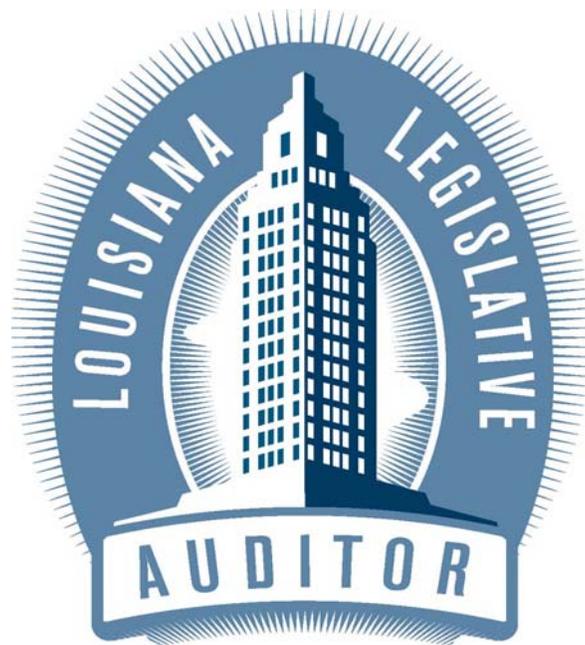


DEPARTMENT OF EDUCATION  
DIVISION OF STUDENT LEARNING AND SUPPORT



PERFORMANCE AUDIT  
ISSUED APRIL 29, 2009

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LOUISIANA LEGISLATIVE AUDITOR  
STEVE J. THERIOT, CPA

April 29, 2009

The Honorable Joel T. Chaisson, II,  
President of the Senate  
The Honorable Jim Tucker,  
Speaker of the House of Representatives

Dear Senator Chaisson and Representative Tucker:

This report provides the results of our performance audit of the Department of Education, Division of Student Learning and Support. The audit was conducted under the provisions of Title 24 of the Louisiana Revised Statutes of 1950, as amended.

The report contains our findings, conclusions, and recommendations. Appendix A contains the response of the Louisiana Department of Education. I hope this report will benefit you in your legislative decision-making process.

We would like to express our appreciation to the management and staff of the Division of Student Learning and Support for their assistance during this audit.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve J. Theriot", is written over a faint, circular watermark or seal.

Steve J. Theriot, CPA  
Legislative Auditor

SJT/dl

DOESLS09

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# Office of Legislative Auditor

Steve J. Theriot, CPA, Legislative Auditor



Department of Education  
Division of Student Learning and Support

April 2009

Audit Control # 40070029

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## Executive Summary

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We conducted a performance audit of the Department of Education (DOE) after-school programs, located within the Division of Student Learning and Support (DSL). The objective of this audit and overall results are summarized below.

**Objective:** Has DOE implemented the management controls necessary to effectively manage its after-school programs?

**Results:** Although DOE made some improvements during our audit, the department still needs stronger management controls to ensure that it effectively manages its after-school programs. Our audit findings describe areas where DOE could improve. The findings are as follows:

- DOE has not implemented sufficient management controls to ensure that only qualified program providers are selected to receive grants.
- DOE has not monitored program providers as required by state and federal regulations.
- Providers we surveyed were generally satisfied with the training they received from DOE, but DOE should improve the timeliness of its training.
- DOE has not approved contracts in a timely manner.
- DOE lacks sufficient information to measure the effectiveness of its after-school programs because of questionable methodology.

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## Introduction

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### Audit Initiation, Objective, and Scope and Methodology

We conducted this audit under the provisions of Title 24 of the Louisiana Revised Statutes of 1950, as amended. The objective of this audit was to answer the following question:

***Has DOE implemented the management controls necessary to effectively administer its after-school programs?***

In conducting the audit, we followed the generally accepted government auditing standards promulgated by the United States Government Accountability Office. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. The period covered by the audit was fiscal years 2005 through 2008; however, some portions of the audit extended only through fiscal year 2007. To answer the audit objective, we performed the following audit procedures:

- Researched state laws, federal laws, and executive budget documents to determine DOE's legal authority, responsibilities, missions, and goals and to identify pertinent laws governing the after-school programs
- Interviewed DOE officials, staff, and former employees to obtain general information on the programs
- Examined performance evaluations prepared by DOE on grant reviewers and interviewed grant reviewers to obtain information on grant review process and feedback on how after school programs can be improved
- Selected and examined for consistency a sample of program applications reviewed by grant reviewers
- Attended site visits of after-school program providers to observe DOE's monitoring process
- Examined and analyzed documentation of DSLS's monitoring activities for contracts in effect from fiscal year 2005 through fiscal year 2007
- Examined DSLS's draft contract manual
- Attended DOE's training for program providers to observe the training process
- Surveyed program providers to obtain input on the after-school programs and recommendations to improve the programs
- Interviewed staff from DOE's Division of Appropriations Control to obtain information on the contract process and data relating to contracts with grant reviewers
- Conducted a best practices review of other states' after-school programs to determine how they measure program effectiveness

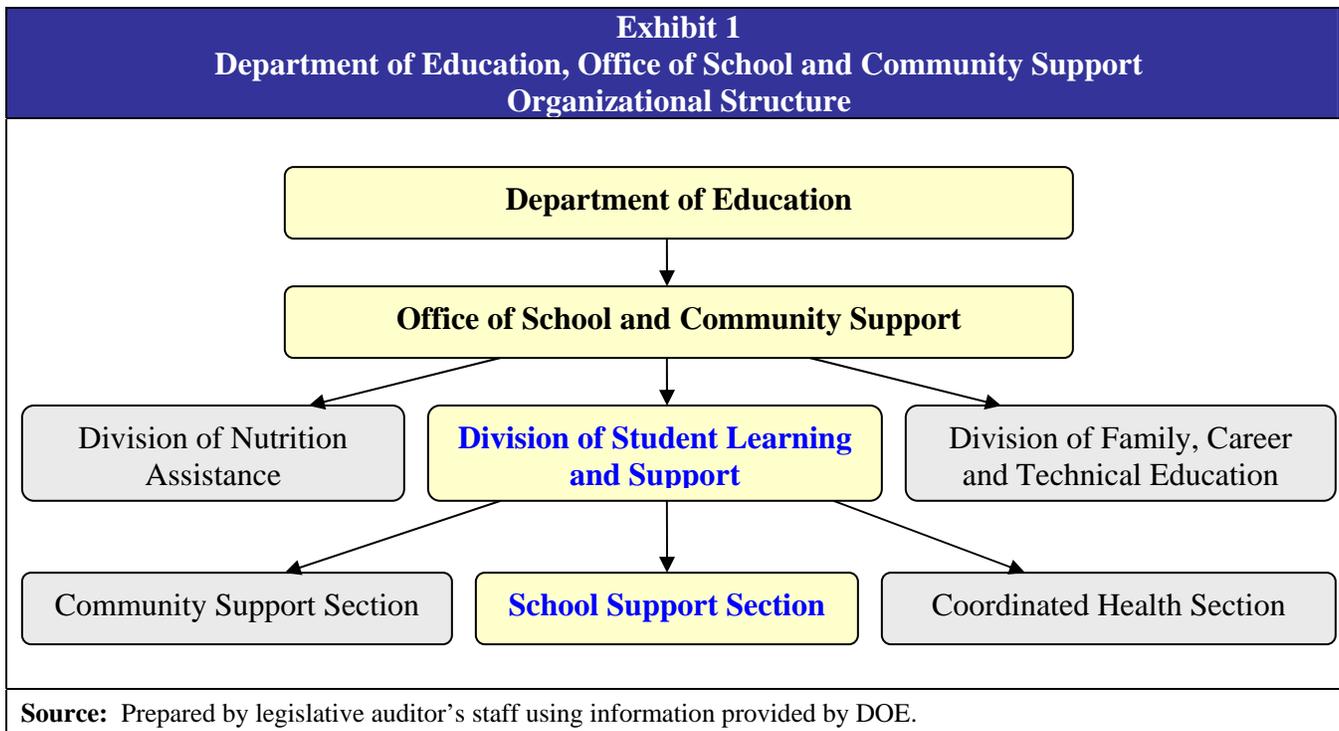
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## **Overview of the Division of Student Learning and Support**

**Legal Authority.** Louisiana Revised Statute (R.S.) 36:642 establishes the Office of School and Community Support (OSCS) within the DOE. OSCS performs the functions of the

state relating to student, school, and community health and nutrition programs; transportation; community adult training programs; and postsecondary and workforce development programs.

