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**Supplemental Educational Services:  
Overall Compliance with Requirements but  
Opportunities Exist to Improve Effectiveness**

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A report by the District Performance Auditor  
February 2010

**PORTLAND PUBLIC SCHOOLS  
PORTLAND, OREGON**





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**Richard C. Tracy**

District Performance Auditor

**Memorandum**

**To:** Board of Education  
**From:** Richard C. Tracy, District Performance Auditor  
**Date:** February 2010  
**Re:** Performance Audit – *Supplemental Educational Services: Opportunities to Improve Effectiveness*

Attached is my audit report on Supplemental Education Services at the Portland Public School district. The report assesses compliance with SES requirements and provider contracts, and identifies opportunities to improve service delivery to eligible students. The audit was performed in response to the 2009 Performance Audit Plan approved by the School Board.

I would like to thank the District management and staff for their assistance and cooperation in conducting this audit.

I look forward to meeting with you at upcoming Board and committee meetings to more fully discuss the report's findings and recommendations. Thank you for your ongoing support.

cc: Carole Smith  
Jollee Patterson



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# SUMMARY

**S**upplemental Educational Services (SES) is an element of the federal No Child Left Behind (NCLB) Act. Under provisions of the law, federal funds are provided to local educational agencies to help improve the academic achievement of low-income students at poor-performing schools through provision of after-school tutoring. This report evaluates the administration of the SES program at the Portland Public School (PPS) district.

Our review of PPS compliance with federal laws and regulations indicates that while there are some opportunities for improvement, the district has generally implemented the program consistent with the major requirements of the legislation. Specifically, the parents of economically disadvantaged low-income students at low-performing schools are given adequate notice and information to enroll in the program, and the district developed agreements with five private and non-profit providers to deliver after-school tutoring to 435 students at six middle and high schools in 2008-09. While less than 2 percent of PPS' total enrollment participates in the SES program, approximately 31 percent of eligible students enroll and participate. PPS spent \$591,045 in federal funds to provide SES services in 2008-09, approximately 3 percent of the district's total Title I allocation.

In addition, our assessment of SES provider compliance with their agreements with PPS indicates mixed compliance with contract provisions. As required by agreements, we found that providers monitor and supervise students, report frequently to parents and teachers, and conduct various assessments to measure student progress toward meeting tutoring goals. In addition, providers employ individuals with appropriate experience and education to conduct tutoring services. However, because providers do not receive sufficient input from PPS teachers, they do not prepare goal statements that are specific to each student's individual needs, particularly for special education students. Also, student goal statements are not always prepared and submitted on a timely basis, and the accuracy of provider invoices can be improved.

Finally, based on a review of national research and our statistical analysis of PPS middle school students, SES tutoring has a very modest measurable effect on improving participant academic achievement. While some studies have found no significant impact on improving math and reading achievement of participants, other studies have found a small positive impact. Our own assessment at PPS found that average achievement

gains were higher for SES participants compared to non-participants in both reading and math, although the differences were not statistically significant. Also, SES participants that completed 20 hours or more of math tutoring had statistically significant gains in math achievement compared to non-participants and to participants completing fewer than 20 hours.

Even though the potential effects of SES on student achievement may be small, there is some evidence that more controlled delivery of tutoring can, under certain conditions, have more positive impacts. Specifically, tutoring may have a higher likelihood of having a positive effect on student achievement if it is of sufficient duration, delivered to individuals or small groups, and focused on elementary and middle school students with significant academic deficits.

To help improve PPS compliance with federal regulations and provider compliance with contract agreements, we make several recommendations on page 35 of this report. In addition, to optimize the effectiveness of SES at PPS, we make several recommendations to change its focus and delivery. These recommendations would require changes in existing provider agreements and waivers from some of the federal provisions governing the SES program.



# INTRODUCTION

**T**his report provides an analysis of Supplemental Educational Services (SES) administered by the Portland Public School district. SES is an element of the federal No Child Left Behind Act (NCLB) of 2001. Under the provisions of the law, federal funds are provided to local educational agencies to help improve the academic achievement of low-income students at poor-performing schools through the provision of after-school tutoring. This report reviews PPS compliance with provisions of the federal law and regulations and assesses the compliance of tutoring providers with their agreements with PPS. In addition, the report evaluates the impact and effectiveness of the program in helping improve the academic performance of eligible student participants. A more detailed description of the report's objectives, scope, and methodology is presented on page 14.

## **No Child Left Behind and Supplemental Educational Services: Federal, state, and local agency responsibilities**

**T**itle I-A of the Elementary and Secondary Act (ESEA), as amended and reauthorized by the No Child Left Behind Act (NCLB), provides federal funds to help schools establish programs that will improve the educational opportunities of economically disadvantaged children. Title I funds are distributed to state education agencies which then allocate the dollars to school districts and their individual schools based on student poverty rates.

The NCLB Act established additional accountability for using federal education funds by requiring states and schools to improve student academic performance so that all students become proficient in reading and math by 2014. To measure proficiency, each state creates content standards, achievement tests, and proficiency standards. States are required to test children for reading and math proficiency to determine if schools are

making adequate yearly progress (AYP). In Oregon, children in grades 3 - 8 and in 10<sup>th</sup> grade are tested annually to determine if AYP is met. <sup>1</sup>

When Title I schools fail to meet AYP, the NCLB Act requires the implementation of specific interventions or sanctions. Interventions begin when schools fail to make AYP for the second year in a row and become more rigorous if schools fail to make AYP for six consecutive years. In the sixth year of failing to make AYP, schools are restructured, involving a major reorganization of staffing, governance and operation. Interventions prior to major reorganization include school choice options (student may choose to attend another school in the district) and supplemental educational services (SES), generally after school tutoring. The table below illustrates the timelines and interventions required under NCLB for schools not making adequate yearly progress.

**Figure 1 Required interventions for schools not making adequate yearly progress**

<b>Years not making AYP</b>	<b>Intervention</b>	<b>Status of school in next year</b>
1 <sup>st</sup> year	-	-
2 <sup>nd</sup> year	School choice	Needs improvement
3 <sup>rd</sup> year	School choice and SES	Needs improvement
4 <sup>th</sup> year	School choice and SES	Corrective action
5 <sup>th</sup> year	School choice and SES	Planning for restructuring
6 <sup>th</sup> year	School choice and SES	Restructured

Source: Government Accountability Office *No Child Left Behind Act*, August 2006

Students are eligible for supplemental education services if they attend a Title I school that has missed making AYP for three consecutive years and they are from low-income families. In most school districts, including Portland Public Schools, low-income students are identified by their eligibility for the federal free or reduced-priced lunch program.

<sup>1</sup> To achieve adequate yearly progress, schools must meet state goals by grade and subject for the overall school population and by designated groups including students who are economically disadvantaged, part of a racial or ethnic group, have disabilities, or have limited English proficiency. Schools must also meet specific standards for the level of students that participate in the testing process and for other academic indicators such as attendance and graduation rates.

Unless there are insufficient funds available to serve all eligible students, student assessment scores, grades, or academic achievement information are not considered when determining student eligibility for SES.

Supplemental educational services entail tutoring or other academic enrichment that is in addition to daily school instruction and is designed to increase the academic achievement of eligible students. SES may be provided by private companies, non-profit organizations, or local education agencies that have a record of effectiveness and that are capable of providing services consistent with the instructional program of the local school district. Providers are approved by the state educational agency and enter into agreements (contracts) with local school districts to provide specified services. Parents of eligible students are solely responsible for deciding if they want their children to participate and for selecting the state-approved provider to serve their children based on information provided by the local school district.

As shown in the table below, various parties have specific roles and responsibilities for the implementation of SES. The federal Department of Education is responsible for overseeing SES implementation, monitoring state educational agencies, and providing technical advice and assistance. State education agencies monitor local district implementation of SES, select and approve SES providers, and monitor the effectiveness of provider services. Local school districts communicate with parents, determine student eligibility, contract with providers, and encourage participation of eligible students. Providers deliver services in accordance with agreements with districts, monitor and measure student progress, and help students to attain achievement goals. Parents choose providers from a state-approved list.

**Figure 2 Primary roles of federal, state and local agencies for SES**

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Federal DOE	<ul style="list-style-type: none"><li>• Establish policies and provide funding</li><li>• Monitor implementation</li><li>• Advise and provide technical assistance</li></ul>
State department of education	<ul style="list-style-type: none"><li>• Receive and allocate federal funds to local districts</li><li>• Select and approve SES providers</li><li>• Monitor provider effectiveness</li><li>• Monitor local district implementation</li></ul>
Local school districts	<ul style="list-style-type: none"><li>• Notify and communicate with parents</li><li>• Identify eligible students and schools</li><li>• Enter into contracts with approved providers</li><li>• Monitor provider compliance with agreements</li></ul>
Parents of eligible students	<ul style="list-style-type: none"><li>• Select a provider from a state-approved list</li><li>• Provide support to children</li></ul>
SES providers	<ul style="list-style-type: none"><li>• Provide tutoring and other services to students</li><li>• Measure student performance and progress</li><li>• Carry-out SES agreement with local district</li><li>• Help students attain achievement goals</li></ul>

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Source: Auditor summary of NCLB Act provisions

## Supplemental Educational Services at Portland Public Schools

The SES program at PPS is administered within the Title I program of the Federal, State, and Strategic Grant Programs division, which reports to the Chief Academic Officer for Student and Academic Supports. The district's SES Coordinator is responsible for administering and monitoring the SES program under the direction of the Title I director. The SES coordinator communicates with parents, schools, and providers; manages recruitment and enrollment of eligible students in SES; develops agreements between PPS and state-approved tutoring providers; maintains records and program information; and monitors the operation of SES throughout the year. The SES coordinator is the primary liaison between parents and students, private and non-profit SES providers, and the teachers and schools where SES is offered. The SES organizational structure at PPS is illustrated below.

