentage of students gaining at or above the normal rate for average students while receiving compensatory reading assistance declined from 77 to 41 percent when assistance was terminated.

1/Hearings before a subcommittee of the House Committee on Appropriations, March 15, 1978, p. 86.

2/Senate Report No. 95-856, May 15, 1978, Education Amendments of 1978.

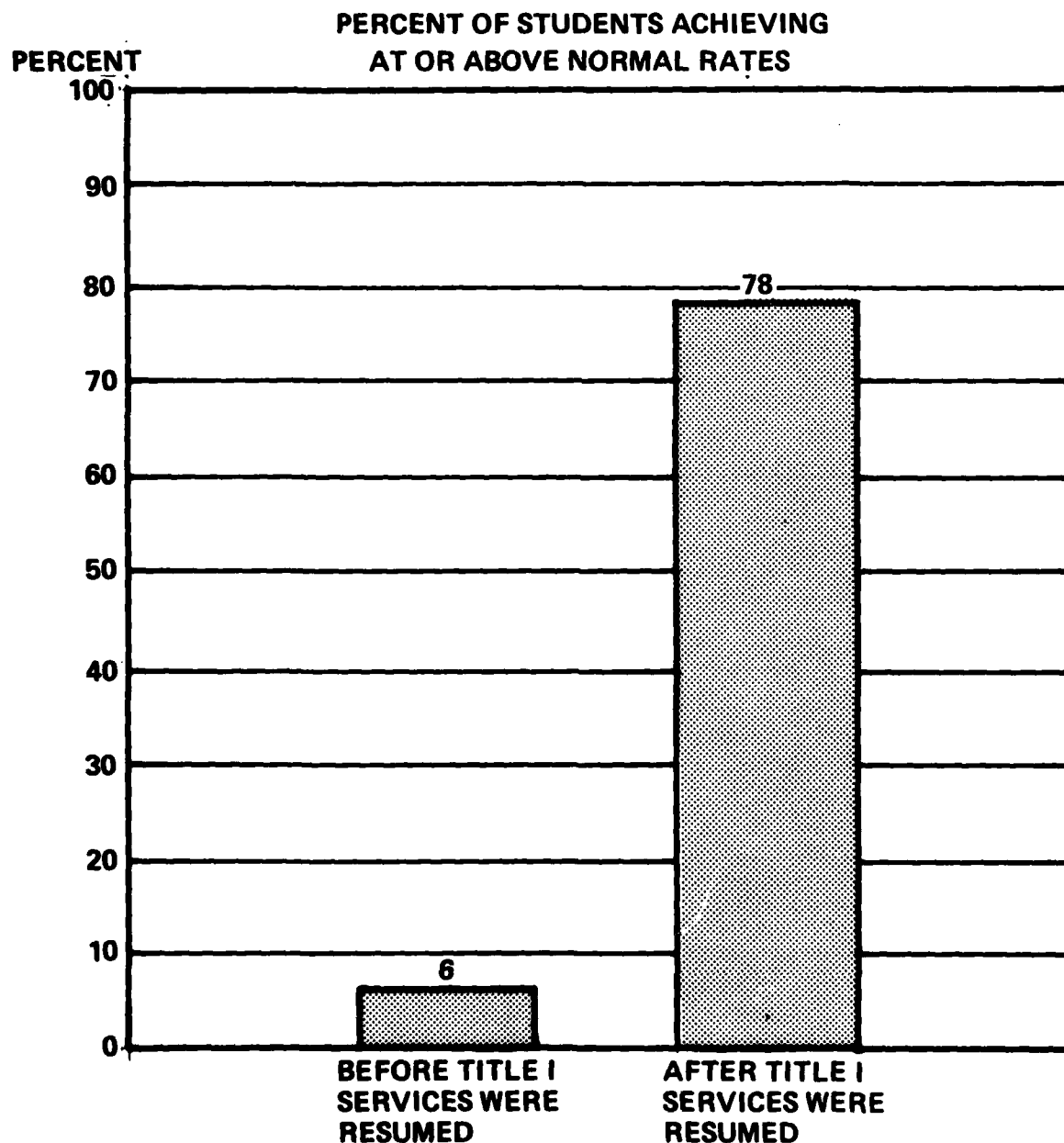


Similarly, the percentage of students rapidly falling behind their peers (those gaining at half the normal rate or less) increased from 14 to 38 percent when assistance was terminated. This increase is shown in the following graph.



Compensatory reading students in the 14 districts we analyzed were still far behind their normal achieving classmates when their compensatory assistance ended. The average achievement level of these students was 1.5 years below grade level when their title I assistance ended. This deficit ranged from 0.5 to 2.4 years below grade level in the districts analyzed.

In one large school district, title I assistance was resumed for 1,195 students after they had been out of the program for at least 1 school year. Their rates of achievement gain dropped significantly when the title I assistance was initially terminated, and very few were able to gain at the normal rate or better while out of the program. However, when title I assistance was resumed, the achievement rates of many of these students increased significantly. As shown in the following graph, the percentage of students keeping up with or gaining on their peers jumped from 6 percent while out of the program to 78 percent when assistance resumed.



Terminating title I services before the students attain acceptable achievement levels appears to conflict with the title I goal of assisting educationally deprived students in acquiring the basic skills needed to become self-sufficient in a competitive society. Services for most title I students are discontinued in the elementary grades, whereas most dropouts occur between grades 9 and 12. The Department of Health, Education, and Welfare reported in 1977 that nationwide about one in four students fail to graduate from high school. Dropout rates for large city schools may be higher. One large city reported that nearly half of its students drop out. In our opinion, the premature termination of compensatory education services increases the chances that underachieving students will fall further behind their peers and eventually drop out of school. If this occurs, title I is unlikely to achieve its goals of assisting the disadvantaged to become self-sufficient and of reducing illiteracy and poverty.

CHAPTER 3

LACK OF EFFECTIVE TITLE I EVALUATIONS

AND LIMITED EXEMPLARY PROJECT DATA

HINDER ADOPTION OF NETWORK PROJECTS

Although many title I projects need improvement, relatively few schools have adopted exemplary projects. Only about 60 (3 percent) of the 1,958 school districts in four of the five States we visited had adopted an exemplary project for use in their title I projects by the start of the 1978-79 school year. (The Network facilitator for one State said that adequate data on project adoptions were not available.) Only 1 of the 47 local school districts we visited had adopted any of the Network's title I exemplary projects. Most adoptions of exemplary projects are for use in a single school, thereby further limiting any impact the Network could have on title I projects.

Local school officials were generally not receptive to adopting the Network's exemplary projects, in part because inadequate evaluations had allowed the officials to remain satisfied with their title I projects and because they were not convinced that the exemplary projects were better than their projects. The reluctance of school officials to adopt exemplary projects has been perpetuated by (1) the failure of Federal, State, and local agencies to make effective evaluations and (2) the lack of information about the exemplary projects, which school officials consider important to convince them of the projects' merits. Effective evaluations and more comprehensive information about exemplary project costs and achievements would help local title I officials to more adequately consider exemplary projects as an alternative.

However, regarding evaluations:

- ED has not given States adequate criteria for assessing title I project quality.
- States have not effectively assessed the quality of title I projects, and ED has not adequately monitored the States' activities in this area.
- Local evaluations of title I projects have been deficient.

Also, the Network's lack of exemplary project data concerning student achievement, project costs, impact on student behavior, and adoption results has contributed to local school officials' lack of confidence in the projects.

LACK OF ADEQUATE CRITERIA FOR
EVALUATING PROJECT EFFECTIVENESS

Title I requires that local school districts evaluate the effectiveness of their title I projects. Sections 183(b) and (d) of title I require ED to (1) develop and publish standards for evaluating project effectiveness and (2) provide models for evaluating title I projects to be used by State education agencies. The models are to include uniform procedures and criteria for local and State education agencies to use in evaluating title I projects. Although this requirement has been in effect since 1974, as of September 1980, ED had not provided adequate criteria for evaluating project effectiveness.

School districts are required by title I legislation to use the results of evaluations in planning for and improving their title I projects. Without more specific criteria to assess project effectiveness, local and State education officials lack a valuable tool for determining whether their title I projects need improvement. One State official said that, without such specific criteria, local officials lack a standard to use in measuring their projects' effectiveness. This official believed that local school officials would seek better projects (including exemplary projects) if their existing projects did not meet a specified standard.

In lieu of more specific criteria for assessing the effectiveness of title I projects, ED has issued general instructions that require local school districts in making evaluations to

- use appropriate and accurate tests,
- use appropriate and accurate analysis procedures,
- include a representative sample of the students served, and
- provide valid measures of title I student performance compared to estimates of what the performance might have been had title I services not been provided.

Also, pursuant to requirements of title I legislation, ED has prescribed uniform evaluation models for school districts to use in assessing their projects.