**Mission and Organizational Structure.** The mission of OSCS is to provide leadership and educational support services to communities and schools. OSCS accomplishes its mission through three different divisions: the Division of Nutrition Assistance; the Division of Family, Career and Technical Education; and the Division of Student Learning and Support (DSL). The audit focused on the School Support Section of DSL, which administers all after-school programs. Exhibit 1 shows the organizational structure of DOE and OSCS.



**Description of After-school Programs.** DOE administers three contractual after-school programs<sup>1</sup>: TANF After-school for All (TANF), 21<sup>st</sup> Century Community Learning Centers (21<sup>st</sup> CCLC), and Community Based Tutorial Program (CBTP).

1. The **TANF** program provides prevention activities targeted to populations at risk of welfare dependency. After school programs known to prevent teen pregnancy and high school non-completion are funded with performance-based contracts awarded to local education agencies. Contractors are required to provide recreation, academics, and enrichment to K-12 students in low-income communities.
2. The **CBTP** provides an alternative educational approach during after-school hours for students who are at risk of dropping out of school. The strategy is to provide

<sup>1</sup> DOE also administers the Supplemental Education Services (SES) program. We did not include this program in the scope of this audit because DOE does not directly oversee the contract process for that program.

additional instructional time with a reduced teacher/student ratio to allow for individualized instruction in math, writing, and reading.

3. The **21<sup>st</sup> CCLC** funding provides for comprehensive youth development programs that incorporate research-based components, including an academic component. Activities may include the arts, parent literacy, academic intervention, character education, recreation, service learning, and technology. Schools and community-based organizations are eligible for funding. Projects are expected to sustain programming at the end of the three-year grant cycle.

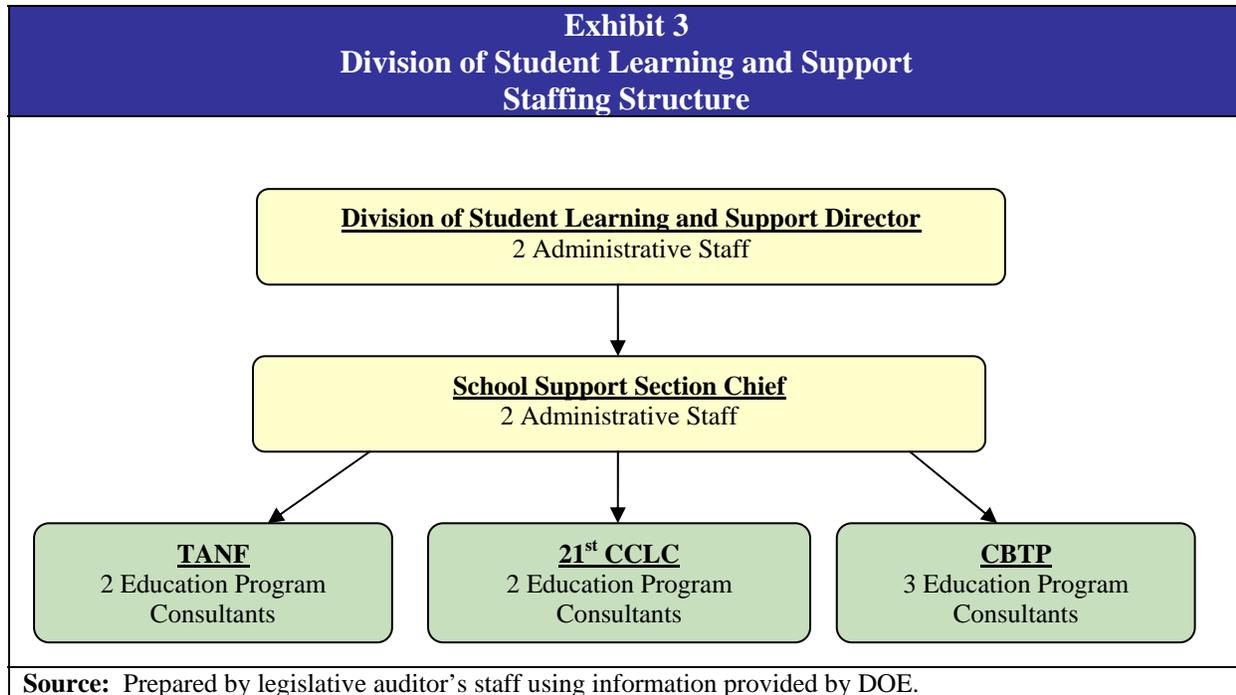
During our audit, DOE proposed a number of changes to the after-school programs for the 2008-2009 academic year. DOE made the most significant changes to the TANF program. Previously, community-based organizations were the major providers of TANF programs. In 2008-2009, DOE restricted funding to low-performing local education agencies (LEAs) and gave them the option of partnering with local community organizations. LEAs that qualified received an allocation from DOE and took on monitoring responsibilities of the community organizations if they chose to partner with them. DOE also required that the programs' academic components align with DOE's literacy and numeracy initiatives. In addition, DOE changed the method of reimbursement for TANF providers.

DOE also made changes to the CBTP and 21<sup>st</sup> CCLC programs to align their academic components with DOE's literacy and numeracy initiatives. DOE added requirements for CBTP providers in an attempt to standardize requirements for all after-school program providers. CBTP's new requirements include online database reporting and partnership with local schools.

**Legal Authority for Programs.** DOE administers the TANF program through a Memorandum of Understanding (MOU) with the Department of Social Services (DSS). The 21<sup>st</sup> CCLC program is a federally funded program and is authorized by the Elementary and Secondary Education Act. CBTP is completely state funded and is included in DOE's executive budget. Exhibit 2 summarizes the legal authority for these three after-school programs.

| <b>Exhibit 2</b>  |   |  |
|---|---|--|
| <b>Department of Education</b>  |   |  |
| <b>Legal Authority for After-school Programs</b>  |   |  |
|   | <b>Legal Authority</b>  | <b>Description</b>   |
| <b>TANF</b>   | 67 Louisiana Administrative Code (LAC), Part III  | Authorizes MOU between DSS and DOE, which allows DSS to transfer TANF funds to DOE for administration of TANF programs |
|   | MOU between DSS and DOE   | Defines conditions under which DOE will administer TANF funds provided by DSS  |
|   | Social Security Act, Title IV, Part A-42 USCA 7, Sections 601-619                                   | Provides general rules and regulations for all programs funded by federal TANF block grants to states                  |
|   | TANF Regulations - 45 CFR 260-265   | Provides general administrative regulations for all programs using federal TANF funds                                  |
| <b>CBTP</b>   | No authorizing legislation found  | Included in DOE Executive Budget as part of sub-grantee assistance funds   |
| <b>21<sup>st</sup> CCLC</b>   | Elementary and Secondary Education Act of 1965 (ESEA), Title IV, Part B - 20 USCA §§ 7171 - 7176    | Authorizes 21 <sup>st</sup> CCLC programs and provides guidelines for state implementation                             |
|   | Education Department General Administrative Regulations (EDGAR) 34 CFR §§76, 77, 80, 82, 85, and 99 | Provides general administrative regulations for all programs administered by states with federal education funds       |
| <b>Source:</b> Prepared by legislative auditor's staff using information obtained from Westlaw. |   |  |

**Personnel.** DOE staff oversees the programs by managing the application process, providing training and technical assistance, and monitoring providers. From September 1, 2003, to September 16, 2008, DSLS experienced a high rate of both management and staff turnover. Nineteen employees left the division during that time. In addition, DSLS currently has its fifth division director in five years. DOE hired this new director in September 2008 and made other staffing changes in key positions. We received positive feedback from program providers, DOE staff, and other stakeholders during the audit on the direction DSLS has taken since DOE management made these staffing changes. As of August 11, 2008, DOE had designated 11 staff members to work with the TANF, 21<sup>st</sup> CCLC, and CBTP programs, as shown in Exhibit 3.