Figure 3 SES organizational structure

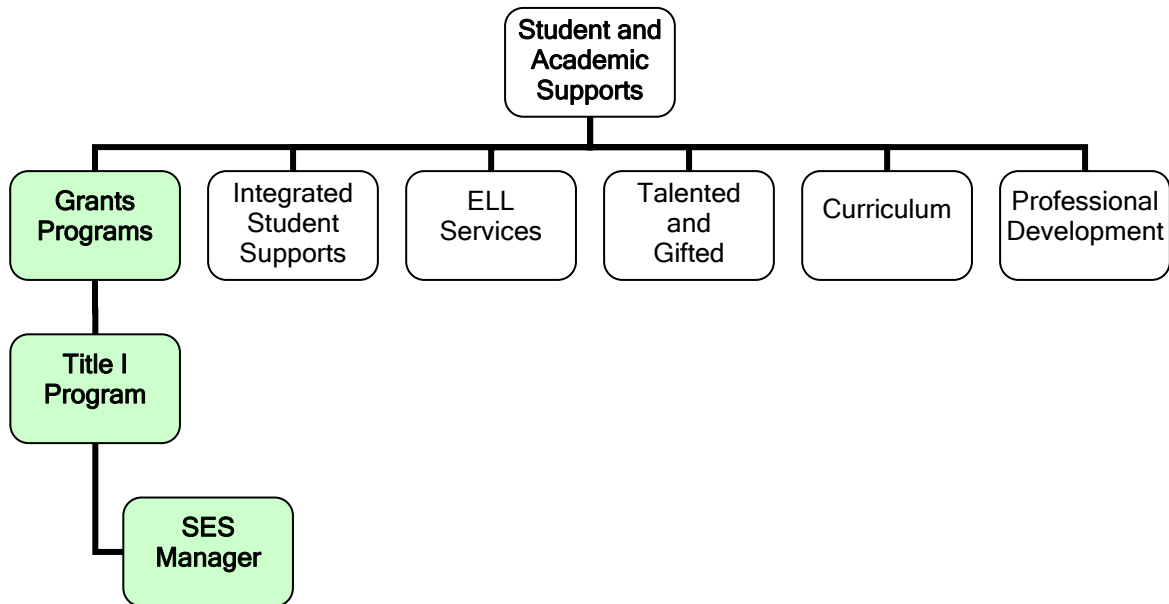


Figure 4 below shows the amount of Title I funding provided to the PPS district over the past five years and the amounts actually expended for SES services over the past four years. Actually spending has varied considerably over the past four years due to changes in the number of schools and students eligible for SES under NCLB requirements.

**Figure 4 Title I allocations and SES expenditures: 2005-06 to 2009-10**

	2005-06	2006-07	2007-08	2008-09	2009-10
<b>Title I allocation</b>	\$14.8 mil.	\$15.8 mil.	\$15.7 mil.	\$19.6 mil.	\$18.9 mil.
<b>SES expenditures</b>	\$526,626	\$823,820	\$342,231	\$591,045	n.a.

Source: PPS Title I-A financial analyst

The number of Title I schools in improvement status and the number of students eligible for SES at these schools has varied significantly over the past four years of the SES program. As shown in the following table, the number of PPS schools in improvement status that were obligated to provide SES has ranged from a low of one school in 2004-05 to a high of nine schools in 2008-09. During the current 2009-10 school year, 5 schools are required to provide SES to eligible low-income students. Similarly, the number of students eligible for and enrolled in SES has varied significantly from a high 2,520 eligible to a low of 264 eligible. Approximately 1,073 students will be eligible for enrollment in SES in 2009-10.

**Figure 5 SES schools, eligibility, and participation: 2003-04 to 2009-10**

	'03-04	'04-05	'05-06	'06-07	'07-08	'08-09	'09-10
# SES mandated schools	4	1	5	9	3	6	5
School names	Whitaker	Whitaker	George	George	George	George	George
	Jefferson		Lane	Lane	Lane	Lane	BIZTECH
	Marshall		Tubman	Binnsmead	Binnsmead	BIZTECH	ACT
	Roosevelt		Madison	Madison		ACT	POWER
			Ockley - Green	Ockley - Green		POWER	SEIS
				Gregory Ht		SEIS	
				Portsmouth			
				Kellogg			
				Tubman			
# SES eligible students	1,829	264	1,918	2,520	959	1,422	1,073
# eligible participating	494	193	489	1,213	232	435	n.a.
Participants as % of total PPS enrollment	1.0%	0.4%	1.0%	2.6%	0.5%	0.9%	n.a.

Source: Compiled by auditor from PPS enrollment reports and SES monitoring reports

The number of mandated SES schools and eligible students varies each year for a number of reasons. First, one school improved academic achievement by making adequate yearly progress in math and reading tests for all groups and was removed from the needs improvement list and, therefore, was not required to offer SES by the provisions of NCLB. Second, over the years several schools closed or were restructured into smaller or larger schools resulting in changing their status from a school in improvement status to a new school without a record of achievement proficiency and no mandate to provide SES. Finally, some high schools were effectively “defunded” from Title I eligibility by PPS by increasing the threshold of Title I funding eligibility from 50 percent of the students receiving free or reduced-priced lunch to 75 percent of the students receiving free or reduced-price lunch. (To offer SES services, a school must receive Title I funding.)

Although the percent of total PPS enrollment participating in SES is relatively low (averaging from 1 to 2 percent), the percent of SES eligible students that choose to participate is higher, ranging from a high of 73 percent in 2004-05 to a low of 24 percent in 2007-08. As shown in the table below, PPS has a higher percentage of eligible

students participating in SES than other Oregon districts and than national data available for 2003-04 and 2004-05. National studies also indicate that SES participation rates for eligible students have remained relatively low over the years that SES has been mandated by NCLB. Analysts point to several factors that may affect student participation in SES including low level of effort to market and communicate with parents about the availability of SES, diminishing levels of interest for higher grade students, and lack of access to convenient space to provide tutoring services.

**Figure 6 SES participation at PPS compared to Oregon and national participation rates**  
(percent of eligible students participating)

	<u>2003-04</u>	<u>2004-05</u>	<u>2005-06</u>	<u>2006-07</u>	<u>2007-08</u>	<u>2008-09</u>
PPS	27%	73%	26%	48%	24%	31%
Oregon	24%	46%	19%	19%	n.a.	12%
National estimate	18%	25%	n.a.	n.a.	n.a.	n.a.

Source: PPS rates compiled by auditor from PPS enrollment and SES monitoring reports. Oregon rates compiled by auditor from ODE enrollment and SES monitoring reports. National rates estimated by the US Department of Education.

In the 2008-09 school year, PPS had SES tutoring agreements with five providers: A+ Advantage Point Learning (Advantage Point), Club Z, Immigrant and Refugee Community Organization (IRCO), Open Meadow Alternative Schools (Open Meadow), and Sylvan Learning Center (Sylvan). Both Advantage Point and Club Z are for-profit tutoring companies that specialize in SES. Sylvan is also a private provider with a long history of providing center-based tutoring services. It also provides other Title I services at some district schools. IRCO is a non-profit organization which provides a range of services to refugee families. Open Meadow is also a non-profit organization that delivers SES as an element of its “Step Up” program of transition services for academically at-risk 9<sup>th</sup> grade students. Additional information on each of these providers is provided in Appendix A.

Each of the SES providers offers a slightly different tutoring approach. For example, Club Z is the only provider which offers one-on-one tutoring, while the others offer small group sessions with groups ranging in size from 5 to 8 students per tutor. Club Z also offers at-home tutoring, while most other providers tutor students on-site at their schools. Tutoring sessions are generally an hour but Open Meadow provides 90 minute sessions. Most providers offer tutoring 2-3 times per week. On average, SES participants at PPS receive 27 hours of tutoring instruction from SES providers. Advantage Point averages



21 hours per student, Club Z averages 33 hours, IRCO averages 25 hours, Open Meadow averages 28 hours, and Sylvan averages 22 hours.

In order to enhance enrollment, attendance and completion, SES providers can offer students incentives. During 2008-09, several providers offered students iPods, while others used more modest incentives such as bus passes and group parties.

As illustrated in Figure 7, Club Z had the most SES student participants at 163, followed by Advantage Point at 117, Open Meadow at 105, Sylvan at 40, and IRCO at 10 students. Club Z and Sylvan served students at each of the SES eligible schools, while Open Meadow focused services only at the high school level at the three Roosevelt small schools - ACT, POWER, and SEIS. IRCO primarily served students from the refugee community at George Middle School. The total number of student served by SES providers last year was 435.<sup>2</sup>

<sup>2</sup> PPS reported providing SES to 435 students in its monitoring report to ODE for 2008-9. Program data showed 452 students were served but those with no goal identified and some students who had only 1-2 sessions were excluded from the monitoring report.