Although the above instructions and models provide guidance for evaluation procedures, or inputs, they do not provide adequate criteria for determining what levels of performance are satisfactory.

ED's evaluation models provide comparisons between the actual gains of title I students and estimates of the gains that the students would have realized without title I assistance. Under

this system, positive scores (gains above zero) indicate that the title I students performed above what they would have without compensatory assistance. Negative scores indicate that the students' performance was below what they would have realized without such assistance. ED guidelines, however, do not specify what levels of positive gain might be considered appropriate, or what levels might indicate project improvements were needed.

ED officials told us that the specification of criteria to separate satisfactory from unsatisfactory projects is technically unsound and educationally indefensible. ED officials believe a requirement that performance standards be met often results in distortions and dishonesty in evaluations and fosters an unnecessary, counterproductive adversarial atmosphere between agencies.

ED NEEDS TO IMPROVE MONITORING OF STATE TITLE I ACTIVITIES

ED is responsible for assuring that State education agencies are meeting their responsibilities under the title I program. State agencies have primary responsibility for monitoring and evaluating local title I projects. As part of this responsibility they are to encourage schools with deficient title I projects to adopt promising educational programs. However, neither ED nor States have met their responsibilities. Consequently, they are not always aware of projects that need improvement and, therefore, are not able to encourage adoptions of exemplary projects or to provide other guidance for improving title I projects.

ED monitoring of State title I monitoring is limited

Although ED is responsible for determining whether States are meeting their title I responsibilities, it does not direct its activities toward assuring that States foster effective title I projects. ED is required by title I legislation to:

- Assess whether State applications meet the requirements of title I law and whether the requirements will be carried out.
- Submit enforcement reports to the Congress disclosing the (1) extent to which State procedures satisfy the title I requirements, (2) manner in which ED's monitoring reports were considered in approving State applications, (3) findings of ED's onsite monitoring visits, and (4) actions taken to correct problems identified during the visits.

ED's administration of title I has not been effective in getting States to meet program development responsibilities. Historically, ED's title I monitoring has focused on whether the funds

were used properly, not on whether they were used effectively. Consequently, most of the weaknesses cited by ED in its reviews of State title I activities have pertained to violations of the technical provisions of the law and not to program effectiveness.

ED officials told us that their title I monitoring emphasized compliance with appropriate procedures and not achievement or quality. Our review of 14 ED monitoring reports for the five States we visited disclosed that virtually all the problems identified by ED monitoring dealt with compliance violations. None of the 14 monitoring reports we reviewed contained exceptions relating to project accomplishment or disclosed whether project achievement levels were adequate. States also directed their monitoring efforts toward compliance elements.

In the past, insufficient staff levels may have hampered ED's ability to adequately monitor title I projects. In its 1978 Annual Report, the National Advisory Council on the Education of Disadvantaged Children stated that ED's title I monitoring had been substantially reduced. The National Institute of Education's Compensatory Education Study ^{1/} also expressed concern over ED's ability to adequately monitor State title I activities. The Institute reported that ED's monitoring and enforcement had declined significantly and that States were not effectively supervised.

ED officials said that, after issuance of the Council and Institute reports, ED increased its title I monitoring staff from 18 to 37 persons. They said that ED intends to put more emphasis on monitoring title I project achievement.

State assessments of project effectiveness are not adequate

States are required by law to assess local title I projects to assure that (1) project quality is acceptable, (2) local evaluations are properly conducted, and (3) program deficiencies are corrected. State title I assessments, however, generally do not focus on project quality and are not adequate to detect title I projects needing improvement.

State education agencies have primary responsibility for monitoring local title I projects. In enacting title I, the Congress considered States' monitoring essential to determining the quality of title I services at the local level. States' responsibilities, as set forth in titles I and V of ESEA, are to

^{1/}"Compensatory Education Study: Administration of Compensatory Education," National Institute of Education, 1977.

- monitor the effectiveness of title I projects,
- determine whether local title I projects are of sufficient quality,
- determine whether local school districts are adequately evaluating the effectiveness of their title I projects,
- evaluate the effectiveness of title I projects in improving the educational attainment of educationally disadvantaged children,
- assure that deficiencies and noncompliant practices detected through monitoring and evaluation are corrected, and
- disseminate and encourage adoption of promising educational practices.

State agency monitoring activities, however, generally focus on school districts' "compliance" with title I requirements dealing with such matters as allocating funds and selecting children to be served. Little State monitoring is directed toward program development or improvement.

A 1977 study of title I administration ^{1/} funded by the Department of Health, Education, and Welfare reported that, although States are responsible for helping local school districts to improve program operations, many States had not assumed their program development responsibility. The study stated that:

- State monitoring of program quality was superficial and historically incomplete.
- States did not have adequate systems for title I project development.
- States did not hold school districts accountable for their title I programs and were not doing an adequate job of getting school districts to implement effective title I services.
- State title I evaluation policy was restricted to ensuring that local test data had been submitted.
- States did not question the uses local school districts were making of their evaluations and made little effort to help schools link project evaluations to project design.

^{1/}"A Study of the Administration of the Elementary and Secondary Education Act, Title I, in Eight States," 1977.

--States had not informed school districts that evaluations are important to project design.

--States implied that they did not attach much importance to program improvement when they failed to examine how evaluations are used to plan for title I activities.

State monitoring in all five State education agencies we visited focused on compliance elements, not project effectiveness. Title I officials at one State agency told us that more extensive monitoring was needed to enable the State to identify project weaknesses and encourage schools to adopt exemplary projects. These officials said their State lacked title I project evaluation data because it had a small monitoring staff. Only one-fourth of a full-time equivalent staff person was budgeted for project monitoring and evaluation.

The title I coordinator in another State said that it is not the State monitors' function to recommend program changes when weaknesses are observed. The State's function, according to this official, is to monitor for compliance with the title I regulations, not to recommend changes or encourage schools to adopt exemplary projects.

Public Law 95-561, enacted November 1, 1978, clarified the role of States in title I program management. In developing title I legislation, the Congress intended that States consider local project evaluations before approving local applications for title I funds. States were expected to disapprove applications for projects that had not raised levels of student achievement.

Local title I officials tend to be reluctant to implement changes to their projects. Stimulus from State education officials might be necessary to alert school officials to project inadequacies and to motivate project improvements. States that lack suitable assessments of project quality are not able to provide such stimulus and are not meeting the intent of title I legislation.

LOCAL PROJECT EVALUATIONS ARE DEFICIENT

Local school districts are required to evaluate the effectiveness of their title I projects and to report the evaluation results to State education agencies. Specifically, title I legislation requires that local school districts:

--Adopt effective procedures for evaluating their title I projects.

--Use objective measures of educational achievement.

--Use the results of the school districts' evaluations in planning for and improving title I project activities.

Local school district evaluations varied considerably in nature and quality. Generally, however, these evaluations included various forms of tests to measure student achievement levels. The local evaluations were usually based on standardized norm-referenced tests. In the past, these tests were designed to measure the achievement level of students in relation to the level attained by a nationally representative student sample. The norm scores were based on the results of tests given by the testmaker to samples of students intended to be representative of the group for whom the tests were designed. As indicated on page 18, ED's new evaluation models provide for comparisons between the students' achievement and estimates of what the students would have achieved without title I assistance.

School district evaluations, however, are seldom used to identify needed program improvements and were often based on methodologies that produce inaccurate results. School officials' limited adoption of the Network's exemplary projects may have stemmed in part from deficiencies in local school district evaluations of title I activities. Superficial or deficient project evaluations may fail to disclose serious project shortcomings. Unaware of these shortcomings, local officials may see no reason to adopt the Network's exemplary projects. Despite the lack of specific criteria for measuring success, implementing ED's evaluation models could improve the quality of local evaluation models.

Local evaluations not used for project improvement

In designing title I legislation, the Congress intended that local evaluations would enable school districts to identify weaknesses in their title I projects and would serve as a tool for project revision and improvement. Local title I officials, however, tend to resist change to their projects even though some project evaluations showed (1) many of the students were continuing to fall behind, (2) many needy students were totally excluded from the projects, and (3) many students were dropped from the projects before reaching the level of achievement of their peers. Officials in 41 of the 47 districts we visited were not interested in adopting new title I projects. Most were satisfied with their existing projects and therefore not willing to consider replacing them.

Studies funded by the Department of Health, Education, and Welfare have reported that school districts made little use of title I evaluations for project improvement. Instead, local evaluations were used primarily to meet title I reporting

requirements. The 1977 study of the administration of title I 1/ concluded that local school districts

- lacked systematic processes for effectively developing title I projects,
- gave little attention to project planning aspects of their evaluations, and
- prepared evaluations primarily to meet reporting requirements.