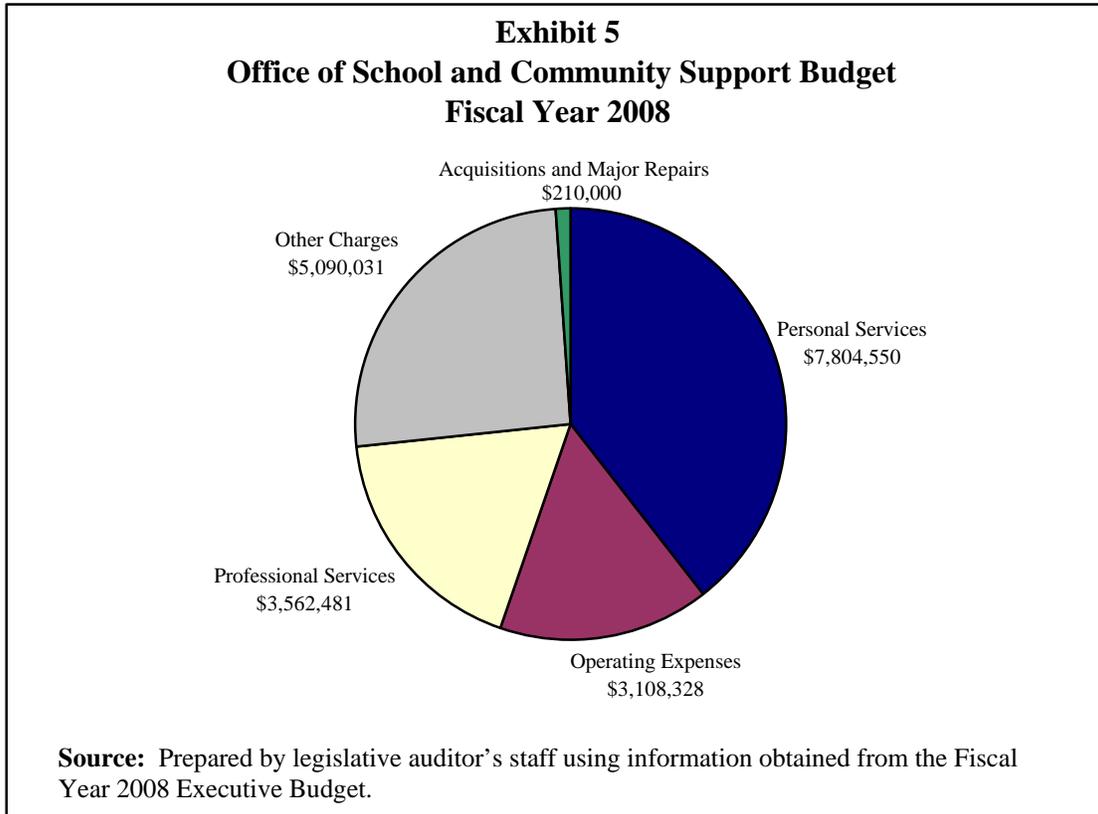
**Payments to Grant Reviewers.** DOE uses grant reviewers to review and score grant applications for the after-school programs. DOE paid the reviewers approximately \$69,000 to read grant applications from August 2007 to July 2008. Exhibit 4 shows payments to the grant reviewers for this period.

**Exhibit 4**  
**Grant Reader Payment Information**  
**August 29, 2007 Through July 30, 2008**

| <b>Contract Approval Date</b> | <b>Contract Closed Date</b> | <b>Maximum Contract Amount</b> | <b>Amount Paid</b> |
|-------------------------------|-----------------------------|--------------------------------|--------------------|
| 8/29/2007                     | 7/9/2008                    | \$9,000                        | \$7,200            |
| 8/29/2007                     | 7/23/2008                   | 9,000                          | 2,760              |
| 8/29/2007                     | 11/28/2007                  | 9,000                          | 1,600              |
| 8/30/2007                     | 7/30/2008                   | 9,000                          | 3,496              |
| 9/5/2007                      | 6/5/2008                    | 9,000                          | 7,544              |
| 8/29/2007                     | 7/10/2008                   | 9,000                          | 0                  |
| 8/29/2007                     | 7/9/2008                    | 9,000                          | 4,300              |
| 9/12/2007                     | 6/28/2008                   | 9,000                          | 7,360              |
| 9/12/2007                     | 7/23/2008                   | 9,000                          | 7,728              |
| 9/10/2007                     | 7/9/2008                    | 9,000                          | 0                  |
| 9/10/2007                     | 7/30/2008                   | 9,000                          | 8,400              |
| 9/10/2007                     | 6/28/2008                   | 9,000                          | 7,176              |
| 10/26/2007                    | 6/2/2008                    | 9,000                          | 6,808              |
| 11/15/2007                    | 7/23/2008                   | 9,000                          | 5,520              |
| <b>Total</b>                  |                             | <b>\$126,000</b>               | <b>\$69,892</b>    |

**Source:** Prepared by legislative auditor's staff using information provided by DOE.

**Budget.** The OSCS budget for fiscal year 2008 is almost \$20 million. Exhibit 5 shows this budget. In addition, OSCS administered approximately \$711 million in sub-grantee assistance funds. This amount is not included in the OSCS operating budget. The DSLS budget is about \$7 million.



## Has DOE Implemented the Management Controls Necessary to Effectively Administer Its After-school Programs?

While DOE has made progress since the audit began, the department still needs to improve some of its management controls to help ensure that it administers its after-school programs as effectively as possible. DOE can make improvements in its review of grant proposals, monitoring of providers, training provided to program providers, timeliness of contract approvals, and measuring of program effectiveness. We discussed our recommendations with management during the audit, and it has already begun implementing some of them. In addition, several staff members and providers we interviewed mentioned an improvement in the general administration of the after-school programs in recent months. The following sections describe in detail the areas where DOE should improve and include recommendations to assist DOE in improving its management controls.

**DOE Has Not Implemented Sufficient Management Controls to Ensure That Only Qualified Program Providers Are Selected to Receive Grants.**

**DOE has no formal criteria to choose grant reviewers.** DOE uses grant reviewers to score grant applications and determine which applicants will receive funding for the TANF and 21<sup>st</sup> CCLC programs.<sup>2</sup> According to current DOE officials, the previous division director was solely responsible for selecting grant reviewers. She did not use any formal criteria to select the reviewers. Current DOE staff told us that the previous director was in the process of formalizing the selection process by documenting selection criteria in the division's contract manual. The manual was still in draft form at the time of our audit. We examined the draft and determined that it offers some general guidance for selecting reviewers. For example, it says, "Reviewers should have experience in education and youth programming, preferably grant review and/or proposal writing experience." However, we could not determine if DOE followed these guidelines since the previous director left during the audit and did not document her process for selecting grant reviewers. As a result, management cannot be sure that she selected the most qualified grant reviewers.

It is important that DOE has specific criteria for selecting grant reviewers. It is also important for DOE to document its process for selecting grant reviewers to ensure that it chooses only qualified reviewers and that it obtains the most value for the money spent to pay the reviewers. We discussed the importance of having a formal selection process with current DOE officials. According to them, the new division director is in the process of determining how to proceed with formalizing the selection process.

DOE did not provide grant reviewers with feedback on their performance. DOE completed performance evaluations on the grant reviewers that were selected once the reviewers completed their work. The evaluations contain only general information, such as whether or not the reviewers delivered the reviews on time. They do not provide any details on the individual reviewers' performance. In addition, the evaluations do not directly correlate with whether or not DOE re-selected reviewers to participate in subsequent grant reviews. For example, DOE did not re-select two reviewers who received positive comments on their evaluations. According to these providers, they did not receive any feedback on their performance and were not sure why DOE did not select them to read subsequent grants.