**Figure 7 SES participants by tutoring providers: 2008-09**

	George MS	Lane MS	BIZ TECH (Marshall)	ACT (Roosevelt)	POWER (Roosevelt)	SEIS (Roosevelt)	TOTAL
Advantage Point	52	50	-	3	10	2	117
Club Z	56	34	37	2	10	24	163
IRCO	10	-	-	-	-	-	10
Open Meadow	-	-	-	38	30	37	105
Sylvan	21	12	2	1	3	1	40
<b>TOTAL</b>	<b>139</b>	<b>96</b>	<b>39</b>	<b>44</b>	<b>53</b>	<b>64</b>	<b>435</b>

Source: Auditor analysis of SES program data and eSIS student data

There were slightly more SES participants at the two middle schools than at the four high schools - 234 middle school participants compared to 231 high school participants. At the high school level, the number of participants declined by grade level, dropping from 96 students at 9<sup>th</sup> grade to 12 participants at 12<sup>th</sup> grade. George MS had the most SES participants at 139 and BIZ TECH the fewest at 39. SEIS at Roosevelt had the most SES participants of the four high schools required to provide SES.

**Figure 8 SES participants by grade and school: 2008-09**

	George MS	Lane MS	BIZ TECH (Marshall)	ACT (Roosevelt)	POWER (Roosevelt)	SEIS (Roosevelt)	TOTAL
6 <sup>th</sup> grade	56	34	-	-	-	-	90
7 <sup>th</sup> grade	50	34	-	-	-	-	84
8 <sup>th</sup> grade	33	28	-	-	-	-	60
9 <sup>th</sup> grade	-	-	7	25	29	34	96
10 <sup>th</sup> grade	-	-	15	14	11	23	63
11 <sup>th</sup> grade	-	-	12	3	7	4	26
12 <sup>th</sup> grade	-	-	5	2	6	3	16
<b>TOTAL</b>	<b>139</b>	<b>96</b>	<b>39</b>	<b>44</b>	<b>53</b>	<b>64</b>	<b>435</b>

Source: Auditor analysis of SES program data and eSIS student data

Demographically, more than three-quarters of SES participants in 2008-09 were from minority groups. Hispanic students comprised the highest percent of SES participants at 33 percent, followed by African-American at 28 percent, White at 24 percent, Asian at 13 percent, and Native American at 2 percent. Approximately 21 percent of the participants are English Language Learners and 21 percent are Special Education students on an Individual Education Plan (IEP). In terms of the tutoring subject selected by parents and students, 72 percent are enrolled in Math tutoring and 28 percent are enrolled in Reading tutoring.

**Figure 9 Ethnicity, program type, and tutoring subjects of SES participants: 2008-09**

	George MS	Lane MS	BIZTECH (Marshall)	ACT (Roosevelt)	POWER (Roosevelt)	SEIS (Roosevelt)	TOTAL
Asian	9%	21%	15%	14%	17%	2%	<b>13%</b>
African American	37%	14%	21%	23%	42%	28%	<b>28%</b>
Hispanic	29%	32%	33%	25%	19%	58%	<b>33%</b>
Native American	5%	1%	1%	2.3%	2%	-	<b>2%</b>
White	22%	32%	26%	36%	21%	12%	<b>24%</b>
ELL	20%	20%	15%	27%	8%	33%	<b>21%</b>
Spec Ed	25%	18%	13%	23%	23%	20%	<b>21%</b>
Math	68%	76%	95%	64%	62%	75%	<b>72%</b>
Reading	32%	23%	13%	36%	38%	25%	<b>28%</b>

Source: Auditor analysis of SES program data and eSIS student data

## Audit objectives, scope, and methods

This audit had four primary objectives as follows:

- to assess PPS compliance with state and federal laws and regulations pertaining to the administration and delivery of SES services
- to assess SES provider compliance with PPS contract agreements to provide tutoring services to eligible students in 2008-09
- to assess the adequacy of controls for reviewing, approving, and paying provider invoices for SES services
- to assess effectiveness of tutoring in meeting established performance goals and in improving student academic achievement

To address these objectives, we interviewed PPS managers and administrators, reviewed PPS policies and procedures, and obtained and analyzed SES program and financial records. We reviewed 2008-09 PPS SES contracts and the ODE Applications for each SES provider for that year. We obtained financial and accounting information from PPS grant accounting and contract information from the procurement division. We also worked closely with the SES coordinator to obtain information on SES participant attendance, academic goals, and provider agreement provisions for 2008-09. We interviewed representatives from each of the SES providers (Advantage Point, Club Z, IRCO, Open Meadow, and Sylvan) to learn about service provision methods, student achievement measurement methodologies, staff ratios, and tutor qualifications. In addition, we met with and communicated with representatives from the Oregon Department of Education to obtain background information on federal and state requirements for administering and implementing SES. In order to assess effectiveness, we obtained from PPS' Research, Evaluation, and Assessment Department student enrollment, demographic, and achievement data for 2007-08 and 2008-09 for all eligible students at SES schools in 2008-09. Most of this student data was extracted from the PPS student information system, eSIS. We also conducted extensive review of academic studies, federal audits, and other research on the impact of SES on student achievement and on tutoring as a method to improve student achievement. Finally, we reviewed monitoring reports on PPS prepared by the Oregon Department of Education and the federal Department of Education to evaluate findings and corrective actions.

This audit was conducted in accordance with the 2009 Audit Plan approved by the PPS School Board. It was performed during the months on September, October, and

November of 2009. I was assisted on this audit by an independent performance audit consultant, Kathryn Nichols.

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



# AUDIT RESULTS

**T**he Portland Public Schools district follows federal laws and regulations in managing and administering the Supplemental Educational Services program of NCLB. While compliance can be improved in a few areas, the district complies with the essential features of laws and regulations regarding parent notification, services to low-income students, use of federal funding, and development of provider service agreements. Providers also generally comply with the provisions of their agreements with PPS but opportunities exist to improve monitoring practices, the timeliness and content of student goal statements, and accuracy of provider invoices. Further, SES goals and services are not always specific to individual students and their needs.

In addition, SES appears to have a relatively minor, and often insignificant, impact on improving student achievement in Math and Reading. While SES is designed to raise the achievement of disadvantaged students attending low-performing schools, various studies and evaluations show that SES at best has a very modest positive effect on participating students compared to similar students not receiving SES. Nevertheless, there is evidence that the effectiveness of after-school tutoring can be optimized by increasing the duration of tutoring, using one-on-one or small group sessions, and focusing efforts on elementary and middle school students with significant academic deficits.

## **PPS compliance with federal requirements**

**B**ased on our review of the SES program administered by the Portland Public Schools, we found that the district complies with most of the major requirements of the federal law. Specifically, parents are given adequate notice, information, and opportunity to enroll students; low-income students from schools in improvement status are served; sufficient resources are set aside to provide SES; and contract agreements with providers are complete. The district, however, should make efforts to fully comply with new regulations regarding the reallocation of unused SES funding and the inclusion of SES information on the district website. In addition, more effort should be taken to verify that all students enrolling in the program are low-income during the year of

SES tutoring. Finally, PPS should take steps to ensure that SES participants with disabilities receive appropriate services by providing additional information to providers.

**Parent notification of the availability of SES.** PPS makes effort to notify parents of SES and to encourage participation. The SES coordinator helps identify eligible students at SES schools and sends notices to parents in August with follow-up information in September. In prior years, provider representatives were invited to open houses at each school so that parents could obtain information on SES providers. The coordinator develops information on all providers and has made this information available at open houses and at eligible schools (see Appendix A). Provider information includes details on staff to student ratios, tutoring schedules, cost-per-hour, approximate number of sessions, staff qualifications, service location, and a provider-reported effectiveness measure. In addition, PPS has two enrollment periods, one in October and the other mid-way through the academic year.

We were told by SES provider representatives that compared to other districts in Oregon, PPS does the best job in administering the SES program and encouraging participation. Although the providers would like to have more marketing to promote SES participation, they consistently reported that the SES coordinator does a very good job of working with providers and schools, and is very supportive of the SES process.

However, PPS has failed to post data on SES on the district website as required by federal regulation. Specifically, the district did not post data in 2008-09 on the number of eligible and participating students or a list of SES providers for that school year. This information is intended to provide parents with current information on their options for SES tutoring and can help parents make decisions about their child's participation.

**Eligible low-income students enrolled.** The SES coordinator reviews the eligibility status of each student that applies for SES to determine whether they qualify to receive free or reduced-price lunch and that they are attending a school that has failed to make adequate annual yearly progress for at least three years. She obtains the listing of free or reduced-price lunch students from the district's Nutrition Services from the previous year because an updated list of eligible students is not available at the time of SES enrollment. As shown on Figure 5 on page 9 of the Introduction, 1,422 students were eligible for SES in 2008-09 and 435 students participated.

Our review of data obtained from Research, Evaluation, and Assessment on low-income students in 2008-09, however, shows that 18 students that received SES in 2008-09 were potentially not eligible for free or reduced-price lunch and, therefore, may not have been eligible for SES services. At the completion of our audit we were unable to determine with certainty if some or all of these students were eligible or ineligible for SES



services in 2008-09. Some students may have been enrolled in the program due to their free or reduced-price lunch status in the previous year and others may have had errors in their student ID or name spelling that made confirmation difficult.