Another study 2/ dealing with the uses of local title I evaluations reported that, rather than critically assessing their projects, school officials tended to seek evidence supporting their positive feelings and to ignore evidence to the contrary.

Inappropriate methodology reduces the validity of local evaluations

Deficiencies in local assessments of project effectiveness have been compounded by the low quality of title I evaluations. We previously discussed this problem, along with the attitude of local officials that title I evaluations are not useful for assessing project effectiveness, in a September 1977 report. 3/ In that report, we pointed out that over half of the State title I officials we surveyed believed that local title I evaluations were less than adequate in terms of credibility of findings, presentation of required management information, and qualification and quantification of measurement data. Also, our report said that studies by other organizations had shown that:

- Evaluation designs were not adequate to produce reliable data on measurable achievement gains.
- School officials lacked incentives to collect or report program output data.
- School personnel did not show much ability or interest in using evaluations to formulate title I policy or practice.

1/Ibid, page 27.

2/"Local Uses of Title I Evaluations," SRI International, 1978.

3/"Problems and Needed Improvements in Evaluating Office of Education Programs" (HRD-76-165, Sept. 8, 1977).

Problems were also noted in the way local school districts conducted their project evaluations during our review at 14 school districts. These problems seriously affect the reliability and usability of the evaluations to determine whether and how projects need to be improved. Some of these problems are the (1) failure to control sample groups in evaluating project achievement, (2) use of improper methods to compute student achievement, (3) use of inappropriate tests, (4) failure to measure sustained gain and total program effect, and (5) failure to consider project efficiency and cost effectiveness.

Sample groups not controlled

Achievement in title I projects is generally measured by pre-testing students near the start of a school year and posttesting them near the end. The difference in average achievement level between the students pretested and those posttested is considered the average gain for the subject and grade level being evaluated. For such a measurement to be meaningful, the sample groups tested must be carefully controlled to assure that the evaluations measure the intended characteristics accurately.

However, some school districts did not control their test groups to assure that students tested actually received title I assistance in the subjects being evaluated. As a result, some evaluations measured the gains of students who were not receiving title I assistance for the subject evaluated. Many such students were scoring well above the national average on the tests, thereby possibly biasing the evaluation results. Where this occurs, the evaluations do not provide accurate information on the achievement gain of students actually served and, therefore, are not useful in determining whether improvements are needed.

A related problem was the failure to assure that the same students were pretested and posttested. Obviously, testing one student at the beginning of the year and another at the end will not yield information on the gain of either student. However, it was not unusual for as many as 40 percent of the students to be either pretested but not posttested, or vice versa. Some school districts do not consider differences in the makeup of students between pretest and posttest groups. Such differences in the test groups resulted in title I project achievement gains being substantially overstated or understated. ED officials said that guidelines for project evaluation now specify that pretesting and posttesting must be compared on an individual student basis and that, if instructions are followed correctly, pretest and posttest groups should be the same.

Improper methods used to compute student achievement

Some school systems' procedures for computing student achievement produced distorted measurements. In several school districts, for example, title I evaluators were using methods to compile average grade level equivalent scores that distort computations of achievement levels.

In another district most of the second grade students were not pretested, and gain was measured as if the students had started from a pretest score of zero. This practice improperly inflated test results because gains achieved over a 2-year period were reported as a 1-year gain.

Inappropriate tests used

Some schools' inappropriate use of achievement tests produced misleading or useless results. In some cases, for example, the posttests and pretests measured different skills. Some schools used tests that were not appropriate for the achievement levels of the students tested.

Some schools frequently changed the brand or type of test used to measure student achievement. At times, the change was made within a single evaluation period. Frequent changes in types of tests make it difficult to compare and evaluate the test results.

One district had developed its own tests to measure skills taught in the classroom. The title I evaluation system allows for the use of locally developed tests where the gain on the local test is translated into a national metric or scale. However, if the gain on the local test is inaccurate, translations to a national metric or scale will not correct the problem. Analysis of achievement tests by testing consultants showed that most locally developed tests were of poor quality. Locally developed tests are not thoroughly tested, as are most of the standardized achievement tests more commonly used for program evaluation.

Sustained gain and total program effect not measured

Although most students are dropped from title I in the early grades and before they have reached the average achievement level of their classmates, few school districts have attempted to follow the students' progress to see whether their title I experience has any sustaining effect. School officials tend to view and manage their title I programs as annual efforts, rather than as a series of integrated units designed for cumulative impact on the students' academic success. None of the districts in our review had analyzed the cumulative effect of consecutive years of title I assistance

on the rate of student achievement gain. Similarly, the districts had not attempted to follow students after they were released from title I to see whether the projects had any lasting effect on student achievement, dropout rates, attitudes toward school, or other factors.

Some impetus has been given to the measurement of sustained gain by the Education Amendments of 1978. ESEA title I now requires local project evaluations to include measurements of achievement over at least a 12-month period at least once during each 3-year period. School districts are required to use this information by considering the inclusion of project components designed to sustain student achievement beyond the school year in which the projects are conducted.

Program efficiency and cost effectiveness not considered

Only one school district we visited had attempted to analyze the cost effectiveness of the various title I projects offered in its schools. Education officials testified that funding limitations have caused school districts to exclude many eligible students or terminate their title I services. Measures of cost effectiveness could help school officials determine whether their projects are efficient in comparison with other schools and districts or with exemplary projects.

Agency actions to improve evaluations

ED has focused substantial effort on improving title I evaluations. In compliance with a requirement originally added to ESEA in 1974, section 151 of Public Law 93-380, ED developed evaluation models and standards for use by State and local educational agencies. On October 12, 1979, final regulations were published specifying models for evaluating the effectiveness of title I projects providing instructional services in reading, language arts, or mathematics. ED's three evaluation models were developed to provide reliable data on program accomplishments. The models were also designed to permit the aggregation and comparison of project results, even though the school districts use different kinds of tests.

In 1976, 10 regional Technical Assistance Centers were established under contract to ED to provide evaluation technical assistance when requested by States and their local school districts. The Centers were established to assist States and, at the discretion of the States, local districts in implementing the title I Evaluation and Reporting System and in dealing with other title I matters. The Centers' function is to improve, through training and consultation, State and local capability for performing title I evaluation. Technical assistance focuses attention on the evaluation models and reporting forms included in the title I evaluation

system. Training consists primarily of evaluation workshops requested by the States, intermediate service units, or school districts. Consultation is provided to facilitate the actual implementation of one or more of the title I evaluation system components in site specific situations. The Centers also provide assistance in data utilization and quality control, such as adherence to testing dates, accuracy in completing forms, score conversions, data analysis, and data aggregation.

NETWORK DATA ON EXEMPLARY PROJECTS NEED IMPROVEMENT

Readily available information on Network exemplary projects often does not show the projects' effectiveness based on (1) the developers' experience or (2) the experiences of schools that have adopted the projects. The absence of convincing data on the merits of exemplary projects has contributed to school officials' opposition to adopting exemplary projects.

Moreover, the impact of the Network on title I projects may be overstated because the Network's accounting for the number of adoptions for title I projects includes adoptions that did not take place and adoptions for other than title I projects.

Data on the merits of exemplary projects inadequate

A brief summary description of each Network project is included in a catalog entitled "Educational Programs That Work." The catalog, issued annually by the Network, includes the name and telephone number of the project director, who can be contacted for further information. However, ED officials stated that their experience with the Network was that few decisions to adopt a Network project were made as a result of reading printed materials. According to ED, a study found that most decisions to adopt an exemplary project are made as a result of representatives from a school district either visiting a project to see it in operation or attending an awareness conference and talking with the project's developer.

Most school officials we interviewed believed that the Network's exemplary projects were not superior to their school's title I projects. Available Network literature about the exemplary projects frequently lacked convincing data to establish their superiority. Without such data it is questionable whether school officials who were not already interested in a project would visit the project or attend an awareness conference concerning it. Although project developers provide information demonstrating their projects' effectiveness to the Joint Dissemination Review Panel, that information is not usually made available to prospective project adopters.

Our review of the catalogs and other Network literature showed that

- data on sustained achievement gain were available for only 1 of the 21 exemplary title I projects,
- literature for 6 projects was devoid of any cost-effectiveness data, and
- information on student behavior and attendance was not available for 18 of the 21 projects.

Local title I officials at 34 school districts told us that one reason they had not adopted exemplary title I projects was that they could not evaluate whether the projects were suitable for their districts. Officials of 13 of the districts told us that the literature distributed by the Network and the developer-demonstrators on exemplary projects was not convincing. For example, officials of one district said they considered adopting an exemplary title I project but decided against it because the limited information available about project results was insufficient to convince them that the project would be better than what they had. District officials hoped to see a record of the exemplary projects' effectiveness over a period of years.