According to DOE's contractual services manual, evaluations must be completed for any contractual services rendered totaling over \$2,000. The manual only provides limited guidance regarding details to include in the evaluations, and it does not require DOE to provide reviewers with this feedback. While the contractual services manual does not state how performance evaluations should be used, DOE could use the information in the evaluations to make decisions on which reviewers perform satisfactorily and which reviewers to select to review grants in the future. In addition, it is important that DOE provide feedback to its reviewers so that they have a clear understanding of DOE's expectations and how they need to improve. We interviewed six

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<sup>2</sup> This process does not apply to CBTP, as CBTP does not follow a competitive process.

grant reviewers to obtain their recommendations to improve the process. Three of the six (50%) recommended that DOE provide them feedback.

**DOE’s grant scoring guidance leaves room for interpretation, which can result in scoring inconsistencies.** DOE provides grant reviewers a scoring tool that provides guidance on how to score applications. The guidance provides a range of points and assigns a meaning to each range. Exhibit 6 shows an example of DOE’s scoring guidance.

| <b>Exhibit 6<br/>Department of Education<br/>Example of Scoring Guidance</b>              |  |
|---|--|
| 0 Points  | Information is not included or information is too unspecific or irrelevant or contrary to instructions to be useful. |
| 1 - 3 Points  | Information is included but lacks some specificity or relevance.   |
| 4 - 6 Points  | Information is included, accurate, and pertinent.  |
| <b>Source:</b> Prepared by legislative auditor’s staff using information provided by DOE. |  |

Although DOE officials said that all scoring guidance leave some room for interpretation, the amount of interpretation could be minimized. The scoring guidance leaves room for interpretation because it does not clearly define what each possible point means. This system can lead to inconsistencies in scoring. Three reviewers score each application individually. According to DOE staff, the reviewers must meet to discuss all grant reviews with more than a 20-point discrepancy amongst the three scores. During these debriefing sessions, DOE expects reviewers to come to a consensus on the scores. If DOE used a scoring tool that leaves less room for interpretation, scoring inconsistencies would be limited and the debriefing sessions may not be necessary. Improving the scoring tool would assist DOE in making the grant review process more efficient and could lessen the need and expense of bringing reviewers together to discuss discrepancies.

**DOE could not provide evidence that it reviewed the grant reviewers’ scores for accuracy.** We selected a sample of 27 scoring reviews completed by grant reviewers for the TANF program and a sample of 96 scoring reviews completed by grant reviewers for the 21<sup>st</sup> CCLC. We determined that the reviewers miscalculated scores, did not record scores, or recorded more than one score in four of the 27 (14.8%) scoring reviews in our TANF sample. The reviewers miscalculated scores, did not record scores, or recorded more than one score in 11 of the 96 (11.5%) scoring reviews in our 21<sup>st</sup> CCLC sample.

According to DOE officials, its staff reviews the following information for each grant:

- Tally of scores from each section of the applications to check the accuracy of the reviewers' calculations
- Identification of applications with a 20-point or higher difference between the high and low scores
- Reviewers' comments for clarity

We asked DOE officials to provide evidence of their review of the reviewers' scores in our samples. DOE could not provide this evidence. Therefore, we could not determine if DOE had actually completed the reviews it is supposed to have completed. It is important that DOE review the grant reviewers' work to ensure that it is accurate and complete.

**DOE could not provide supporting documentation of fourth reviews.** According to DOE policy, if the three grant reviewers who review each application cannot come to a consensus, a fourth grant reader is to review the application. We determined that DOE should have obtained a fourth review for 22.2% of our TANF sample and 6.3% of our 21<sup>st</sup> CCLC sample. DOE provided us with a fourth score for all of the applications in our samples. However, it did not provide us with supporting documentation for the reviews. As a result, we could not determine if the fourth reviewers' work was accurate and complete.

**Grant reviewers' comments were not always legible.** In addition, we could not understand some grant reviewers' comments because they were illegible. For our TANF sample, we identified nine instances where comments were illegible. We identified 12 instances where comments were illegible in our 21<sup>st</sup> CCLC sample.

It is important that reviewers' comments are legible because applicants have the right to appeal if they do not get funded. DOE must be able to justify its scores in cases where applicants appeal. DOE recently moved to electronic submission for some of its grant reviews. This move greatly improved the quality of documentation of reviewers' comments.

**Recommendation 1:** DOE should develop and implement formal policies and procedures that include criteria for selecting grant reviewers and require DOE staff to document the criteria used.

**Summary of Management's Response:** Disagree. The department has written procedures for selection of external grant reviewers, which includes a list of qualifications. However, prior to 2007, the department's Request for Proposal process, including selection of grant reviewers, was conducted by a contractor. After 2007, the department moved the RFP process in-house, using the same grant reviewers that were selected by the contractor. Prior to contracting with grant reviewers, prospective reviewers submitted resumes which were thoroughly reviewed by staff and matched with the list of qualifications.

**Legislative Auditor's Additional Comments:** As stated in the finding, the prior division director was solely responsible for choosing qualified

applicants. According to DOE staff, she did not document her process nor did she follow any criteria for choosing applicants. As part of its new process for grant reviewer selection, DOE should ensure that there are policies and procedures for choosing among reviewers and that the process is documented.

**Recommendation 2:** DOE should prepare detailed performance evaluations of grant reviewers. DOE should use the evaluations to make decisions about re-selecting reviewers for subsequent grant readings.

**Summary of Management's Response:** Disagree. The department currently completes contract evaluations on each contractor. These evaluations will be provided upon request to the contractor. If a grant reviewer performs poorly, his performance is reflected in the evaluation and taken into consideration during future grant reviewer selection processes.

**Legislative Auditor's Additional Comments:** As stated in the finding, the contract evaluations that DOE completes are not detailed. The evaluations only provide general information, such as whether or not the grant reviewer completed the work. They do not provide information on the quality of the work. In addition, DOE could not provide evidence that it used these evaluations to make decisions regarding whether or not to rehire grant reviewers.

**Recommendation 3:** DOE should revise the scoring tool that grant reviewers use when scoring grant applications to more clearly and specifically define the meaning of each score.

**Summary of Management's Response:** Disagree. The rubric and grant review process currently used by the department is modeled after nationally recognized processes. The department expects some degree of variance in reviewers' scores and would be concerned if scores were uniform. It should also be noted that applicants are able to appeal their scores. Appeals are handled by the department's legal division, where the entire process is thoroughly reviewed by legal staff. At present, most if not all appeals have been denied, which confirms the process is not flawed.

**Legislative Auditor's Additional Comments:** We agree that some degree of variance is acceptable and expected. However, as stated in the finding, the level of variance in DOE's current scoring tool can be minimized.

**Recommendation 4:** DOE should ensure that it reviews all grant reviewers' scores for accuracy and documents its reviews.

**Summary of Management's Response:** Partially Agree. The department recently implemented measures that will improve and strengthen the process surrounding rubrics. All rubrics will be recalculated by reviewers before leaving the debriefing meeting; staff will conduct another review of scores for accuracy;

the Section Administrator and the division's Program Officer will review the scores for accuracy again before presenting the documents for final approval to the Division Director and the Assistance Superintendent. All documents related to the selection process will be archived for at least six years.

**Recommendation 5:** DOE should ensure that it conducts fourth reviews when required and fully documents those reviews.

**Summary of Management's Response:** Partially Agree. Fourth reviews are conducted when a variance greater than 20 points exists between scores and efforts to eliminate the variance through discussion and re-scoring have failed. In accordance with division policy and the department's record retention policy, all documents associated with the RFP process are collected and retained for a period of at least six years.

**Legislative Auditor's Additional Comments:** As stated in the finding, DOE has a policy to conduct fourth reviews when necessary. However, DOE could not provide evidence that it actually conducted fourth reviews.

**Recommendation 6:** DOE should require electronic submission of all grant reviews.

**Summary of Management's Response:** Agree. Beginning in 2009, all grant reviewers will submit electronic rubrics with typed comments.