**Services provided to students with disabilities.** Federal regulations stipulate that eligible SES students with disabilities should have equal opportunity to participate in SES and that they receive appropriate accommodations. When applicable, the SES provided must also be consistent with the student's individualized education plan or individualized services plan.

As illustrated in Figure 9 on page 13, 92 of 435 (21%) SES students served in 2008-09 were identified as special education students. We found no evidence that SES eligible students with special needs or disabilities were unable to access SES services if desired. However, we were told by several providers that despite requests for information on the educational needs of special education students enrolled in tutoring, little information was provided by teachers or schools on the educational needs of these students to ensure SES tutoring was consistent with individualized education plans. The SES coordinator told us that arrangements have recently been made to allow providers to have limited automated access to student data to determine if students have individualized education plans or 504 plans. This information should help providers determine which students might need special accommodations or instruction. To better facilitate provider access to this information, the 2009-10 SES enrollment form contains a place for parents to give consent to release information on special education and 504 plans for their children.

**Sufficient resources set aside for SES.** To ensure that local education agencies spend sufficient amounts on school choice and supplemental educational services, federal regulations require that unless a lesser amount is need to meet demand, local agencies must spend an amount equal to 20 percent of the annual Title I-A allocation provided to the district. However, PPS has never had sufficient demand for school choice or SES to reach the 20 percent level since the beginning of NCLB implementation, therefore, PPS has spent significantly less than 20 percent of its Title I-A allocation. As shown in the table below, PPS has consistently spent significantly less on SES services than set-aside for SES services in each of the past four years. School choice set-asides and actual spending for school choice also show a similar pattern of under-expenditure.

**Figure 10 Amounts set-aside and spent for SES: 2005-06 to 2008-09**

	2005-06	2006-07	2007-08	2008-09
20% of Title I-A for SES and Choice	\$2,960,309	\$3,159,104	\$3,149,922	\$3,924,375
Actual SES set-aside	\$740,077	\$1,003,680	\$787,500	\$1,000,000
Actual SES spending	\$526,626	\$823,820	\$374,402	\$591,050

Source: Compiled by auditor from financial and accounting information obtained from PPS Title I financial analyst

Despite the consistent low demand for school choice and SES, PPS management makes a commitment to meet the possibility of increased demands in the annual Budget Narrative/Spending Worksheet submitted to the Oregon Department of Education each year. Specifically, it commits to meet all school choice transportation demands up to required levels using general fund resources and commits to meet all required SES demands from other Title I-A resources if the demand increases beyond the set-aside levels.

When districts do not face sufficient demand for school choice or SES, federal guidance prior to 2008-09 permitted local agencies to spend the additional amounts on other allowable activities or to carry the unspent funds over to the next year. In prior years, PPS either carried over unspent funds to the subsequent school year or spent unused school choice and SES allocations on other allowable Title I-A activities such as AYP school support efforts or summer school for low-income children. Although PPS has not needed ODE approvals to reallocate Title I-A school choice and SES amounts in the past, new federal guidance requires such approval beginning in the current fiscal year. In addition, the guidance also requires local districts to meet more rigorous criteria before reallocating unexpended amounts for other activities in a given school year. One criterion will require additional effort to meet. Specifically, PPS must maintain records to demonstrate that it has partnered to the extent practicable, with faith-based organizations, community based organizations, or business groups to help inform eligible students of their families of the opportunities to transfer to new schools or to receive SES.

**Agreements with providers are complete.** Upon selection of a state-approved SES provider by parents, the local school agency must enter into an agreement (contract) with the provider to provide SES to eligible, enrolled students. The federal law requires the agreement to include at a minimum several specific elements. Our review of PPS agreements with five providers in 2008-09 school year indicates that each of the

agreements contain all the specific elements identified in the law. Each provider agreement includes specific information on 1) student achievement goals, 2) measurement tools for measuring progress, 3) a statement that goals should be aligned with individualized education plans and services, 4) methods for provider communication with parents and teachers, 5) provider termination provisions, 6) provider payment provisions, and 7) prohibitions on disclosure of student information. Although the timetable for goal achievement is not explicit, it is assumed that goals will be achieved by the end of the planned sessions.

## SES provider compliance with PPS agreements

Our review of SES providers in 2008-09, indicates mixed compliance with the provisions of their agreements with PPS. These agreements also require providers to meet the terms of annual ODE applications, which we also reviewed. We found that providers monitor and supervise student attendance at tutoring sessions and provide regular reports to parents and teachers. Providers also conduct various types of pre- and post-assessments to evaluate student progress in meeting goals. In addition, providers ensure that individual tutors have sufficient educational background and experience, and procedures are in place for criminal background clearances for SES tutors.

Although providers develop student achievement goals for most SES participants, goals are not specifically tailored to each student but are generalized goals that apply to all students served. In addition, providers do not provide student goals statements to the SES coordinator until the end of the year rather than within 30 days of enrollment, and from 12 to 15 percent of the students served in 2008-09 lacked goal statements. Further, student goal statements are developed with minimal input from teachers and little consideration of special education and 504 plans because teachers generally do not give providers feedback on the academic needs of individual SES participants and tutors are rarely informed about individualized education plans or services. In addition, it is difficult to determine whether provider tutoring curricula are aligned with Oregon content standards. As a result, PPS must rely on ODE to ensure that each provider curriculum is consistent with Oregon standards during the provider application approval process.

**Attendance and monitoring.** We found that provider reporting on student attendance is timely, complete, and reasonably reliable. Each provider submits an automated Monthly Participation Summary to the SES coordinator that is based on attendance rosters maintained at each school to record student arrival and departure times for each day the

tutoring is provided. The SES coordinator periodically visits each school tutoring site to determine whether daily rosters are completed as required. Monthly Participation Summaries provided to the SES Coordinator are reviewed and then summarized for the year. Based on our review of the Monthly Participation Summaries submitted by each provider, SES students attend about 88 percent of the sessions they are scheduled to attend. As shown in the table below, attendance varies a little month to month, dipping to 84 percent in December and January and increasing to 94 percent in April.

**Figure 12 SES participation summary for 2008-09**

	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>TOTAL</b>
<b>Students served *</b>	269	267	275	375	361	352	238	4	<b>452</b>
<b>Students dropped</b>	0	12	18	34	27	37	73	13	<b>201</b>
<b>New students</b>	270	4	21	115	20	21	2	0	<b>183</b>
<b>Students exited/completed</b>	0	1	2	17	53	157	228	14	<b>458</b>
<b>Sessions scheduled</b>	1,372	1,465	1,010	2,542	2,692	2,098	1,777	8	<b>12,956</b>
<b>Sessions attended</b>	1,269	1,274	849	2,138	2,334	1,887	1,661	8	<b>11,412</b>
<b>Attendance rate</b>	93%	87%	84%	84%	87%	90%	94%	100%	<b>88%</b>

\* Student served differs from previous tables because it includes students not reported to ODE because of incomplete data or because they only attended 1 or 2 sessions.

Source: Auditor analysis of SES program data

Attendance rates by each provider also vary. Open Meadow reports the highest participation rate at 98 percent, followed by Club Z at 91 percent, Sylvan at 88 percent, Advantage Point at 83 percent, and IRCO at 80 percent.

The SES coordinator collects a significant amount of data from SES providers on student attendance, goals and progress. Overall, these reports allow the coordinator to monitor compliance with the many provisions of the contracts with providers. Providers told us that they find the process much more extensive than other Oregon districts but it is workable and appropriate. However, we noted a number of inconsistencies in the reported data, specifically, data from one worksheet that did not square up with data from another worksheet, spreadsheet formulas did not always compute correctly, and the number of students served, exited, and dropped were not always consistent from month to month. We believe that most of these inconsistencies are likely provider input errors.

Nevertheless, these data problems did not affect payments to providers or significantly affect reported participation.

We also believe that the current reporting system could be streamlined and its reliability improved if the SES coordinator moved to a relational database tool rather than using multiple spreadsheets. Developing a more reliable and efficient data management approach is especially critical given that the workload has increased significantly this year due to the increase in the number of approved SES providers this school year. A relational data base tool would also improve overall monitoring by PPS of provider activity and annual reporting to ODE.

**Parent and teacher communication.** Federal law and PPS agreements require that SES providers maintain regular contact with teachers and parents of SES participants. Our review of monthly reports provided to the SES coordinator on provider contacts indicates that providers make regular and frequent updates to parents and teachers on the progress of students. The table below shows that providers communicate with parents and students by mail, telephone calls, school inbox, and in-person. Average monthly contacts with parents range from a high of 20 (Sylvan) to a low of 2.5 (IRCO). Average monthly contacts with teachers range from 8.0 (Open Meadow) to 2.1 (IRCO).

As will be discussed in a subsequent section of this report, providers reported to us that communication is largely a one-way street. They reported receiving minimal if any feedback from parents, and especially from teachers, on student needs, satisfaction, or progress.

**Figure 13 Type and frequency of provider contact with parents and teachers: 2008-09**

	PARENT communications			TEACHER communications		
	Frequency	Type	Average contacts	Frequency	Type	Average contacts
<b>Advantage Point</b>	monthly	mail	4	monthly	inbox	4
<b>Club Z</b>	monthly	mail	2.7	monthly	mail	2.7
<b>IRCO</b>	quarterly	mail/phone	2.5	quarterly	mail	2.1
<b>Open Meadow</b>	2 or more	person/phone	6.8	weekly	meetings	8
<b>Sylvan</b>	daily reports	via student	20	monthly	inbox	4.2

Source: Auditor analysis of PPS SES program data

**Tutor qualifications and tutor/student ratios.** The minimum qualifications for tutors working for SES providers are specified in their applications to ODE and in the agreements with PPS. Generally, tutors are required to have four-year degrees, teaching or tutoring experience, and, for some providers, teaching certification.