Even some of the school districts that adopted exemplary projects complained about the adequacy of information concerning the projects. Officials at several of these districts told us that information they desired to see on the long-term effects of the exemplary projects on student learning performance was not available. One official stated that the limited information that was available before a project was adopted had made it difficult to convince school staff and officials to adopt the project.

Officials of another school that adopted an exemplary project said detailed information on projects had been difficult to obtain. They said that the information they were able to get on project effect, sustained growth and attitude, attendance, and behavior improvement was mostly unsubstantiated opinion.

Also, some State facilitators told us that, because of the lack of project data, they were not able to respond to school officials' questions about exemplary projects. Various State facilitator officials expressed concerns over the lack of

- data to determine which projects were best suited to particular school districts,
- data on the cost of operating some projects,
- data that would enable school officials to make project comparisons,

--data on project implementation requirements that would enable officials to assess their schools' abilities to implement the projects, and

--current data on projects.

Regarding the currency of data, our review of project literature that was dated disclosed that about one-fourth of the projects were presenting data 4 or more years old. In one case, student achievement data were 11 years old. ED officials told us that they generally did not obtain performance data for the exemplary projects after the year the projects were certified by the Joint Dissemination Review Panel. Nineteen of the title I exemplary projects had been presented to the panel before 1975. Consequently, current data had not been available to ED or potential adopters to demonstrate that the current project formats were producing the same exemplary results.

Feedback on effectiveness of
adopted projects not obtained

The Network has not routinely obtained information on the results achieved by the districts or schools that adopted exemplary projects. In our opinion, such information would be useful to the Network in promoting adoptions of exemplary projects by demonstrating that exemplary achievements can be replicated at adoption sites.

Although a major purpose of the Network is to encourage improvements through the adoption of exemplary projects, virtually the only information the Network had on past adoptions was a list of them. At the time of our fieldwork, the Network did not have a formal system to acquire information on the success or failure of title I project adoptions.

The Network director told us that the Network's efforts focused on getting schools to adopt exemplary projects. Followup activities were not considered a high priority, and little followup had been done. Officials of five State facilitators and six developer-demonstrators we interviewed indicated that they generally did not follow up to see what happened after a district or school agreed to adopt an exemplary project.

Our interviews with the five State facilitators disclosed that

--none could provide information on how adopted exemplary projects had affected student learning and achievement levels;

--four did not know whether some of the reported adoptions had been implemented;

- three believed a better followup system was needed to evaluate the results of past adoptions, but said that followup efforts on adoptions would require greater funding for additional staff;
- one said that with additional funds he could make evaluations of project quality, which are not now provided in the contract; and
- one said that, because his office has only two professionals, not much followup can be provided.

Most of the seven developer-demonstrators we interviewed also cited a need for better followup to evaluate the effects of adoptions and to assist in adoptions. However, only one developer-demonstrator had followed up to obtain data on the accomplishments of adopted projects. The Network published this information to publicize the impact of the adoptions. Officials of the other five developer-demonstrators indicated a serious lack of information about the results of prior adoptions. In this regard:

- Officials of four developer-demonstrators said they performed little or no followup and could not tell us how many adoptions of their projects were still in effect. Three of them were not sure whether all of their claimed adoptions had been implemented. In contacting 15 of the school districts that a developer-demonstrator reported had adopted projects, we found that 4 had never adopted the project and 2 had dropped the project. Officials of the developer-demonstrator were not aware of these six cases or the reasons the projects were not operational.
- An official of another developer-demonstrator told us that it asked all school districts adopting its project to provide student achievement data for use in evaluating the success of adoptions. However, only 3 of over 140 adopting districts submitted the requested data. The official stated that the developer-demonstrator depends on the adopting schools to submit information voluntarily, since it has neither the time nor the staff to follow up. Unless the adopting schools contact it, the developer-demonstrator does not know if the project was dropped or even adopted.

Because of the importance of feedback data on project adoptions, some developer-demonstrators said the Network should provide greater emphasis and increased funding for periodic followup and for the evaluation of adoption results.

Several school district officials stated that the Network's lack of assistance for followup activities has adversely affected their adopted projects. According to these officials, the

Network's training and followup efforts were inadequate when proceeding through critical stages of the project. An official of one school district said that, if the Network wants to keep the adopted projects from being diluted and keep the "momentum going," the personnel of school districts adopting exemplary projects should be retrained periodically. Officials of two other school districts that had operated exemplary projects for 2 years without any support from the developers said they would like postadoption assistance, including access to material, techniques, and feedback from the developer.

The need for careful, thorough implementation of exemplary projects was emphasized by a 4-year ED-funded study of Federal programs supporting educational change. ^{1/} Although some successful replications were observed, the study concluded that

- successful projects were not disseminated easily,
- replication at new sites usually fell short of performance at the original sites,
- few projects were successfully implemented, and
- fewer survived in the long run.

Based on an analysis of the factors influencing the success of the adoption processes, the study reported

- implementing strategies can make the difference between success or failure,
- implementing strategies can determine whether teachers would assimilate and continue using project methods or allow them to fall into disuse,
- one-shot preimplementation training is ineffective, and
- extended training and classroom assistance from project staff are effective implementation strategies.

The study concluded that the inability of many school districts to implement and sustain program change ultimately frustrates the objectives of Federal education programs. Instead of concentrating only on the initial stage of the adoption process, the study recommended that the Federal role be expanded to subsequent adoption stages in order to assure the success and long-term institutionalization of adopted projects.

^{1/}"Federal Programs Supporting Educational Change, Vol. VIII: Implementing and Sustaining Innovations," RAND Corporation, 1978.

Better information needed to assess
the Network's impact on title I

Accurate information on the number of schools adopting Network title I projects would provide a more reasonable basis for determining (1) the extent to which the Network's projects are being used and (2) the need for any adjustments to increase the Network's potential for improving title I projects.

From its inception in 1974 through the fall of 1978, the Network approved and funded for dissemination 21 exemplary title I projects. The Network, however, has not determined how many districts and schools have adopted the 21 projects for title I projects. The Network received reports on adoptions of exemplary projects from its developer-demonstrators, but these reports did not provide an accurate basis for recording title I adoptions.

Developer-demonstrators frequently reported only the number of districts that adopted projects without indicating the number of schools adopting in each district; therefore, the Network did not know how many schools adopted a project in each reported adopting district. According to ED, most adoptions of exemplary projects are not for use in schools throughout the district and often are only for use in a single school. Reporting on a district basis tends to make the Network's reported accomplishments appear more extensive than actually is the case.

Also, developer-demonstrator reports did not provide assurance that reported adoptions actually occurred and were continued. Our followup on 36 adoptions recorded by State officials showed that 5 had not occurred and 4 had been discontinued. The Network did not adequately follow up to verify that districts and schools had adopted and continued to use exemplary projects as reported.

Moreover, as previously stated, reported adoptions of title I exemplary projects include adoptions for use in other than title I activities. Our followup of 87 adoptions that occurred in four States we visited showed that at least 59 were not for use in title I projects. While we do not question the desirability of using title I exemplary projects for other than title I projects, we believe that data on the Network's impact on improving title I projects should distinguish such adoptions from those that replace or modify existing title I projects.

These reporting errors resulted in the accumulation of unreliable information which limited its usefulness.

Network actions

To improve developer-demonstrators' followup on project adoptions, the Network in April 1980 revised its operating regulations to specify that grant applications for developer-demonstrators

will be examined to assess the extent that plans "show promise of effective postadoption monitoring and evaluation of program implementation and resulting benefits at the adoption sites."

The Network regulations, however, did not specify the nature of the monitoring and evaluation to be performed or the data to be collected during the postadoption visits. Network officials also pointed out that the current funding level of each developer-demonstrator is not sufficient to support all activities for which it could be responsible.

The revised Network regulations also provide that the Joint Dissemination Review Panel's approval of exemplary projects expires at the end of 4 years. Projects applying for the Panel's reapproval now must provide evidence that adoptions have attained the outcomes originally stated by the project developer. These requirements should make exemplary project data more current and provide data on the results of some project adoptions. The Network instructions, however, do not specify the nature or type of data to be submitted.

Revised instructions for fiscal year 1981 applications for Network developer-demonstrators specify that applicants seeking renewal of their grants must provide data on the results of their operations, including

- the number of students in direct contact with teachers that received services from the Network developer-demonstrators,
- the number of schools provided services by the developer-demonstrators, and
- an indication as to whether the adoptions have produced a significant impact.

These data will give the Network some measures of the developer-demonstrators' performance during the operating year. However, the reporting format does not indicate whether the adoptions are for title I projects. Consequently, the Network's impact on title I projects will remain unknown.

Whether the Network's revised regulations and instructions improve developer-demonstrator followup activity and produce data on the number and effectiveness of adoptions will depend on the extent to which the instructions are carried out. The Network's instructions do not detail how the followup and reporting should be accomplished. Also, it is not clear how the developers are to report the status of adoptions implemented in prior years.