**DOE Has Not Monitored Program Providers as Required by State and Federal Regulations.**

DOE did not monitor all required TANF and CBTP sites as required. DOE monitored only 20 of the 31 (64.5%) sites in our TANF sample. As previously mentioned, DOE administers the TANF program through a MOU with DSS. According to the 2007-2008 memorandum, all TANF programs should receive on-site monitoring annually.

In addition, DOE monitored only 30 of the 32 (93.8%) sites in our CBTP sample. According to DOE's established performance measures, it should monitor all CBTP sites annually. Exhibit 7 shows DOE's monitoring performance for the TANF and CBTP programs.

| <b>Exhibit 7</b>  |             |             |
|---|-------------|-------------|
| <b>TANF and CBTP Monitoring Results</b>   |             |             |
| <b>Fiscal Years 2005 through 2007</b>   |             |             |
|   | <b>TANF</b> | <b>CBTP</b> |
| Number of Sample Sites Monitored  | 20          | 30          |
| Number of Sample Sites Not Monitored  | 11          | 2           |
| Total Number of Sample Sites  | 31          | 32          |
| Percentage of Sample Sites Monitored  | 64.5%       | 93.8%       |
| <b>Source:</b> Prepared by legislative auditor's staff using information provided by DOE. |             |             |

If DOE does not monitor its program sites, it cannot ensure that providers implement the programs correctly. In addition, DOE cannot determine which programs are out of compliance or ensure that it allocates penalties appropriately to out-of-compliance providers. According to DOE officials, low staffing levels and turnover contributed to not conducting all required monitoring. During our discussions with DOE staff about this issue, they informed us that they have monitored all program sites for Fiscal Year 2008.

**DOE did not meet its monitoring requirement for the 21<sup>st</sup> CCLC program.**

According to DOE staff, there are no formal monitoring requirements for the 21<sup>st</sup> CCLC program except that they are to perform some type of monitoring of each provider at some point during the 3-year contract cycle. According to DOE officials, they try to monitor all providers at some level based on risk identified through staff interactions with providers. We determined that six of the 27 (22.2%) contracts in our sample were closed but had not received any type of monitoring. Because DOE does not have formal monitoring requirements for the 21<sup>st</sup> CCLC program, it cannot ensure that all program sites receive the guidance they need to conduct their programs.

While DOE did not meet the monitoring requirement for the six contracts we tested, the department is taking steps to improve its monitoring. For example, we determined that DOE had already monitored 43.8% of the contracts in our sample that were still open. Exhibit 8 shows the monitoring results for the 21<sup>st</sup> CCLC program.

| <b>Exhibit 8</b>  |                         |                       |              |
|---|-------------------------|-----------------------|--------------|
| <b>21<sup>st</sup> CCLC Monitoring Results</b>  |                         |                       |              |
| <b>Fiscal Years 2005 Through 2007</b>   |                         |                       |              |
|   | <b>Closed Contracts</b> | <b>Open Contracts</b> | <b>Total</b> |
| Number of Sample Sites Monitored  | 5*                      | 7                     | 12           |
| Number of Sample Sites Not Monitored  | 6                       | 9                     | 15           |
| Total Number of Sample Sites  | 11                      | 16                    | 27           |
| Percentage of Sample Sites Monitored  | 45.5%                   | 43.8%                 | 44.4%        |
| *DOE monitored two of these contracts after the contracts had ended.                      |                         |                       |              |
| <b>Source:</b> Prepared by legislative auditor's staff using information provided by DOE. |                         |                       |              |

**Recommendation 7:** DOE should follow its monitoring guidelines for the CBTP and TANF programs.

**Summary of Management's Response:** Partially Agree. The department acknowledges that during the period prior to 2007, onsite monitoring of programs was limited due to a severe personnel shortage. However, the department's inability to meet monitoring obligations was communicated to both federal and state-level granting agencies. Since that time, the department has retained a sufficient number of staff persons to fulfill all monitoring responsibilities. Furthermore, it is the department's position that monitoring can be conducted without an actual onsite visit.

**Legislative Auditor's Additional Comments:** We counted any type of monitoring DOE conducted, including monitoring that was not an actual on-site visit. However, as stated in the finding, DOE still did not meet the monitoring requirements for its after-school programs.

**Recommendation 8:** DOE should develop and implement formal policies and procedures that specify its monitoring goals for 21<sup>st</sup> CCLC, similar to the goals for the CBTP and TANF programs.

**Summary of Management's Response:** Disagree. The department has established monitoring policies for all of its after-school programs, including 21<sup>st</sup> CCLC. However, in addition to monitoring, the department is also responsible for offering training and disseminating information to providers regarding program operations, fiscal compliance, and general grant management. Because many of our providers have no prior experience in operating an after-school program, the department places emphasis on the provision of technical assistance. It is the department's policy, after providing technical assistance, to allow the provider an opportunity to make improvements and adjustments prior to conducting a monitoring review.

**Legislative Auditor's Additional Comments:** As stated in the finding, DOE does not have policies and procedures for how often it will monitor 21<sup>st</sup> CCLC programs, as it has for the TANF program and CBTP. It is important that DOE develop guidelines for how often it will monitor 21<sup>st</sup> CCLC programs to ensure that these programs are being implemented correctly.

**Providers Were Generally Satisfied With Training They Received From DOE, but DOE Should Improve Timeliness of Training.**

We surveyed providers who attended DOE’s training sessions to obtain their feedback on the information DOE provided them.<sup>3</sup> Generally, the providers said that they were satisfied with the information they received from the training sessions. Some of the respondents said that the trainings DOE had recently provided were the best they had ever received. However, some providers stated that DOE held some of the training necessary to begin implementing their programs after the programs had already started. We asked providers for suggestions on how DOE could improve its training. One of the suggestions was that DOE provide training in a more timely manner. Other suggestions included the following:

- DOE should allow more time for program providers to talk to each other regarding problems faced at different program sites.
- DOE should provide more information on how providers should implement new program changes.
- DOE should provide periodic training updates throughout the program year.
- DOE should continue to improve communication between itself and providers.

Other evidence supports this recommendation as well. In a letter dated June 6, 2008, the United States Department of Education (USDOE) cited communication between program providers and program staff as a potential problem. According to the letter, “Based on discussions with providers and DOE coordinators, it appears there may be miscommunications between LA DOE and providers on issues related to budget, personnel, funding, and program authorization. Specifically, several providers expressed their belief that decisions made by the LA DOE coordinators are often made arbitrarily, without the benefit of information and data from the field.” US DOE recommended that DOE consider convening a working group to discuss issues related to after-school programs in the state. As part of its response to this recommendation, DOE established the Louisiana After-school Task Force. The Task Force met on October 23, 2008, to develop after-school program standards and to recommend a methodology to measure program effectiveness.

- DOE should make trainings Web-based when possible.

In our research, we learned that Pennsylvania’s and Virginia’s departments of education provide Web-based training for their after-school program providers. Web-based training could reduce the amount of time that providers have to travel for training. It would also allow providers to access training information at a time

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<sup>3</sup> We sent 272 surveys and received 60 responses.

that is convenient for them. Providing web-based training could also reduce DOE's cost of providing services because it would not have to hold training sessions in several locations throughout the state.

As mentioned earlier, some providers said that DOE held some training sessions after the programs had already started. For example, DOE held training sessions related to data collection tools after the program start date. As a result, the providers did not have adequate database training before the start of the program. In addition, DOE made various changes to the after-school programs, which the Board of Elementary and Secondary Education (BESE) did not approve until August. This factor also delayed the training sessions. As a result, providers were not fully aware of all program changes until the training sessions, which occurred after the program start date. Therefore, DOE could not ensure that the providers implemented the programs according to guidelines since the providers did not have all necessary program information before the program start date.

**Recommendation 9:** DOE should provide Web-based training to its providers when possible.

**Summary of Management's Response:** Agree. The department has implemented Web-based trainings for after-school providers as well as Web-based refreshers on usage of STARS and other database systems. Additionally, the department convenes quarterly conference calls with providers from each program to offer support in the implementation process.

**Recommendation 10:** DOE should ensure that all orientation and training sessions are timely and that it communicates changes about the after-school programs to providers before they start their programs.