Our review of the resumes for those tutors providing SES to students in 2008-09 showed that most providers are employing tutors with four year degrees and some teaching or tutoring experience. As shown in the table below, 87 percent of tutors had a four-year degree, 89 percent had at least one year of teaching or tutoring experience, 24 percent were certified teachers, and 11 percent had less than a four-year degree. In our view, provider tutors are meeting the minimum level of qualifications stipulated in ODE applications and PPS agreements. However, providers do not give documentation of tutor qualifications to the SES coordinator prior to contracting with the district as required by the state-approved application. We had to request resumes from each provider to analyze tutor qualifications. In addition, we found procedures are in place to ensure that SES tutors complete PPS criminal background checks.

**Figure 14 SES provider qualifications**

	Resumes received	Certified	Teaching or tutoring experience	4-year degree	Less than 4-year degree
<b>Advantage Point</b>	4	1	3	3	-
<b>Club Z</b>	17	6	16	17	-
<b>IRCO</b>	1	1	1	1	-
<b>Open Meadow</b>	15	0	11	10	5
<b>Sylvan</b>	10	3	10	10	-
<b>TOTAL</b>	<b>46</b>	<b>10</b>	<b>40</b>	<b>40</b>	<b>5</b>

Source: Auditor analysis of resumes obtained from SES providers

Providers also reported to us that they often maintain a lower tutor to student ratio than stipulated in agreements with PPS. As shown below, our comparison of PPS contract agreements to oral testimony obtained during interviews with provider representatives shows that most providers either meet tutor/student ratio levels or are slightly lower than contracted levels.

**Figure 15 SES provider student to tutor ratios**

	Specified by contract	Reported by providers
<b>Advantage Point</b>	5 to 1	5 to 1 (or smaller)
<b>Club Z</b>	1 to 1	1 to 1
<b>IRCO</b>	8 to 1	3 to 1
<b>Open Meadow</b>	5 to 1	8 to 1 (maximum); 5 to 1 (typical)
<b>Sylvan</b>	8 to 1	5 (or 6) to 1

Source: SES provider agreements and actual ratios reported to auditors by providers

**Student goal statements and timetables for improving achievement.** A critical part of PPS agreements with SES providers are the individualized goal statements for each student participant. These goal statements are intended to provide a specific contract between the district, tutor, and parent for the provision of services to eligible students. The goal statements include the name and address of the student, the subject of tutoring, an assessment of pre-tutoring skill level, interim and ending goals, duration, location, and length of session, and communication plans with parents, district, and teachers.

The agreement between PPS and each of the providers also stipulates the following requirements:

- Create achievement goal statement for each student with input from teacher and parent
- Goals must be based on an evaluation of achievement
- Insure goals are aligned with individual education plans (relates to students with disabilities and special education needs)
- Submit standard goal statement to PPS within 30 days of first day of participation
- Stipulate time, date, and times services are to be provided
- Develop timelines and performance measures for meeting goals
- Submit standard goal statement to PPS within 30 days of first day of participation

We obtained all of the Goal Statements for students enrolled in SES at PPS during the 2008-09 school year and found the following:

Student goal statements were submitted late and some were missing. Goal statements are an important tool for establishing tutoring service levels and assessing goal achievement. We found that goal statements are submitted at the end of the year rather than within 30 days of student enrollment. Additionally, we could not locate goal statements for 12 to 15 percent of students participating in the SES in 2008-09.

Goal statements are not individualized for each student. Student achievement goals are standardized and generic. Each student taking a specific subject from a provider has the same goals and achievement target - a grade level improvement or a percent increase in a pretest score. There is little evidence that student goal statements are informed by parents and teachers input and feedback so that specific levels of need, accommodations, and achievement potential are factored into the development of an individualized goal for improvement. Based on discussions with providers, they are also not made aware if students have special educational needs because IEP and 504 plans are not provided or discussed by the schools or teachers.



## Controls over SES provider payments

Portland Public Schools maintains complete accounting records on the resources and expenditures of the Title I-A SES program. Provider invoices are obtained, reviewed, and approved on a timely and consistent basis, and sufficient segregation of duties exist between the review, approval, recording, and contract payment functions. However, we also found PPS needs to establish additional controls to ensure providers do not exceed maximum annual payment per student and that providers do not invoice PPS for unallowable services.

**Maximum annual payment per student.** In accordance with federal regulations and the contract agreement between PPS and SES providers, the maximum billable amount per student for tutoring services in 2008-09 was \$1,593. For all but one provider, monthly invoices for services includes a column for the year-to-date billing for each student based on actual attendance and session duration. However, we noted in a review of February 2009 invoices that several students had billable amounts slightly exceeding the maximum allowable amounts. Although we were told that the provider reimbursed PPS for overcharges, better controls over invoice reviews could help eliminate possible over-billing in the future.

**Allowable billable services.** Although the SES coordinator told us that providers can only bill for actual tutoring time, it appears that one provider may also be billing for preparation, snacks, and informal discussions with students, while another provider bills for lengthy sessions to prepare students for exams and state testing. Because the contract agreement between PPS and providers does not clearly specify what services are allowable and unallowable items, providers lack clear criteria for what services are allowable billable services. Additional specificity in agreements should address this weakness.

## Effectiveness of SES tutoring in improving student achievement

**D**etermining the effectiveness of SES in improving student achievement is a fundamental question that has been addressed by a number of studies and evaluations. While a few studies found some positive but marginal impact on math and reading achievement, other evaluations were unable to document any significant positive effects due to student participation in SES. Our own assessment of SES participants and non-participants at PPS showed that achievement gains were higher for middle school students participating in SES compared to non-participants, but the differences were statistically insignificant. Gains in math achievement were more significant when students participated in 20 or more tutoring sessions. In addition, we believe that provider methods for assessing SES participant goal achievement provide an unreliable and inadequate picture of the success of their programs.

Despite these results, tutoring as a tool to improve student achievement has been shown to have positive results under more controlled conditions with certain students. Specifically, tutoring has a higher likelihood of having a positive effect on student achievement if it is of sufficient duration, used with individual students, focused on elementary and middle school students, and especially with students with significant academic deficits. However, the ability of PPS to control the implementation of the SES program to create these conditions is constrained by the provisions of federal legislation and regulations governing the SES program. Nevertheless, given the potential for improved tutoring effectiveness under certain conditions, we believe that PPS could pursue efforts to modify existing agreements with SES providers and/or pursue waivers to existing federal and state provisions to create more flexibility in the implementation of SES at PPS.

**Summary of evaluations of SES effectiveness.** Over the past several years, a number of studies and evaluations have been conducted to assess the impact of SES on improving the academic achievement of disadvantaged students at low performing schools - a central goal of the NCLB legislation. (See Appendix B for bibliography.) Although the legislation gives state governments the primary role for monitoring and evaluating the effectiveness of SES provider tutoring, most states, including Oregon, have been slow to establish rigorous and comprehensive evaluation approaches to identify with confidence the effectiveness of SES providers. Consequently, most of what we know about SES effectiveness comes from evaluations conducted in a few states and in several individual school districts. The US Department of Education has funded a few evaluations of SES at selected school districts around the country but they have yet to conduct a comprehensive assessment of SES nationwide or draw conclusions about the impact of SES on student academic achievement.

Our review included state evaluations in Tennessee and Louisiana, as well as local school district evaluations in Milwaukee, Minneapolis, Chicago, and Los Angeles. SES was not found to have a significant impact in improving math or reading achievement in Louisiana, Tennessee, Milwaukee, or Minneapolis. SES evaluations in Chicago and Los Angeles found statistically significant effects on achievement but the overall magnitude of the effects were relatively small. The largest and most rigorous evaluation has been conducted by the RAND Corp using data from 9 large urban districts (Baltimore, Chicago, Denver, Long Beach, LA, Palm Beach, Philadelphia, San Diego, and Washington DC). The RAND study found modest but statistically significant effects of SES on math and reading achievement in 7 of the participating districts - equivalent to increasing an average-performing student's percentile score from about 50 percent to about 53 percent. Overall, results of evaluations show very modest measurable effects on tutored students compared to demographically matched comparison students.

Several of the studies found that effectiveness is improved under certain conditions and controlled implementation settings. For example, SES evaluations in Chicago found that SES students participating for more than 30 to 40 hours annually had greater gains than non-participants and students making the greatest gains were those who were farthest behind academically. Other studies have found that the magnitude of SES impact on improvement gains is greater for students with disabilities and for elementary students with the greatest academic deficits. In addition, other research suggests that SES may have other benefits beyond achievement gains on state assessment tests such as improved motivation, better learning and study habits, and lower drop-out rates.

Confounding the research on SES effectiveness are the other factors that may have a stronger effect on student learning than after-school tutoring. Factors such as teacher effectiveness, school leadership, competing interventions and school reform efforts, and special reading or math programs all may have more influence on improving the achievement of low-income students in low performing schools than tutoring.