CHAPTER 4

CONCLUSIONS, RECOMMENDATIONS,

AND AGENCY RESPONSE

CONCLUSIONS

Although many title I projects are improving the academic achievements of educationally disadvantaged students, some projects are not successful, and services for most students are terminated while they are still far below the academic achievement of their non-title I classmates. Some school districts have adopted exemplary projects for title I projects, but the number is too small to have much impact on the effectiveness of title I in meeting its goals nationwide.

Inadequacies in title I evaluations at the Federal, State, and local levels are contributing causes for the relatively few adoptions for title I projects. ED's title I evaluation and reporting system provides the methodology for evaluating the title I projects. However, ED has neither prescribed adequate criteria for State and local officials to use in determining the adequacy of their projects nor effectively monitored the States' title I administration. The State education agencies, in turn, have provided only limited monitoring of local project results. Local title I officials have seldom used project evaluations as a tool for project planning and improvement. Sometimes inadequate local evaluation methodology has limited the reliability and usability of evaluations for identifying project weaknesses. Under such circumstances, relatively few local school districts have sought to adopt exemplary title I projects.

ED's actions to implement the new evaluation models should help to improve the reliability and comparability of title I evaluations. However, project improvement depends on local school officials' receptivity to change. Given local school district officials' satisfaction with their title I projects (see p. 23) and their tendency to seek information that supports their positive views and ignore information that does not, few school districts are likely to adopt exemplary projects. Consequently, unless the States strongly emphasize using title I evaluations for project improvements, the Network is unlikely to have much impact on improving title I projects.

A paucity of information about the capabilities of exemplary projects and the results achieved by schools adopting such projects also has led local school officials to believe these projects are no better than their own. School officials would be more likely to adopt exemplary projects if more comprehensive information were provided about the merits of such projects and the results achieved by schools that adopt the projects.

Because implementing educational practices is a complex, difficult process, we believe systematic followup of adoptions is needed to determine whether adopting school districts have successfully implemented the projects. In the past, a serious shortcoming has been the Network's lack of a systematic followup program to ensure that (1) projects are properly installed and operating in the manner the developer believes is necessary for success and (2) additional assistance is provided when the projects are faltering. Revised Network instructions emphasize the need for monitoring and evaluation at the adopting sites and providing data on project outcomes. The instructions, however, do not specify the nature of the evaluation and monitoring to be performed or the data to be provided. Accordingly, the instructions' value will depend on how aggressively the Network pursues compliance.

A more extensive followup program at schools adopting Network projects would improve the accuracy of the data on the number of adoptions. Improved data would help the Network assess the interest in its projects and the need for improvements in its operations.

RECOMMENDATIONS

To improve the procedures for identifying and correcting title I project weaknesses, the Secretary of Education should

- provide substantially increased guidance and technical assistance to State and local school officials in developing criteria for assessing the effectiveness of title I projects;
- expand ED's monitoring efforts for assessing whether State education agencies are (1) meeting their responsibilities to evaluate the effectiveness of local title I projects and (2) helping local school districts to improve their title I projects;
- direct State education agencies to (1) assess the validity of procedures used by local school districts to evaluate their title I projects, (2) prescribe corrective measures where evaluation procedures are inadequate, and (3) help local school officials use evaluations for detecting and correcting project weaknesses; and
- advise State education agencies to encourage local school officials to use Network assistance in improving ineffective and inefficient title I projects.

To convince potential adopters of the merits of exemplary projects, the Secretary of Education should

--direct the Network to provide complete, comparable, and current information about the capabilities of the Network's exemplary projects, including (1) their impact on scholastic achievement, student behavior, and sustained growth, (2) their costs, and (3) the results of past adoptions by other schools.

To provide more accurate data on the volume of title I adoptions of exemplary projects and ensure that adoptions are successful, the Secretary of Education should make sure that the Network's developer-demonstrators

--provide accurate data on the number of adoptions and the schools affected,

--determine whether the projects have been installed correctly and are functioning properly, and

--provide for additional implementation assistance where needed.

AGENCY RESPONSE AND OUR EVALUATION

In a draft of this report, we proposed that ED prescribe specific criteria for State and local officials to use in assessing the effectiveness of title I projects. In its April 21, 1981, response to our draft (see app. III), ED disagreed with our proposal.

ED said there is no legal requirement to provide criteria for determining what levels of performance are satisfactory. Section 183(f) provides that ED title I evaluation models must specify objective criteria for use in evaluating title I programs and outline techniques for producing data which are comparable on a statewide and nationwide basis. ED contends that, under this provision, it is required to provide criteria or standards to help school districts choose methods by which they can evaluate their title I projects. ED believes that its October 12, 1979, title I evaluation regulations provide models and technical standards for evaluating title I projects and that this satisfies the statutory requirement to provide evaluation criteria.

However, we believe that ED's obligation in fulfilling its requirements does not end with the publication of evaluation models and technical standards. ED should place increased emphasis on providing technical assistance at the State and local levels in developing criteria for assessing the effectiveness of title I projects. This would be consistent with ED's longstanding policy of nonintervention in the programmatic decisionmaking process at the State and local levels.

According to ED, implementation of the title I evaluation system will permit local school districts to assess their title I achievement gains on the same metric or scale and therefore permit States to review results across school districts. ED said that national aggregation will enable State and local education agencies to view the levels of their gains in light of the ranges of gains reported nationally. Additionally, we believe that ED should use the national, regional, and district level information that it collects to provide increased guidance to State and local officials concerning criteria for assessing the effectiveness of title I projects, and we have revised our recommendation accordingly.

ED agreed with the other recommendations in this report. Its comments are discussed below.

Expand monitoring efforts for
assessing State evaluations and
assistance to school districts

ED agreed with our recommendations and said that it places a high value on the States' responsibility to evaluate the effectiveness of local title I projects and to provide assistance to local school districts to improve their title I projects.

ED pointed out that during fiscal year 1980 its reviews of State education agency activities devoted greater attention than in past years to title I evaluation and that it intends to continue this effort to ensure that States and local education agencies meet title I evaluation requirements as well as to improve the quality and use of evaluations at State and local levels.

According to ED, it reviews annually the States' administration of title I, assessing how well they are meeting their evaluation responsibilities and recommending actions to improve their overall administration of title I.

Direct State education agencies
to improve the validity of
evaluations and assure their use
in improving title I projects

ED concurred and suggested that the thrust of our recommendation was being met through

--ED reviews of State administration of title I, which include recommendations, as needed, for improving evaluations;

- implementation and use of ED's prescribed evaluation models and standards; and
- the evaluation services available to State and local education agencies through the regional Technical Assistance Centers.

These efforts should help improve the validity of local evaluations and make them more usable in identifying and correcting project weaknesses. However:

- Reports on ED reviews in the States we visited seldom indicated that evaluation procedures had been reviewed, and none of the reports we reviewed made recommendations for correcting inadequate or improper evaluation procedures.
- Evaluation procedures were technically unsound in many districts we visited (including districts which had professional evaluators and had implemented the required evaluation models).
- The Technical Assistance Centers do not have the authority or the capability to monitor and correct local evaluation efforts. They can advise State and local education agencies only when help is requested. They cannot conduct the evaluations, perform the analyses, or interpret the evaluation results for the States. The Centers operate in a supporting role, not one of supplanting State and district responsibilities for completing their annual evaluations.
- Technical Assistance Center reports suggest that the Centers do not have the capacity to provide all the assistance needed by the local school districts. For example, one Center reported that it had provided assistance to less than 32 percent of the districts in its area as of September 30, 1979. Another Center reported that States should be encouraged to have a backup system for training local school district officials in evaluation to supplement the Center's workshops.
- State monitoring of local title I projects has been compliance oriented and has been ineffective in assuring the validity of local evaluations. This problem was strongly suggested by the widespread use of inappropriate and faulty evaluation procedures in the districts we visited.

Accordingly, we believe that ED needs to strengthen its efforts to ensure that State education agencies are properly carrying out their evaluation responsibilities.

Encourage the use of the
Network for title I projects

ED agreed with our recommendation and stated that exemplary title I programs disseminated by the Network should be included in each State's repertoire of strategies for improving teaching and learning in title I schools. ED said that chief State school officers, State title I coordinators, and State facilitators should encourage title I districts to examine exemplary title I programs diffused by the Network for possible solutions to their school improvement problems. According to ED, this encouragement should give school district representatives opportunities to meet face-to-face with the developers of many exemplary programs. This process, according to ED, gives district representatives opportunities to examine materials and ask questions about evaluation results, installation costs, program philosophy, and training requirements.

ED plans to continue its efforts to encourage State education agencies to work with local education agencies to assess the effectiveness of local title I programs, improve local projects through the adoption of exemplary projects, encourage local education agencies to critique their own results, and consider the adoption of exemplary projects.