**Summary of Management's Response:** Agree. The department recognizes the need for grantee program staff to participate in high-quality professional development activities and has strived to ensure all professional development is given in a timely manner. The department hosts regularly scheduled training events for each of its after-school programs on an annual basis. However, the hurricanes of 2008 and significant changes made to all after-school programs delayed the schedules for training and programs implementation.

**DOE Has Not Approved Contracts in a Timely Manner.**

In a letter dated June 6, 2008, the USDOE cited DOE for problems with contract reimbursements. According to the letter, "During a site visit, USDOE staff observed a clear disconnect between the DOE's program staff and the finance division. In the case of FY 2005 funds, the program staff was unaware of over half a million dollars that are available for drawdown for grants already completed or in liquidation."

During our audit, we determined that DOE may not have sufficiently addressed USDOE's concerns. While DOE's program staff is responsible for monitoring the providers, DOE's finance division, the Division of Appropriations Control (DAC), is responsible for administering program funds. According to DOE staff, once a provider has an approved contract, the provider can begin spending funds from the approved budget and be reimbursed by DAC on a regular basis. According to DAC staff, timely approval of contracts has been an issue, as well as coordinating the spending of program funds. According to these staff members, providers may be encouraged to begin spending program funds without having approved contracts in place. In addition, some providers did not have an approved contract in place before they started their programs. DOE expected them to begin their programs and required them to attend orientation and training sessions without an approved contract in place.

It is important that program staff and financial division staff communicate and coordinate with each other. If they do not, they cannot ensure that providers will obtain approved contracts and get reimbursed timely. In addition, more effective communication would help ensure all program funds are expended appropriately.

**Recommendation 11:** DOE, in coordination with BESE and the Office of Contractual Review, should ensure that all contracts are approved prior to providers beginning their programs.

**Summary of Management's Response:** Agree. School Support staff meet and communicate regularly with purchasing and contracts staff to ensure the contract approval process moves smoothly for in-house approval by BESE and with the Office of Contractual Review.

**Recommendation 12:** DOE should improve communication between program staff and the finance division.

**Summary of Management's Response:** Agree. While there is always room for improvement, since June 2008, members from both the School Support Section and Finance Division meet monthly to review grantee expenditure levels. With information gathered from these meetings, program staff is able to develop strategies to ensure limited funding is expended in a manner that provides the greatest benefit to the greatest number of children.

**DOE Lacks Sufficient Information to Measure the Effectiveness of Its After-school Programs Because of Questionable Methodology.**

**A Louisiana organization that specializes in after-school programs has questioned the methodology DOE's contractor used to measure program effectiveness.** The MOU between DSS and DOE requires DOE to monitor TANF program operations and contract with a third party to review academic outcomes and behavioral changes. It also requires DOE to ensure

providers implement services to meet established performance criteria and provide necessary intervention to improve performance. In addition, the 21<sup>st</sup> CCLC guidelines require that DOE use the results of program evaluations to improve the programs and make them stronger.

DOE has a 3-year contract beginning July 1, 2007, with the University of Louisiana at Lafayette's Cecil J. Picard Center for Child Development (CCD) to evaluate effectiveness of the after-school programs. The maximum amount of the contract is \$1,354,355. As of February 12, 2009, DOE had paid CCD approximately \$460,617. Although DOE contracts with CCD, it does not review the accuracy or appropriateness of the information included in the report it receives from CCD. According to the Louisiana after-school education organization, CCD's results were insignificant due to the small sample size, lack of pre- and post-testing, and using only one year of data to measure academic achievement. In addition, the test scores CCD used to measure program effectiveness did not include the entire population of participants; therefore, the evaluation conducted by CCD may not be reliable.

CCD also uses *i*LEAP and LEAP scores to measure academic improvement. However, students in pre-K through 2nd grade and 10th through 12th grade participate in the after-school programs but are not included in the effectiveness evaluations because they do not take the LEAP or *i*LEAP tests.

Since DOE uses the information in CCD's report to make management decisions regarding the after-school programs, it needs to ensure the accuracy and appropriateness of CCD's analysis. Otherwise, it may make inappropriate decisions for the programs. In addition, DOE should ensure that CCD includes the entire population of after-school participants in its analysis.

Federal and state guidelines do not detail how DOE should measure the effectiveness of its after-school programs. Although federal and state guidelines require DOE to measure program effectiveness, they contain no specific guidance on how to measure effectiveness or how to use the results of reports on effectiveness. During our research on other states, we determined that DOE is similar to the California, Massachusetts, Michigan, Pennsylvania, and Virginia departments of education in that it expects to see increased academic achievement as a result of its after-school programs. The California, Massachusetts, and Michigan departments gather information used for evaluating program effectiveness while monitoring their after-school programs. This methodology reduces the amount of reporting work required from the providers. California's department uses the same effectiveness measurement tools on both its 21<sup>st</sup> CCLC and state-funded after-school programs because it is an integrated and cost-efficient approach to after-school program evaluation. DOE could benefit from implementing similar strategies.

Also, currently, DOE uses a separate monitoring tool for each after-school program. DOE staff conducted a best practices review of other states' after-school programs, but the review was not thorough. DOE would benefit from reviewing other states' monitoring tools to determine if a better tool is available that provides information in a more effective and user-friendly manner.

As mentioned previously, DOE convened the Louisiana After-school Task Force on October 23, 2008, to develop standards for the after-school programs. The task force recommended a method for DOE to use when evaluating programmatic effectiveness. The method consists of the following three factors:

1. Academic achievement using a state-identified assessment
2. Customer satisfaction using surveys to determine the program effectiveness based on results from parents, students, teachers, principals, and district coordinators
3. Compliance monitoring based on DOE staff's on-site monitoring and desk review audits

In December 2008, DOE presented a copy of the standards to BESE for initial review. According to DOE, it will submit the standards to BESE for final approval in March 2009. Upon final approval, the department will provide training to all after-school programs. It will require each program to conduct a program self-assessment to determine the program's level of quality and develop an action plan to meet all requirements by December 2009.

**Recommendation 13:** DOE should ensure that CCD's methodology is appropriate and that it produces results that are accurate and reliable so that management will have useful information to use when making programmatic decisions. If CCD cannot provide the necessary information, DOE should develop alternative means of measuring program effectiveness.

**Summary of Management's Response:** Agree. The department works closely with CCD to ensure the evaluation services will provide valuable and informative results. The method used by CCD is considered a sound methodology and produces results useful for programmatic decisions. For future work, CCD will assess the effectiveness of all programs, not a sample of programs. By assessing the entire population of after-school providers, the department can hold providers accountable for activities, and programs with strong performance can be identified and used as best practices.

**Recommendation 14:** To provide an accurate measure of program effectiveness, DOE should include all program participants, including those in pre-K through 2nd grade and 10th through 12th grade, in its comprehensive annual evaluation.

**Summary of Management's Response:** Partially Agree. The department has made monumental and significant strides in evaluating the effectiveness of its after-school programs. Because LEAP and iLEAP do not address all grade levels, efforts are currently underway to develop a methodology to assess the academic achievement of all grade levels through pre- and post-testing. In December 2008, BESE approved the Louisiana After-school Standards and Measurement of Statewide After-school Programs. The standards will allow for evaluation of the effectiveness of all after-school programs using a three-pronged approach.

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**APPENDIX A: MANAGEMENT'S RESPONSE**





*STATE OF LOUISIANA*  
**DEPARTMENT OF EDUCATION**  
POST OFFICE BOX 94064, BATON ROUGE, LOUISIANA 70804-9064  
Toll Free #: 1-877-453-2721  
<http://www.louisianaschools.net>

March 20, 2009

Steve J. Theriot, CPA  
Louisiana Legislative Auditor  
1600 North Third Street  
Baton Rouge, Louisiana 70804-9397

**RE: Response to the 2004 – 2007 Performance Audit Report  
Division of Student Learning and Support After-school Programs**

Dear Mr. Theriot:

The Louisiana Department of Education, Office of School and Community Support, Division of Student Learning and Support, is in receipt of your audit report dated March 11, 2009. The report summarizes your organization's review of the Division's management controls in regard to after-school programming. The Department welcomes your organization's input and will continue working toward improving program effectiveness and oversight. The recommendations provided in the report will be considered in all future efforts to develop and/or revamp program policies and procedures.