**Auditor assessment of SES participants and non-participants at PPS.** In order to test the relationship between SES participation and academic achievement gains at PPS, we analyzed whether annual achievement gains on Oregon state assessment tests differed for 2008-09 SES participants compared to SES eligible non-participants. The District's Research, Evaluation, and Assessment Department analyzes these annual "RIT" gains for each school (broken down by grade and benchmark category) in order to evaluate school-wide progress in improving student achievement. While gains vary by grade, subject, and benchmark category, we were advised that they generally expect the typical student to gain an average of 4 points from one year to the next.

Demographic and achievement data was obtained from the PPS Research, Evaluation, and Assessment Department on all students enrolled in the fall or spring of 2008-09 at a SES mandated school and eligible for free or reduced-price lunch at anytime during the school year. This data was merged with the SES program data. Because state testing is done annually only through the 8<sup>th</sup> grade (high school students are only tested once in 10<sup>th</sup> grade), only SES eligible middle schools students would have state test data for both Spring 2008 and Spring 2009. Therefore, we identified SES eligible students at Lane and George middle schools with two years of data, a total of 622 students for assessment of math achievement and 615 for assessment of reading achievement.<sup>3</sup>

Based on our review of achievement gains from 2008 to 2009 for SES eligible participants compared to SES eligible non-participants at Lane and George middle schools we found the following:

- Overall, average achievement gains were higher for SES participants compared to non-participants in both reading and math. But the differences were not statistically significant.
- For SES eligible students who did not meet state test benchmarks in Math in 2008, SES participants were more likely to meet Math benchmarks in 2009 than non-participants with low math achievement (36 percent met versus 28 percent met). However, once again, the differences between participants and non-participants were not statistically significant.
- Because of the research documenting the impact of tutoring intensity on effectiveness, we also controlled for the number of sessions completed in subject specific-areas. We found that SES participants who completed at least 20 or more tutoring sessions in Math showed gains of 6.7 points in math, compared to 4.8 point gains for non-participants (including those that completed less than 20 hours of SES tutoring). These differences were statistically significant. Similarly, among the students who did not meet State benchmarks in math in 2008, 60 percent of those completing at least 20 SES

<sup>3</sup> Approximately 22% of the SES eligible students at Lane and George middle schools did not have test data for both years and were excluded from the analysis. The level of missing test data was consistent at both schools and did not appear to be correlated with demographic subgroups or achievement levels. One limitation of our analysis is that we did not statistically control for differences between participants and non-participants that might have impacted achievement, such as motivation or other school initiatives. However, we did control for prior achievement, which is probably the most critical control variable. We used the .05 threshold for assessing statistical differences between groups.

sessions in Math met benchmark in Math in 2009. The comparable rate for non-participants was 24 percent.

- Reading participants did not show significant gains in reading achievement compared to non-participants, even using the 20 session minimum as the measure of participation.
- We also performed these analyses on each of the school populations separately. We found that SES participants at Lane Middle School who completed 20+ hours of Math tutoring showed very impressive gains in math, again statistically significant. For example, the average annual gain for participants was 7.5 points, compared to 4.0 points for non-participants. Comparable differences for students at George were not, however, statistically significant.

The statistical results of these analyses are included at the end of this report in Appendix C.

**Limitations of SES provider assessment of participant goal achievement.** As discussed previously in this report, federal law and provider agreements with local school districts require providers to establish individual achievement goals with students participating in tutoring sessions and to develop a method for measuring student progress in achieving the goals. Providers are relatively free to choose the types of assessment tests to be used and the desired targets for student achievement. SES providers in the PPS district have used various pre and post assessment tests that are intended to measure student progress over the course of the tutoring during the school year. Each provider has also established standard goals for those participants that are able to complete all tutoring sessions. At the end of each year, providers report to PPS on the number and percent of students that have successfully achieved established goals.

As shown in the table below, the five SES providers use a variety of assessment tools and have established a number of goals to measure student success. Advantage Point and Sylvan use nationally normed assessments, The Group Reading and Mathematics Assessment & Diagnostic Evaluations (GRADE and GMADE), and California Achievement Test, 5th Edition (CAT5), respectively. Club Z used RLI/MLI in 2008 -09 but plans to use GRADE and GMADE in the future. IRCO used Basic Achievement Skills Inventory (BASI), 2008-09 and Open Meadow used state ODE assessments test results.

To measure student success, Advantage Point has a goal of a 10 percent increase on one of the two pre-test scores for those students completing all planned tutoring sessions. Sylvan expects students to increase the equivalent of .2 grade levels (approximately 2

months of expected developmental progress for the typical student) and Club Z expects students to increase the equivalent of .5 grade levels (approximately 5 months of expected developmental progress for the typical enrolled student). Open Meadow has a goal of a 4-point increase in State test scores for freshman SES participants and a 6-point increase for sophomores. Open Meadow is also the only provider that has specific and unique student goal targets for students with individual education plans. IRCO has not established specific quantitative improvement goals for its student participants relying instead on qualitative statements of success such as “Improve skills in problem solving ...”.

**Figure 16 SES provider assessment methods, goals, and sessions offered: 2008-09**

	Type of pre and post assessment	Standard achievement goal	Planned number of tutoring sessions *
<b>Advantage Point</b>	CAT 5	10% increase in CAT score	27 sessions (hourly)
<b>Club Z</b>	RLI/MLI	.5 grade level equivalency increase	29 sessions (75 mins.)
<b>IRCO</b>	BASI	(not quantitative)	40 sessions (hourly)
<b>Open Meadow</b>	Oregon state assessment tests (RIT gains)	4-point increase (freshmen); 6-point increase (sophomores)	21 sessions (90 mins.)
<b>Sylvan</b>	GMADE/GRADE	.2 grade level equivalency increase	27 sessions (hourly)

Source: SES agreements and auditor review of goal statements

\* Average number of tutoring hours actually received by all SES students in 2008-09 students was 27 hours. Advantage Point averages 21 hours per student; Club Z averages 33 hours per student, IRCO averages 25 hours, Open Meadow averages 28 hours, and Sylvan averages 22 hours.

Based on our review, we believe that the methods used by providers to measure and report on the success of students in SES tutoring programs may not provide a reliable, comparable, consistent, or valid picture of the impact of provider tutoring on improving student achievement. The major weaknesses in the measurement and reporting system are as follows:

- Not all students reported as successfully completing tutoring have completed both a pre and post assessment test
- Methods for assessing the success of participants failing to complete sessions are subjective and potentially unreliable
- Student achievement goals are not specific to individual students but are generalized goals for all participants
- Differences in measurement tools make comparisons of the relative effectiveness of providers difficult to determine
- Provider goals (targets) for increases in student achievement appear relatively low and unchallenging. For example, a .2 increase in grade level equivalency may be the result of the normal school year instruction rather than after-school tutoring
- Only one provider has individualized goals for students on IEPs
- Measurement tools used by providers vary in their quality and validity to identify student learning needs
- Parents lack understandable and complete information on the effectiveness of individual providers to make selection decisions

**Opportunities to improve tutoring effectiveness.** Despite the modest success of SES identified in various evaluation studies and in our assessment of PPS participants, tutoring implemented in more controlled settings than the current SES environment has been found to have strong positive effects on student learning. When implemented after-school in individual or small group settings, tutoring extends the amount of time available for learning and provides an opportunity for low-achieving students to catch up to their peers (Good and Brophy, 1987). A recent meta-analysis of 35 different studies (Lauer, et. al., 2006) concluded that the impact of tutoring may not be large enough to close the achievement gap but can have a positive impact on achievement particularly if the program offers a certain degree of intensity - more than 45 hours of service. This research also found greater positive impact in programs that use one-on-one tutoring for reading

and small groups for math. Other studies have demonstrated that tutoring, and SES programs in particular, has the greatest potential to be successful with elementary students and with students with large academic deficits and special education needs.

Given that after-school tutoring has been found to have positive effects on student learning under more controlled delivery, PPS could consider changing their approach to SES implementation to focus on those actions that might prove more likely to produce better outcomes for participating students. For example, PPS could optimize delivery of SES by establishing a minimum threshold of 40 hours per student, limiting sessions to one-on-one or very small groups, focusing on low achieving and special education students, and placing emphasis on elementary and middle school students.

However, the ability to pursue these changes is severely limited by the federal laws and regulations that prescribe how SES will be funded, administered, and implemented. As discussed in the Introduction, NCLB legislation and guidelines define eligibility to include all low-income students in low performing schools regardless of their academic deficits, special education needs, or grade level, and gives states the responsibility to select and approve providers of SES services in local school districts. In addition, local school districts have little authority to change session lengths, tutoring protocols, or student assessment measurement tools that state-approved providers employ unless they are able to obtain waivers from the federal and state governments to modify the prescribed delivery mechanisms. .



# CONCLUSIONS AND RECOMMENDATIONS

Overall, the Portland Public School district has complied with the essential features of the NCLB Supplemental Educational Services program and the SES providers have addressed the major provisions of their agreements with the district. Parents were adequately notified of opportunities for tutoring, providers offered tutoring in accordance with state-approved applications, and approximately 71 percent of students completed tutoring as planned. However, the district and providers should make additional efforts to comply with certain provisions of the federal regulations and provider agreements. In addition, PPS could improve the effectiveness of SES tutoring by exploring different approaches for delivering tutoring services.