ED believes encouraging school officials who are not satisfied with their programs to attend awareness conferences will increase the rate of title I adoptions. ED will continue to work with State education agencies to stimulate interest on the part of local education agencies to analyze results of their current projects and to consider adopting exemplary projects, if appropriate.

Provide complete, comparable, and
current information on Network projects

ED agreed with our recommendation and stated that, as required by Network regulations, by 1984 for each project to retain its exemplary status, project data must be submitted to the Joint Dissemination Review Panel documenting that the results are still outstanding, that there have been adoptions of the project, and that the results achieved at the adopting sites are also outstanding.

ED said that the use of title I evaluation models by all local education agencies will result in Panel submissions with uniform comparable evidence of achievement impact. ED added that the Panel has established a format for submission of both new projects and those being revalidated which contains a specific format for reporting data on project startup and operating costs.

ED pointed out that, although sustaining achievement gains over time is one aspect to be considered in reviewing the impact of an exemplary project, the methodological problems in conducting a longitudinal study are considerable. However, ED believes that some evidence of sustained effects will be available from each exemplary project as part of its resubmission to the Panel.

ED claimed that potential adopters raise few questions about project evaluation results and doubted whether the publication of "more elaborate and costly information" about programs will result in major increases in the number of adoptions. However, ED concurred that every exemplary project should make information available concerning project results and agreed that the one-page descriptions in the "Educational Programs That Work" catalog can be improved to provide more information.

Strengthen followup of exemplary project adoptions

ED agreed with our recommendations. ED said it plans to make greater use of the developer-demonstrators to monitor claimed adoptions in each State, to gather information on adoptions (including achievement results), and to maintain contact with adopting sites. ED added, however, that the current funding level of each developer-demonstrator is not sufficient to support all of the activities for which a developer-demonstrator could be responsible in all 50 States. The Network is attempting to provide this support within its funding limitations. ED said it is placing much more emphasis on the quality of the implementation and the persistence of installations than was done in the Network's early years. Also, the number of developer-demonstrators funded by the Network is being reduced so that the average level of funding can be increased slightly to make additional resources available for monitoring and followup implementation assistance where needed. ED plans to require more information in the future from each developer-demonstrator concerning the status of adoptions in order to strengthen and maintain the linkage between developer-demonstrators and school districts that adopt projects.

According to ED, it recognizes the value of involving the developer-demonstrator as an active participant in the adoption process and followup, and the developer-demonstrators currently maintain contact with their adopting sites by telephone and site visits. ED stated that, when resubmitting for Joint Dissemination Review Panel approval before 1984, each developer-demonstrator will have to include achievement data from five adopting sites reflecting the diversity of sites which have adopted the project.

ED stated that the Network collects accurate data on the number of adoptions, the number of schools, and the number of teachers and students participating in the adoptions during the

reporting period but does not collect data on which adoptions are title I projects or the number of title I schools affected. ED explained that, when the present adoption reporting forms were cleared, pressures to reduce paperwork and reporting requirements prevented the Network from collecting information on the numerous sources of funds, including title I funds, used to install Network projects. ED intends to request clearance from the Office of Management and Budget to collect information on the particular funding source used to adopt an exemplary project.

SELECTION OF SCHOOL DISTRICTSFOR SITE VISITS

We selected a judgmental sample of 47 local school districts in five States for site visits. These districts were visited to ascertain (1) whether local school districts have suitable data for assessing the need for title I program improvement, (2) what action districts take to adopt better title I projects, (3) what impact the Network has on improving the districts' programs, and (4) what improvements district officials believe are needed in disseminating information on exemplary projects.

The districts selected included a wide variety, ranging from very small to very large and from very rural to highly urbanized. Care was taken to ensure that the number of school districts reporting above average districtwide achievement scores approximated the number of districts reporting below average scores. Because title I was created to assist school districts affected by high concentrations of poverty, we did not select the more affluent school districts for site visits. For this determination, school districts having smaller than average proportions of low-income families for their respective States were not selected.

The sample of 47 school districts, which had a combined enrollment of about 1,400,000 students, included

- 6 large urban districts having enrollments over 50,000,
- 17 medium-sized districts having enrollments between 8,000 and 50,000, and
- 24 small districts having enrollments between 146 and 8,000.

The seven developer-demonstrators we visited were selected in consultation with Network officials to provide a range of experiences in terms of effectiveness and age of programs.

ANALYSIS OF THE READING ACHIEVEMENTGAINS OF TITLE I STUDENTSPURPOSE OF ANALYSIS

We analyzed title I achievement test scores in 14 school districts to (1) examine the effectiveness of the title I projects in meeting the needs of educationally disadvantaged students, (2) assess the needs for project improvement, and (3) compare local project results with reported exemplary project results to ascertain whether the potential benefits of adopting exemplary projects would be significant.

SAMPLE SELECTION

From the 47 school districts chosen for site visits (see app. 1), we selected 13 districts for detailed analysis of title I project ^{1/} achievement test results. To assure balanced representation, we considered school district size, geographical location, and degree of urbanization. We also considered the availability and quality of achievement test data. To improve the geographical balance, the sample of 13 districts was augmented by adding a district not included in the original 47. Our analysis of the 14 districts included about 16,500 students receiving title I services in approximately 340 schools.

The title I schools we analyzed were dispersed among the Nation's four geographic regions, ^{2/} as follows:

- Northeast: 96 schools, 5,887 students tested.
- Southeast: 14 schools, 349 students tested.
- Central: 46 schools, 1,494 students tested.
- Western: 184 schools, 8,793 students tested.

Seven of the school districts were in large cities having over 100,000 population, four were in smaller cities having between 10,000 and 100,000 population, and three were in rural areas. Four of the districts had enrollments of over 50,000 students, seven had enrollments of 8,000 to 50,000 students, and three had enrollments of under 8,000 students. Eight districts were in

^{1/}In some school districts, title I project funds are supplemented with State and local funds.

^{2/}We used the same regions defined in the National Assessment of Educational Progress.

counties having a low-income population of less than 17 percent, four were in counties having low-income populations between 16.7 and 22.3 percent, and two were in counties where more than 56 percent of the population was low income.

ANALYSIS METHODOLOGY

Using existing achievement test scores for individual students, we tracked the progress of 22 student sample groups in reading achievement for 3 to 4 years, depending upon the availability of records in each district. All 22 student samples were selected from grades emphasized in the districts' title I programs. In some cases, we traced the students' progress over a period of years into grade levels that did not provide title I services. All samples consisted of 100 percent of the students receiving title I reading assistance in the grade levels selected for initial analysis. Students joining these groups in higher grades during subsequent years of title I assistance were added to the sample from their time of entry into the project. For example, if the base sample consisted of all third grade title I reading students in school year 1975-76, a fourth grade student enrolling in title I reading in school year 1976-77 would be included in the sample from the time of enrollment. These additions were necessary to show project results based on all students served, rather than on repeat students only.

To determine the need for improvement in local title I projects, the following gains were computed for individual groups of students and their respective projects:

- In-program gains achieved by students during a school year while receiving title I assistance.
- Continuing in-program gains achieved by students over consecutive years of title I service.
- Sustained gain rates maintained by students after their title I assistance had been discontinued.

The achievement gain rates were analyzed to determine (1) whether the students were gaining or losing ground on their normal achieving peers in each school year, (2) the cumulative effect of consecutive years of title I assistance on student rates of achievement gain, and (3) the effect of discontinuing title I assistance on student gain rates.

Achievement gain measurement

Student achievement gains were measured by subtracting the pretest from the posttest achievement level for the period analyzed. Expanded standard (scale) scores were used. Average

gains for the projects were determined by aggregating and averaging the scores of students served, again using standard (scale) scores. Expected or normal gain was defined as the amount of gain that the average achieving student at the same age and grade level would achieve for the period of instruction.

Where school districts used tests prepared by different publishers within the several testing periods, we converted all test scores to expanded standard scores of the test battery used most frequently. This was accomplished using an intermediate metric or scale, common to the test scores being converted and the selected battery scores. The broadest category of reading scores (total reading) rather than subtest scores (e.g., vocabulary and reading comprehension) were used.

Limitations

The selected sample of 14 school districts is not large enough to enable us to project with a high degree of confidence that the results typify title I projects nationwide. However, our sample was carefully selected to assure a broad range of school district sizes and environments, and we believe the results of our analysis should be indicative of many of the Nation's school districts.

In the districts we analyzed, we reviewed the test data, checked score conversions, and considered the adequacy of such factors as norming periods of the tests. Because we used test data available in the school districts and could not test selecting, administering, and scoring, we cannot guarantee the total accuracy of the data.