Below are our responses to the findings listed in the report:

**Finding #1: DOE has not implemented sufficient management controls to ensure that only qualified program providers receive grants.**

**DOE's Response:** The Department recognizes the success of its after-school programs begins with the quality of its grant review process. The report does not mention that the Department contracted with the University of Louisiana at Lafayette (ULL) from 2005-2006 to 2006-2007 to implement the Request for Proposal process, which included selection of grant reviewers. By using the same grant reviewers in 2007-2008, the Department essentially used the "work product" of its contractor. It would have been inefficient and uneconomical for staff to re-do a process that had been performed successfully by a contractor. Additionally, prior to contracting with grant reviewers, the Department requires submission of resumes, which are thoroughly reviewed by program staff. All persons serving as grant reviewers for the Department are qualified to perform such services. Grant reviewer backgrounds include but are not limited to teachers and principals; experts in expanded learning and after-school programs; representatives from community education; researchers and evaluators with methodological expertise; content area specialists; representatives from community service agencies and faith-based organizations; private-sector individuals involved in education; representatives from school-age child care alliances; local and civic leaders; representatives from foundations and charitable organizations; and representatives from institutions of higher education.

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Beginning October 2008, the Department implemented new processes for grant reviewer selection that include submission of applications, which are reviewed by the Section Administrator, Division Director, and the Assistant Superintendent of the Office of School and Community Support. Through this process, the Department can ensure only the most qualified are selected to serve as grant reviewers. This process also ensures that grant reviewers represent the racial, ethnic, geographic, and political diversity of our state.

**Finding #2: DOE did not provide grant reviewers with feedback on their performance.**

**DOE's Response:** The grant review process used by the Department is modeled after the grant review process used at the federal level – which does not require feedback be given to grant reviewers. The Department clearly recognizes the importance of performance evaluations in identifying areas of weakness so the one being evaluated can improve and has implemented measures to strengthen this process. The Department now has procedures in place that allow grant reviewers an opportunity to discuss their differing opinions as a means of receiving feedback as to how far off their scores were in the group. Additionally, the Department completes a contractor evaluation form at the end of the contract period that could be shared with reviewers.

**Finding #3: DOE's grant scoring guidance leaves room for interpretation, which can result in inconsistencies.**

**DOE's Response:** The grant review process, including the scoring rubric, used by the Department is based upon a model used at the federal level. Because the process of grant review is subjective, we recognize there may be occasions where the variance between scores is greater than 20 points. As a result, the Department has procedures in place that allow grant reviewers an opportunity to discuss their differing opinions and re-score proposals in an effort to reduce the variance to less than 20 points. If the variance is still greater than 20 points, the proposal is scored by a fourth grant reviewer. This process has worked for the Department with very little inconvenience to grant reviewers. It should be noted, however, that the Department does not view variances as inconsistencies but rather the outcomes of an unbiased and equitable process. In fact, the Department is wary of instances where scores appear uniform amongst grant reviewers.

Additionally, one must take into consideration that an applicant can appeal its score. Appeals are handled by the Department's legal division where the entire process is thoroughly reviewed by legal staff. At present, most, if not all appeals have been denied, which confirms that the process works. The Department will continue to enhance this process based upon national research and will take this recommendation under consideration for future improvements.

**Finding #4: DOE could not provide evidence that it reviewed the grant reviewers' scores for accuracy; DOE could not provide supporting documentation of fourth reviews; Grant reviewers' comments were not always legible.**

**DOE's Response:** As stated earlier, the Department contracted with the University of Louisiana at Lafayette (ULL) to conduct the Request for Proposal (RFP) process prior to 2007. The process included review of rubrics for accuracy as well as a fourth review if necessary. However, due to staffing changes at ULL and with the Division's leadership, the documents could not be retrieved for the auditors' review.

Since that time, the Department has implemented measures to strengthen this process. All rubrics will be recalculated by reviewers before leaving the debriefing meeting; staff will conduct another review of scores for accuracy; the Section Administrator for School Support and the Division of Student Learning and Support Education Program Officer will review the scores for accuracy before presenting the documents for final approval to the Division Director and the Assistant Superintendent. All documents related to the selection process will be archived for at least six years. Beginning 2009, all grant reviewers will submit electronic rubrics with typed comments.

**Finding #5: DOE has not monitored program providers as required by state and federal regulations; DOE did not meet its monitoring requirements for the 21<sup>st</sup> CCLC program.**

**DOE's Response:** The Department acknowledges that during the period prior to 2007, onsite monitoring of programs was limited due to a severe personnel shortage. The Department's inability to meet monitoring obligations was communicated to both federal and state-level granting agencies. Since that time, the Department has retained a sufficient number of staff persons to fulfill all monitoring responsibilities.

It should be noted, however, that "monitoring" can be conducted through a variety of methods, including onsite visits and in-house desk reviews. During the period prior to 2007 and currently, grantees are routinely monitored through desk reviews to ensure student attendance levels are maintained and funds are being expended in accordance with projections. Additionally, grantees are frequently provided technical assistance by program staff, which can be provided through onsite visits, via telephone communication, via email communication, through a grantee visiting the staff person in-house, and through workshops/trainings.

Additionally, monitoring of a provider may also occur after the grant period has closed. Programs are notified that records must be maintained for a period of up to six years for the Department's review. In instances where it is found that improper payments were made to a provider, the Department pursues repayment despite the closure of the grant.

**Finding #6: Providers we surveyed were generally satisfied with the training they received from DOE, but DOE should improve the timeliness of its training.**

**DOE's Response:** The Department recognizes the need for grantee program staff to participate in high-quality professional development activities and has strived to ensure all professional development is given in a timely manner. The Department hosts regularly scheduled training events for each of its after-school programs on an annual basis. However, the Hurricanes of 2008 and significant changes made to all after-school programs delayed the schedules for training and program implementation. The Department has also implemented web-based trainings for after-school program staff, provided refresher web-based database trainings for all providers, and convened quarterly conference calls to provide additional support in the implementation process.

**Finding #7: DOE has not approved contracts in a timely manner.**

**DOE's Response:** The Department agrees that in the past, contract approval was an issue in the division. However, the division has gone to great efforts to ensure that the after-school program staff and education finance staff work together on a regular basis. Since June 2008, members from both divisions meet monthly to review grantee expenditure levels (drawdowns). With information gathered from these meetings, program staff are able to target providers that need specialized technical assistance. Additionally, program staff have been able to develop strategies to ensure limited funding is expended in a manner that provides the greatest benefit to the greatest number of children. Program staff also meet and communicate regularly with purchasing and contracts staff to ensure the contract approval process moves smoothly in-house and with the Office of Contractual Review. It should also be noted that as a result of an April 2008 review, representatives from the U.S. Department of Education commended the Department for implementing measures to ensure 21<sup>st</sup> CCLC providers are meeting fiscal and programmatic projections.

**Finding #8: DOE lacks sufficient information to measure the effectiveness of its after-school programs.**

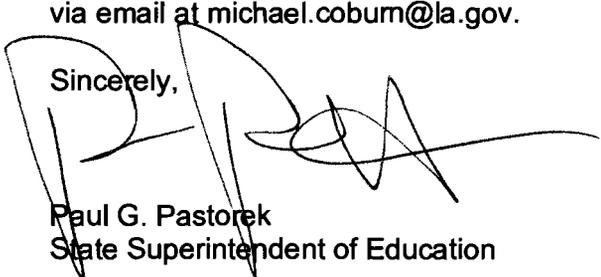
**DOE's Response:** The Department disagrees with this finding. In December 2008, the Board of Elementary and Secondary Education (BESE) approved the Louisiana After-school Standards and Measurement of Statewide After-school Programs. The standards will allow for evaluation of all after-school programs using a three-pronged approach. Programs will be evaluated on (1) academic effectiveness, (2) customer satisfaction, and (3) compliance monitoring results. Each program will receive a performance label of either Fully Approved, Satisfactory, Probation I, or Probation II based upon a composite score from each of the three areas. In addition, the University of Louisiana at Lafayette is evaluating the effectiveness of all programs – not a sample of programs.