In order to further improve PPS compliance with federal law and regulations, we recommend that PPS should:

1. Place SES information on the PPS website so that parents and other interested parties have more access to information on tutoring services offered by providers to increase participation.
2. Make more effort to give SES providers additional information on the educational needs of SES students that have special education needs so providers can tailor services and make accommodations to meet special needs.
3. Ensure that new regulations effective this fiscal year relating to reallocation of unused SES funding are fully addressed.
4. Review methods for identifying SES eligible students to ensure that only eligible economically disadvantaged students receive SES services.

In order to strengthen provider compliance with agreements with PPS, we recommend that PPS:

5. Implement data base software to more efficiently and effectively manage and monitor provider data on student enrollment, attendance, participation, and progress.
6. Develop better processes to ensure that student goal statements prepared by providers are timely, complete, and student specific. PPS management should encourage teachers to communicate with providers about the unique educational needs of student SES participants.
7. Clarify in provider agreements the specific types of activities that can be billed by providers in provision of SES services. More rigorous review of provider invoices should also help identify overcharges and billings for unallowable services.

In order to improve the effectiveness of the SES program, PPS should consider changing the current approach to SES implementation. However, these changes will require renegotiation of current agreements with SES providers and waivers from some of the existing federal regulations governing the provision of SES. Specifically, we recommend that PPS:

8. Encourage providers to increase the number of hours of tutoring instruction to at least 40 hours each year and provide Reading tutoring using one-on-one instruction and Math tutoring in small groups not exceeding 5 students to one tutor. PPS should consider allocating additional unused SES funds to support increased number of sessions.
9. Collaborate with Oregon Department of Education and Oregon providers to develop a common assessment tool to be used by all providers to assess achievement gains resulting from SES services at PPS.
10. Collaborate with teachers in low performing schools to encourage the parents of disadvantaged students with significant academic deficits to enroll their children in SES tutoring. Collaborate with Oregon Department of Education to explore options for giving more priority to those students in low performing schools that have significant academic deficits and special education needs.

11. Coordinate and collaborate with SES providers to develop specific achievement goals and timetables for completion for each student participant depending on their unique needs and academic achievement status.
12. Explore opportunities to implement pilot programs for the delivery of SES services at PPS that demonstrate optional delivery methods and more tailored and focused attention on students with greatest academic deficits. PPS would need to obtain approval from federal education authorities to pursue some of these new delivery methods.



# MANAGEMENT RESPONSE





## PORTLAND PUBLIC SCHOOLS

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**OFFICE OF THE SUPERINTENDENT**

**Carole Smith**  
Superintendent

February 2, 2010

Dick Tracy, Performance Auditor  
Portland Board of Education  
501 N. Dixon St.  
Portland, Oregon 97227

Dear Mr. Tracy:

Thank you for your analysis of the Supplemental Education Services (SES) provided by the Portland Public School district. The report identifies four “primary objectives” related to your examination of SES in Portland:

1. to assess PPS’ compliance with state and federal laws and regulations pertaining to the administration and delivery of SES services
2. to assess SES provider compliance with PPS contract agreements to provide tutoring services to eligible students in 2008-09
3. to assess adequacy of controls for reviewing, approving, and paying provider invoices for SES services
4. to assess effectiveness of tutoring in meeting established performance goals and in improving student academic achievement

The response to each objective discusses selected findings and addresses each audit recommendation related to that objective.

### **1. PPS’ compliance with state and federal laws and regulations pertaining to the administration and delivery of SES services**

#### *Federal and state laws and regulations limit PPS’ rights and responsibilities*

The report acknowledges that the rights and responsibilities of PPS and other local districts are limited to notifying and communicating with parents, identifying eligible schools and students, contracting with providers approved by the state, and monitoring providers’ compliance with their agreements with PPS.

It is important that we take those limitations into account when considering and responding to the audit results and recommendations.

#### *PPS has implemented SES consistent with the requirements of federal law*

We are pleased to see that the audit confirms and recognizes our efforts to notify parents about SES and encourage their participation, to review the eligibility status of each student who applies for SES, to ensure SES eligible students with special needs are able to access SES services, to set aside and provide sufficient funds to meet demands for SES and to ensure agreements with providers meet federal standards.

While the audit recognizes PPS' efforts to implement SES consistent with federal and state requirements, it also makes recommendations to improve PPS' compliance with federal law and regulations.

*Audit recommendations and management responses*

Recommendation: Place SES information on the PPS Website.

Response: PPS closed its second enrollment window for SES on January 29 2010 and all public information related to SES will be posted as soon as final data is verified. Past postings were delayed during an extended web page migration as the district implemented a new web platform for all departments.

Recommendation: Make more effort to give SES providers additional information on the needs of SES students with special needs.

Response: PPS is committed to ensuring that SES eligible students with special needs may access SES services tailored to meet those students' needs. We have taken steps to balance SES providers' needs for information with parents' rights to approve disclosures. Prior to the start of tutoring this year, the SES Manager modified the SES selection form so that parents may approve disclosures of student information to providers prior to the start of tutoring. She is also working with staff to develop a point of contact for SES providers seeking information about SES students who have special needs.

Recommendation: Ensure the new regulations effective this fiscal year relating to reallocation of unused SES funding are fully addressed.

Response: The Director of Funded Programs, in collaboration with the Director of Grants and Compliance and the Chief Academic Officer, is working to ensure that PPS' reallocation of unused SES funding is aligned to the new regulations.

Recommendation: Review methods for identifying SES eligible students to ensure that only eligible economically disadvantaged students receive SES services.

Response: The database selection and implementation discussed in detail below should help improve accuracy in determining which students are eligible for SES services. However, we believe it is better to err on the side of providing services. In an instance where there is a possibility that a student is eligible for services but data cannot be verified, we believe the correct assumption is that the student is eligible.

**2. SES provider compliance with PPS contract agreements to provide tutoring services to eligible students in 2008-09**

*The report indicates mixed compliance with provisions of the 2008-09 agreements*

We are encouraged that the audit finds that providers monitor, supervise and regularly report attendance at tutoring sessions. We are glad to see that SES providers are working to ensure that their tutors have the necessary educational backgrounds and experiences. It is important to note that a criminal background check is conducted for each SES tutor. We are pleased that page 22 of the audit report notes that SES providers find PPS' compliance monitoring process "much more extensive than other Oregon districts but it is workable and appropriate." We share the audit's concerns about generalized SES learning goals and that data collection and reporting systems need improvement.



*Audit recommendations and management responses*

**Recommendation:** Implement database software to more efficiently and effectively manage and monitor provider data.

**Response:** We agree. The SES Manager has already begun a process to review various databases that would improve the monitoring of providers' activities and student performance (including identification of students eligibility and needs, billing and statement of goals), to support annual reporting to the ODE, and to reduce paperwork. The SES Manager will conduct the database selection process in cooperation with PPS' procurement staff to ensure selection of the most effective product within PPS' procurement rules.

**Recommendation:** Develop better processes to ensure that student goal statements prepared by providers are timely, complete, and student specific.

**Response:** We agree that an SES tutoring plan is most effective when constructed with the cooperation of teachers and SES tutors. This year we will conduct a pilot program at King PK-8 school intended to identify and implement effective ways for teachers and SES tutors to jointly develop and prepare timely, complete, and individually specific student goal statements. The results will help inform the development and implementation of future agreements with SES providers.

**3. Adequacy of controls for reviewing, approving, and paying provider invoices for SES services**

*PPS maintains complete accounting records on SES resources and expenditures*

It is reassuring that the report acknowledges that PPS obtains, reviews and approves provider resources on a timely basis, and that "sufficient segregation of duties" exists "between the review, approval, recording, and contract payment functions." However, the audit finds PPS needs to establish additional controls to ensure providers do not exceed the maximum annual payment per student and that providers only invoice PPS for allowable services. For the reasons given in the management response below, we disagree in part with that finding.

*Audit recommendation and management responses*

**Recommendation:** Clarify in provider agreements the specific types of activities that can be billed by providers in provision of SES services.

**Response:** The audit notes in a review of February 2009 invoices that several students had billable amounts slightly exceeding the maximum allowable amounts. We consider this a one-time event that current PPS systems discovered and corrected. We believe our systems will discover and correct any similar, future occurrences. In addition, we believe that the database will support and enhance the current systems in place, ensuring that providers do not over-bill for the services they provide.

The report suggests that "the contract agreement between PPS and providers does not clearly specify what services are allowable" and that more "specificity in agreements should address this weakness." We agree such specificity is desirable and will review all future agreements to ensure that such specificity is included as possible.

**4. Effectiveness of tutoring in meeting established performance goals and in improving student academic achievement**

The effectiveness of SES is a fundamental question to this audit. The discussion in this section is timely and important because PPS is committed to strengthen tutoring opportunities for students, including tutoring provided by district staff and by partners and contractors.

*Audit recommendations and management responses*

Recommendations: Encourage providers to increase the number of hours of tutoring instruction to at least 40 hours each year and provide reading tutoring using one-on-one instruction and math tutoring in small groups not exceeding five students to one tutor.

Collaborate with the ODE and with Oregon SES providers to develop a common assessment tool.