The derived test results may reflect some achievement gain inflation due to gain score analysis and a statistical phenomenon known as "regression toward the mean," wherein students scoring well below the pretest mean tend to make artificially high gains from pretest to posttest when the same test score is used for student selection and pretesting. We believe, however, that the possible gain inflation due to this phenomenon was reasonably limited in our analysis because we followed the progress of students over several years and the same test score was generally not used for initial student selection and pretest measurement. In addition, in our opinion, testing was usually done within a reasonably close time to the test publisher's norming period.

ED expressed concern about our study's reliance on the grade equivalent metric or scale since it may be misinterpreted and can distort the measurement of achievement if misused. According to

a report prepared for the National Institute of Education 1/ on controversies in evaluating compensatory education, a basic problem in selecting a metric or scale is " * * * one of validity versus communicability; the more technically correct units are not necessarily those that are easiest to understand or directly relevant to decisionmaking." The report claims that all available metrics or scales have weaknesses in validity, communicability, or both. However, it states that none of the other metrics or scales has the same clarity and simplicity of meaning as grade equivalents. Accordingly, we reported achievement results in grade equivalents but used the more technically correct expanded scale score to measure academic achievement.

1/"Controversies in the Evaluation of Compensatory Education,"
American Institutes for Research, July 1977.



UNITED STATES DEPARTMENT OF EDUCATION
WASHINGTON, D.C. 20202

ASSISTANT SECRETARY
FOR ELEMENTARY AND SECONDARY EDUCATION

APR 21 1981

Mr. Gregory J. Ahart
Director, Human Resources Division
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Ahart:

The Secretary asked that I respond to your request for comments on your Draft Report entitled, "Greater Use of Exemplary Education Programs Could Help Improve Education for Disadvantaged Children."

The enclosed comments represent the tentative position of the Department and are subject to reevaluation when the final version of the Report is received.

While we concur with the thrust of all but one of the Report's recommendations, we wish to reiterate our concern about the study's reliance on a grade-equivalent metric, since it is a metric often misinterpreted. In fact, as stated on page 40 of the Report, GAO is aware that grade-equivalent scores are not appropriate for determining average achievement levels. Therefore, it is unfortunate that this metric was used.

We appreciate the opportunity to comment on this Draft Report before its publication.

Sincerely,

A handwritten signature in cursive script, reading "John H. Rodriguez".
John H. Rodriguez
Acting Assistant Secretary

Enclosure

GAO note: Page references in this appendix may not correspond to page numbers in the final report.

Comments of the Department of Education on the Comptroller General's Proposed Draft Report to the Congress Entitled, "Greater Use of Exemplary Education Programs Could Help Improve Education for Disadvantaged Children."

GAO Recommendation

To improve the procedures for identifying and correcting Title I project weaknesses, the Secretary of Education should prescribe specific criteria for State and local school officials to use in assessing the effectiveness of Title I projects.

Department Comment

We do not concur. The report claims that the Department has failed to provide States with adequate criteria for assessing Title I project quality and effectiveness, as required by law. This position is based upon the language in Section 151(f) of the Education Amendments of 1974, renumbered Section 183(f) of the Education Amendments of 1978, 20 U.S.C. 2833, which reads:

"SPECIFICATION OF OBJECTIVE CRITERIA.-
The models developed by the Commissioner shall specify objective criteria which shall be utilized in the evaluation of all programs and shall outline techniques (such as longitudinal studies of children involved in such programs) and methodology (such as the use of tests which yield comparable results) for producing data which are comparable on a statewide and nationwide basis." (emphasis supplied)

Our position is that the above-cited provision requires the Department to provide criteria or standards to assist the school districts in choosing methods by which they can evaluate their Title I projects. We feel that the final regulations on Title I evaluation procedures, issued by the Department on October 12, 1979, fully satisfy this statutory requirement. Those regulations include provisions on technical standards to be used by local educational agencies (LEAs) in evaluating their Title I projects, and provisions on the use of evaluation models.

GAO, however, reads the above-cited provision to require the Department to provide criteria for assessing the quality and effectiveness of Title I projects. We have researched the legislative history of the Title I evaluation provisions and found, contrary to GAO's assertion, no indication that Congress intended the Department to provide these kinds of criteria.

The Report goes on to criticize the Department for failing to provide criteria for determining what levels of performance are satisfactory and what levels are inadequate. Aside from the fact that there is no legal requirement for providing these criteria, to do so would conflict with the Department's longstanding policy on non-intervention in the programmatic decisionmaking process at the State and local levels. In fact, Section 432 of the General Education Provisions Act

prohibits the Department from exercising any direction or control over the programming and administration in the State and local agencies. The Department recognizes that different school districts have different needs and concerns, and therefore feels that such questions as "What is the satisfactory level of performance?" and "What is an effective Title I program?" are best answered by the State educational agencies (SEAs) and LEAs most aware of those needs and concerns.

ED has concentrated its activities on assisting SEAs and LEAs to conduct valid and ultimately usable evaluations of Title I projects. Our strategy has been evolutionary. Bearing in mind that the majority of Title I districts are quite small and probably do not have trained evaluators, we have concentrated our resources on fundamentals--identifying appropriate tests; administering, scoring, and analyzing the results accurately; correctly implementing an evaluation model; reviewing and interpreting the results; and, finally, making judgments about project components. After implementing the Title I Evaluation and Reporting System (TIERS) for several years, many SEAs and LEAs are beginning to monitor closely the patterns of results from their Title I evaluations. They are: (1) developing monitoring plans to review the particularly successful and unsuccessful projects, (2) asking questions relating to the implementation of projects that are extreme, and (3) beginning to identify strengths and weaknesses of their projects. We will provide technical assistance, as requested, to conduct process evaluations of unusually effective or ineffective projects, and to assist in identifying and disseminating effective local practices and identifying and correcting program weaknesses. Implementation of the TIERS will permit LEAs to assess Title I achievement gains of each Title I school and SEAs to review results across LEAs since the reporting metric will be uniform and the results comparable. ED's national aggregation will enable SEAs and LEAs to view the levels of their gains in light of the ranges of gains reported nationally.

The strategy ED has adopted does produce an interpretable measure of whether Title I projects are effective. Interpretation of results, however, should and does differ from site to site. The Title I evaluation models yield measures of achievement gain, i.e., how much Title I students gain above what would have been expected in the absence of Title I. A positive gain from an evaluation shows that a project has successfully increased the rate of growth of its participants. In theory, the larger the gain, the better the program. A negative "gain" indicates that the Title I participants are growing at a slower rate than their non-Title I, but similarly disadvantaged, peers. Specification of criteria to separate the satisfactory projects from the unsatisfactory projects is technically unsound, educationally indefensible, and an intrusion into the legal authority of the States and their local school districts.

GAO Recommendation

To improve the procedures for identifying and correcting Title I project weaknesses, the Secretary of Education should expand ED's monitoring efforts for assessing whether State education agencies are (1) meeting their responsibilities to evaluate the effectiveness of local Title I projects, and (2) assisting local school districts to improve their Title I projects.

Department Comment

We concur. ED places a high value on the State's responsibility to evaluate the effectiveness of local Title I projects and to provide assistance to local school districts to improve their Title I projects.

ED teams review annually each State's administration of Title I, assessing how well States are meeting their evaluation responsibilities and recommending actions to be taken by the SEA to improve its overall administration of Title I.

In preparing for their onsite monitoring visits the ED review teams examine State evaluation reports and a sample of local agency reports for compliance with evaluation requirements and to assess program quality. They also review Technical Assistance Center (TAC) reports which often suggest evaluation improvements to be made by the State. These are discussed with program and evaluation specialists in the SEA for the purpose of outlining team onsite strategies.

While visiting State agencies, the teams review evaluation practices, including technical assistance provided and the use made of local evaluations during the application preparation and approval process. At local agencies they review evaluation practices and discuss the use of evaluation results as a basis for program improvements.

On October 12, 1979, the final Title I evaluation regulations were published. ED review teams were thus able to assess State and local adherence to the standards and models contained therein. During FY 1980 ED reviews devoted greater attention than in past years to the area of Title I evaluation and their reports to the States reflect this increased attention. ED intends to continue this effort to insure that SEAs and LEAs meet Title I evaluation requirements as well as to improve the quality and use of evaluations at State and local levels. Also, for the fifth year now, the Title I TACs are assisting SEAs and their LEAs in improving the quality of evaluations of Title I projects and in using evaluation results for program improvement. This assistance takes the form of materials development related to needs assessment, student selection, testing, and product and process evaluation. In response to requests from SEAs and LEAs, workshops related to test selection, evaluation design, needs assessment, instructional decisionmaking, and evaluation are developed and presented.

The TAC services are provided free of charge to State and local education personnel to assist on a variety of Title I evaluation issues. As a result of the TAC services and the development of the reporting system, State and local education personnel are conducting more complete evaluations of their programs. These evaluations are of a continued higher quality because the system stresses evaluation data quality control and the TACs provide technical assistance to support this effort. The development of sustained gains evaluation at the local level is providing local personnel with data about the effect of Title I over a longer period of time than one year. SEAs and LEAs are devoting increasing attention to the area of process evaluation. This phase of evaluation provides contextual input into the instructional decision process. With this increased capacity, State and local education personnel are able to evaluate programs more effectively and use these data for program development.

GAO Recommendation

To improve the procedures for identifying and correcting Title I project weaknesses, the Secretary of Education should direct State education agencies to (1) assess the validity of procedures used by local school districts to evaluate their Title I projects, (2) prescribe corrective measures where evaluation procedures are inadequate, and (3) assist local school officials in the use of evaluations for detection and correction of project weaknesses.

Department Comment

We concur. As indicated in our response to the monitoring recommendation, ED teams review State administration of Title I, including site visits to a number of LEAs each year to observe local project operation. As appropriate, recommendations are made for SEA improvement in the area of evaluation.

In compliance with Section 151 of Public Law 93-380, the Education Amendments of 1974, ED developed evaluation models and standards for use by SEAs and LEAs. On October 12, 1979, final regulations were published specifying models for evaluating the effectiveness of LEA projects providing instructional services in reading, language arts, or mathematics. However, as early as 1978, although not yet federally mandated, approximately 5,500 school districts were in the process of implementing one of the models. The experiences of ED, the SEAs, and the LEAs in using these models were disseminated in a pamphlet entitled, "The U.S. Office of Education Models to Evaluate E.S.E.A. Title I: Experiences After One Year of Use."

In addition, the ten regional TACs prepare support materials to use in conjunction with their workshops and personal (onsite, telephone, written) consultations. Materials produced include topical papers (e.g., out-of-level testing); simulation exercises (e.g., test selection; reporting forms completion); checklists for implementing a particular model; handouts (e.g., test charts); and transparencies for use with an overhead projector.

The TACs keep the States aware of the availability of technical assistance through Regional Coordinating Council meetings, scheduled meetings with State contacts on an individual or group basis, and distribution of regional newsletters.

Any SEA or LEA may request services from ED or directly from its TAC. Assistance is often provided as a follow-up to ED review team findings and recommendations. ED will continue to support efforts in these areas.

GAO Recommendation

To improve the procedures for identifying and correcting Title I project weaknesses, the Secretary of Education should advise State education agencies to encourage local school officials to use the assistance available through the Network for improving ineffective and inefficient Title I projects.

Department Comment

We concur. Exemplary Title I programs disseminated by the National Diffusion Network (NDN) should be included in each State's repertoire of strategies for improving teaching and learning in Title I schools. Chief State School Officers, State Title I Coordinators, and State Facilitators should encourage Title I districts to examine exemplary Title I programs diffused by the NDN for possible solutions to their school improvement problems. Based upon previous studies, this encouragement should provide school district representatives with opportunities to meet face-to-face with the developers of many exemplary programs. This process gives district representatives opportunities to examine materials and ask questions about evaluation results, installation costs, program philosophy, and training requirements. ED plans to continue its efforts to encourage SEAs to work with LEAs to assess the effectiveness of local Title I programs, to improve local projects, as needed, through the adoption of exemplary projects, and to encourage LEAs to critique their own results and to consider the adoption of an exemplary project, as appropriate. Encouragement and guidance is provided to SEAs and LEAs through ED's annual national dissemination meetings, ED review team monitoring, and materials developed and distributed nationally. After examining several alternatives, the district can choose the program that best fits its needs and resources and arrange for staff training. Of course, not all districts will find programs in the NDN to fit their needs and may have to turn to other sources.

GAO Recommendation

To convince potential adopters of the merits of exemplary projects, the Secretary of Education should direct the Network to provide complete, comparable, and current information about the capabilities of the Network's exemplary projects, including (1) their impact on scholastic achievement, student behavior and sustained growth, (2) their costs, and (3) the results of past adoptions by other schools.

Department Comment

We concur. A brief summary of this information is included in the program description in Educational Programs That Work, a publication issued annually by the NDN program. Also included in the publication is the name and telephone number of the project director. A telephone call or letter can be used to obtain additional information about a program. In addition, all of this information can be obtained face-to-face from the developer of an exemplary program during ED or SEA-sponsored awareness conferences. The SRI International evaluation of NDN found that most decisions to install an NDN exemplary program are made as a result of representatives from a school district either visiting the program to see it in operation, or attending an awareness conference and talking with the developer of the program. We will continue to promote national and State level awareness conferences so that developers and interested LEA representatives can meet face-to-face.

As required by the NDN regulations, by 1984 for each exemplary project to retain its exemplary status, project data must be submitted to the Joint Dissemination Review Panel (JDRP) documenting that the results are still outstanding, that there have been adoptions of the project, and that the results achieved at the adopting sites are also outstanding. Use of the Title I evaluation models by all LEAs will result in JDRP submissions with uniform, comparable evidence of achievement impact. The format for submissions to the JDRP, both for new projects and for those being revalidated, is established by the JDRP and contains a specific format for reporting data on project start-up and operating costs.

The Title I statute (P.L. 95-561, Section 124(g)) requires each LEA to examine during each three-year period the sustained effects of Title I services. ED has developed and the TACs are disseminating alternatives for LEAs to employ to meet this requirement and to use the results for project improvement. Although sustaining achievement gains over time is one aspect of project success to be considered in a review of the impact of an exemplary project, the methodological problems in conducting a longitudinal study are by no means trivial. However, some evidence of sustained effects will be available from each exemplary project as part of its resubmission to the JDRP.

Our experience with the NDN indicates that few decisions to install a program were made as a result of reading printed materials. Developer-Demonstrator project directors report that very few questions are asked by potential adopters about evaluation results obtained. We concur that every exemplary project should make this information available upon request, and we believe that the one-page descriptions in Educational Programs That Work can be improved to provide more information. However, if school officials in 41 out of the 47 school districts visited (87%) were satisfied with their Title I programs (page 36), we doubt that the publication of more elaborate and costly information about programs will result in major increases in the number of adoptions. Data on the effectiveness of the exemplary programs were available, but school officials apparently chose not to make inquiries. We do believe that encouraging school officials in the six districts out of forty-seven that were not satisfied with their programs to attend awareness conferences will increase the current rate of Title I adoptions. ED will continue to work with SEAs to stimulate interest on the part of LEAs to analyze results of their current projects and to consider the merit of adopting an exemplary project, if appropriate.

GAO Recommendation

To provide more accurate data on the volume of Title I adoptions of exemplary projects and insure that adoptions of the projects are successful, the Secretary of Education should make sure that the Network's developer-demonstrators' followups of project adoptions are successful in

- providing accurate data on the number of Title I adoptions and the schools affected,
- determining whether the projects have been installed correctly and are functioning properly, and
- providing additional implementation assistance where needed.

Department Comment

We concur. NDN does collect accurate data on the number of adoptions, the number of schools, and the number of teachers and students participating in the adoptions during the reporting period. It does not collect data on which adoptions are Title I projects or on the number of Title I schools affected. When the present reporting forms were cleared, pressures to reduce paperwork and reporting requirements prevented NDN from collecting information on the numerous sources of funds, including Title I funds, used to install NDN programs. We do intend to request from the Office of Management and Budget clearance to collect information on the particular funding source used to adopt an exemplary project.

We recognize as well the value of involving the Developer-Demonstrator (DD) as an active participant in the adoption process and follow-up. Using existing resources, ED plans to make greater use of the DDs to monitor claimed adoptions in each State, to gather information on adoptions (including achievement results), and to maintain contact with adopting sites over time. Presently, DDs maintain contact with their adopting sites by telephone and, if within the DD's State, by on-site visits. When resubmitting for JDRP approval prior to 1984, each DD must include achievement data from five adopting sites reflecting the diversity of sites which have adopted the project. The current funding level (approximately \$40,000) of each DD is not sufficient to support all activities in 50 States for which Developer-Demonstrators could be responsible, such as:

- ° participating in awareness conferences so that potential adopters can obtain information directly from the developer;
- ° conducting training for personnel in districts that have made commitments to install their program;
- ° monitoring the program after it has been installed; and
- ° providing follow-up technical assistance where needed.

NDN is attempting to provide these services within its funding limitations. Much more emphasis is being placed upon the quality of implementation and the persistence of installations than was the case in the early years of NDN. The number of Developer-Demonstrator Projects funded by NDN is being reduced so that the average level of funding can be increased slightly to make additional resources available for monitoring and follow-up implementation assistance where needed. In the future, ED will require more information from each DD on the status of adoptions. Thus, the linkage between DD and adopters will be strengthened and maintained.

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