Responses: We agree that such changes will require renegotiation of current agreements with SES providers and waivers from some of the existing federal regulations governing the provision of SES. At this time, there is no structure for working with the ODE to identify and obtain waivers or to develop common assessment tools that could inform SES contract negotiations. In August 2009, several districts from around the state including Portland offered to create an SES workgroup to address these issues under ODE guidance; however, this workgroup has not yet been convened. PPS will contact the ODE to find out if and how we might work with the ODE, other districts and SES providers toward those goals.

Recommendations: Collaborate with teachers in low performing schools to encourage the parents of disadvantaged students with significant academic deficits to enroll their children in SES tutoring.

Coordinate and collaborate with SES providers to develop specific achievement goals and timetables for completion for each student participant.

Explore opportunities to implement pilot programs for the delivery of SES services at PPS that demonstrate optional deliver methods.

Responses: As described above, this year PPS will conduct a pilot program at King PK-8 school to identify and implement effective ways for teachers and SES tutors to jointly develop and prepare timely, complete, and individually specific student goal statements. The results will help inform the development and implementation of future agreements with SES providers. We will also work with King teachers to encourage the parents of disadvantaged students with significant academic deficits to enroll their children in SES tutoring.

The district does have an interest in piloting or expanding other programs that serve the academic needs of students outside of the school day. We believe that this is both feasible within the reallocation rules for SES when funding is not fully utilized through contracted services and on a larger scale with the participation of community partners.

**CONCLUSION**

Thank you again for your informative and constructive report on SES services in PPS. The conclusions and recommendations in this audit will help guide us toward our goal of creating and providing high quality, effective tutoring services for each PPS student who needs and wants them.

Sincerely,



Carole Smith

# APPENDICES



# APPENDIX A

**Oregon Approved Supplemental Educational Service (SES) Providers  
Providing Services in Portland Public Schools – 2008-09**

The following chart is a list of the approved Supplemental Educational Services/tutoring providers and a brief description of the services they offer. You may select one (1) provider for your child.

Provider Contact Information	Location of Services	Content/Target Population	Staff to Student Ratio	Schedule	Cost per hour	Approximate Number of Sessions/ Weeks	Program Effectiveness	Staff Qualifications
<b>A+ Advantage Point Learning</b> Heather Young 503-570-8864 <a href="mailto:heathery@advantagepoint.org">heathery@advantagepoint.org</a>	Lane MS George MS Biz Tech @ Marshall Campus ACT, POWER and SEIS @ Roosevelt Campus	Math and Reading Grades K-12	1-to-1 and small group (1:5)	2 sessions per week  60 minutes per session	\$59 per hour	27 sessions/ 14 weeks	In the 2006-07 school year: 86% of students met their academic goal (students who completed the program) 828 students were served in Oregon (students who came for at least 1 session) 187 students met their goal (of those students who completed the program)	Certified teachers; Degreed professionals with extensive teaching experience
Advantage Point Learning is Oregon's oldest and largest SES provider, serving more Oregon students than any other provider in the past 6 years. We guarantee success: over 90% of students completing the Advantage Point Learning program meet or exceed their academic goals. Students earn Advantage Award Incentives including iPods, cell phones, savings bonds, gift cards, sporting equipment, electronics, and other prizes.								
<b>Club Z</b> Neil Buchan 503-439-6333 <a href="mailto:nbuchan@clubztutoring.com">nbuchan@clubztutoring.com</a>	IN-HOME or Lane MS George MS Biz Tech @ Marshall Campus ACT, POWER and SEIS @ Roosevelt Campus	Math and Reading Grades K-12	1:1	2 sessions per week	\$44.25 per hour	36 sessions/ 18 weeks	In 2006-2007, Club Z served 213 students, 82% or 174 students met their academic goals.	Club Z recruits only highly qualified, skilled instructional staff who are certified teachers and degreed professionals.
CLUB Z OFFERS ONE-ON-ONE TUTORING. Club Z will give a FREE IPOD NANO, which holds 2000 songs, 3500 pictures and 8 hrs of video to all students who complete our program. One on one tutoring accelerates learning process and allows customized instruction. The students work with the SAME TUTOR in most cases all year. Tutoring performed in your home (anytime) or at student's school (after or before), flexible scheduling.								
<b>Daekyo America, Inc.</b> Young Hwa Kim 503-997-5488 <a href="mailto:enopiportland@yahoo.com">enopiportland@yahoo.com</a>	Student's home	Math Grades K - 8	1-to-1 and small group (1:3)	1 – 2 sessions per week  60 minutes per session	\$45 per hour	30 sessions/15 weeks	In 2006-2007, 87% of students who received services from Daekyo America, Inc met their academic goal in math. 221 students were served and 192 met their academic goal.	Qualified tutors who pass our own exams. At least in college or with a B.A.
Daekyo America Inc has been providing SES since year 2005 in the state of CA and has been approved to serve in the state of TX and OR this year. E.nopi Math is a highly individualized program that focuses on meeting the student's eye level. By providing colorful workbooks with fun supplemental materials, E.nopi Math motivates students to study on their own and excel in the subject area.								

**Oregon Approved Supplemental Educational Service (SES) Providers  
Providing Services in Portland Public Schools – 2008-09**

Provider Contact Information	Location of Services	Content/Target Population	Staff to Student Ratio	Schedule	Cost per hour	Approximate Number of Sessions/ Weeks	Program Effectiveness	Staff Qualifications
<b>IRCO</b> Robin Hibbs 503-253-4042 <a href="mailto:robinh@mail.ircoco.org">robinh@mail.ircoco.org</a>	Lane MS George MS Biz Tech @ Marshall Campus ACT, POWER and SEIS @ Roosevelt Campus	ELD and Math tutoring for students Grades 6-12..	Small group (1:8)	60-minute tutoring sessions, twice per week.	\$40/hour	40 sessions/ 20 weeks	In 2006-07, 72% of students in IRCO programs met their math academic goal. 461 students were served and 332 students met their goals in 2006-07.	Each tutor holds a current teaching certificate and has at least one year of experience tutoring in ELD and/or mathematics.
IRCO's SES program will teach math and English Language Development using Great Source Education Group and Pearson curricula so that students will be well prepared to take the Oregon standardized tests. Bus passes will be available to all students and a variety of incentives will be offered to encourage achievement and participation. IRCO's achievement-focused SES program is particularly well-suited to the needs of limited English-speaking immigrant and refugee youth.								
<b>Open Meadow – Step Up</b> Hanif Fazal 503-488-5162 <a href="mailto:hanif@openmeadow.org">hanif@openmeadow.org</a>	BizTech HS ACT, POWER and SEIS @ Roosevelt Campus	Reading and Math Grades 9 and 10	1-to-1 Small group (1:5)	Three hours/week 90 min. sessions	\$50.00/hour	21 sessions	No data available.	At least 2 years experience working in an educational or learning environment, bachelor's degree preferred.
STEP UP provides intensive academic support and advocacy for 9 <sup>th</sup> and 10 <sup>th</sup> grade students. Through STEP UP, students receive tutoring, advocacy, and social and school skills development. With this level of commitment students are able to receive the intensive academic and personal support they need in order to have a successful freshman or sophomore year.								
<b>Sylvan, Ace-It</b> Heidi Buchanan 503-423-7886 <a href="mailto:heidib_sylvan@yahoo.com">heidib_sylvan@yahoo.com</a>	Lane MS George MS Biz Tech @ Marshall Campus ACT, POWER and SEIS @ Roosevelt Campus	Reading and Math Grades K-12	Small group (1:8)	2 sessions per week 60 minutes per session	\$46 per hour	34 sessions/ 17 weeks	In 2005-2006, 92% of students in the Sylvan, Ace it tutoring program met or exceeded their academic goal. Served 21 students.  In 2006-2007, Served 40 students. Achievement data not available.	Certified Teachers and degreed professionals that have experience tutoring in a multi-cultural environment.
Our program is a successful worldwide supplemental education program. We focus on helping children master academic skills, get better grades, and achieve higher standardized test scores. While in our program students will also gain the confidence and motivational skills that will help them succeed in life. Students can earn gift card incentives, up to \$50.00, based on attendance, achievement and program completion.								





# APPENDIX B

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# APPENDIX C

## Lane and George Middle School students: Average achievement gains 2007-08 to 2008-09

### Gains in MATH: SES participants (20+ hours subject-specific SES) vs. non-participants \*

MATH benchmark status ('08-09)	SES (20+ hrs)	Non- participants
Did not meet	9.3	6.8
Met	5.9	4.7
Exceeded	2.9	2.1
<b>TOTAL</b>	<b>6.7 **</b>	<b>4.8 **</b>

\* Includes non-participants and those completing less than 20 hours of SES.

\*\* Differences between SES and non-participant groups are statistically significant at the .05 level.

### Gains in READING: SES participants (20+ hours subject-specific SES) vs. non-participants\*

READING benchmark status ('08-09)	SES (20+ hrs)	Non- participants
Did not meet	8.9	8.1
Met	2.5	3.9
Exceeded	0.0	1.0
<b>TOTAL</b>	<b>5.2</b>	<b>5.0</b>

\* Includes non-participants and those completing less than 20 hours of SES.

NOTE: Differences between groups are NOT statistically significant.

### Percentage of students not meeting benchmark in '07-08 who met or exceeded in '08-09

Benchmark subject	SES (20+ hrs)	Non- participants
Math	60%**	24.1%**
Reading	26.3%	16.2%

\* Includes non-participants and those completing less than 20 hours of SES.

\*\* Differences between SES and non-participant groups are statistically significant at the .05 level.