**Finding #9: Federal and state guidelines do not detail how DOE should measure the effectiveness of its after-school programs.**

**DOE's Response:** The Department recognizes the need to measure performance and encourage accountability from its providers and has moved forward with developing a sound methodology. As indicated above, the Department recently adopted the Louisiana After-school Standards and Measurement of Statewide After-school Programs. Efforts are currently underway to develop a methodology to assess the academic achievement of all grade levels so that providers can be held accountable for all activities. Staff members are also developing a strategy to roll-out the after-school standards to all providers with a target date for full implementation. In addition to helping the Department identify the most effective programs, the standards will help providers be accountable to their stakeholders, schools, parents, student participants, and communities. The Department continues to work to enhance this process based upon national research and will take this recommendation under consideration for future improvements.

The Department appreciates your willingness to assist in its efforts to "*create a world-class education system for all students*" through after-school programming. If you have any questions, please contact Michael K. Coburn, Director, Division of Student Learning and Support at 225-342-3344, the Department's toll-free number 1-877-453-2721 and/or via email at [michael.coburn@la.gov](mailto:michael.coburn@la.gov).

Sincerely,



Paul G. Pastorek  
State Superintendent of Education

PGP:DNG:MKC:kjr

Enclosure

c: Ollie S. Tyler, Deputy Superintendent of Education  
Patrick Weaver, Deputy Undersecretary  
Beth Scioneaux, Deputy Superintendent of Management and Finance  
Donna Nola-Ganey, Assistant Superintendent  
Michael K. Coburn, Division Director  
Kartina Roberts, Section Administrator



Louisiana Legislative Auditor  
Performance Audit Division

Checklist for Audit Recommendations

**Instructions to Audited Agency:** Please check the appropriate box below for each recommendation. A summary of your response for each recommendation will be included in the body of the report. The entire text of your response will be included as an appendix to the audit report.

| RECOMMENDATION(S)   | AGREE | PARTIALLY<br>AGREE | DISAGREE |
|---|-------|--------------------|----------|
| <b>Recommendation 1:</b> DOE should develop and implement formal policies and procedures that include criteria for selecting grant reviewers and require DOE staff to document the criteria used.<br><b>(p. 14 of the report)</b>             |       |                    | ✓        |
| <b>Recommendation 2:</b> DOE should prepare detailed performance evaluations of grant reviewers. DOE should use the evaluations to make decisions about re-selecting reviewers for subsequent grant readings.<br><b>(p. 14 of the report)</b> |       |                    | ✓        |
| <b>Recommendation 3:</b> DOE should revise the scoring tool that grant reviewers use when scoring grant applications to more clearly and specifically define the meaning of each score.<br><b>(p. 14 of the report)</b>                       |       |                    | ✓        |
| <b>Recommendation 4:</b> DOE should ensure that it reviews all grant reviewers' scores for accuracy and documents its reviews.<br><b>(p. 14 of the report)</b>  |       | ✓                  |          |
| <b>Recommendation 5:</b> DOE should ensure that it conducts fourth reviews when required and fully documents those reviews.<br><b>(p. 14 of the report)</b>   |       | ✓                  |          |
| <b>Recommendation 6:</b> DOE should require electronic submission for all grant reviews.<br><b>(p. 14 of the report)</b>  | ✓     |                    |          |

|   |   |   |   |
|---|---|---|---|
| <p><b>Recommendation 7:</b> DOE should ensure that it follows its monitoring guidelines for the CBTP and TANF programs.<br/>(p. 15 of the report)</p>   |   | ✓ |   |
| <p><b>Recommendation 8:</b> DOE should develop and implement formal policies and procedures that specify its monitoring goals for 21<sup>st</sup> CCLC, similar to the goals for the CBTP and TANF programs.<br/>(p. 16 of the report)</p>  |   |   | ✓ |
| <p><b>Recommendation 9:</b> DOE should provide web-based training to its providers when possible.<br/>(p. 17 of the report)</p>   | ✓ |   |   |
| <p><b>Recommendation 10:</b> DOE should ensure that all orientation and training sessions are timely and that it communicates changes to the after-school programs to providers before they start their programs.<br/>(p. 17 of the report)</p>   | ✓ |   |   |
| <p><b>Recommendation 11:</b> DOE, in coordination with BESE and the Office of Contractual Review, should ensure that all contracts are approved prior to providers beginning their programs.<br/>(p. 18 of the report)</p>  | ✓ |   |   |
| <p><b>Recommendation 12:</b> DOE should improve communication between program staff and the finance division.<br/>(p. 18 of the report)</p>   | ✓ |   |   |
| <p><b>Recommendation 13:</b> DOE should ensure that CCD's methodology is appropriate and that it produces results that are accurate and reliable so that management will have useful information to use when making programmatic decisions. If CCD cannot provide the necessary information, DOE should develop alternative means of measuring program effectiveness.<br/>(p. 20 of the report)</p> | ✓ |   |   |
| <p><b>Recommendation 14:</b> To provide an accurate measure of program effectiveness, DOE should include all program participants, including those in pre-K through 2nd grade and 10th through 12th grade, in its comprehensive annual evaluation.<br/>(p. 20 of the report)</p>  |   | ✓ |   |

## Checklist for Audit Recommendations

|   |                               |
|---|-------------------------------|
| <p><b>Recommendation 1:</b> DOE should develop and implement formal policies and procedures that include criteria for selecting grant reviewers and require DOE staff to document the criteria used.</p>  | <p><b>Disagree</b></p>        |
| <p><b>Response:</b> The Department has written procedures for selection of external grant reviewers – which include a listing of qualifications. However, prior to 2007, the Department’s Request for Proposal process – including selection of grant reviewers – was conducted by a contractor. Post 2007 – the Department moved the RFP process in-house, using the same grant reviewers that were selected by the contractor. Prior to contracting with grant reviewers, prospective reviewers submitted resumes which were thoroughly reviewed by staff and matched with the list of qualifications.</p> <p>In October 2008, the Department implemented a new process for grant reviewer selection that includes submission of applications by prospective reviewers. The applications are reviewed by Division leaders as well as the Superintendent of the Office of School and Community Support. This process ensures the most qualified are selected. It also ensures the grant reviewers selected are representative of the racial, ethnic, geographic, and political diversity of our state.</p> |                               |
| <p><b>Recommendation 2:</b> DOE should prepare detailed performance evaluations of grant reviewers. DOE should use the evaluations to make decisions about re-selecting reviewers for subsequent grant readings.</p>  | <p><b>Disagree</b></p>        |
| <p><b>Response:</b> The Department currently completes contract evaluations on each contractor. These evaluations will be provided upon request to the contractor. If a grant reviewer performs poorly (e.g., incomplete scoring, late submission of rubrics), his performance is reflected in the evaluation and taken into consideration during future grant reviewer selection processes.</p>  |                               |
| <p><b>Recommendation 3:</b> DOE should revise the scoring tool that grant reviewers use when scoring grant applications to more clearly and specifically define the meaning of each score.</p>  | <p><b>Disagree</b></p>        |
| <p><b>Response:</b> The rubric and grant review process currently used by the Department is modeled after nationally recognized processes. The Department expects some degree of variance in reviewers’ scores and would be concerned if scores were uniform. It should also be noted that applicants are able to appeal their scores. Appeals are handled by the Department’s legal division – where the entire process is thoroughly reviewed by legal staff. At present, most if not all appeals have been denied, which confirms the process is not flawed.</p>   |                               |
| <p><b>Recommendation 4:</b> DOE should ensure that it reviews all grant reviewers’ scores for accuracy and documents its reviews.</p>   | <p><b>Partially Agree</b></p> |
| <p><b>Response:</b> The Department has recently implemented measures that will improve and strengthen the process surrounding rubrics. All rubrics will be recalculated by reviewers before leaving the debriefing meeting; staff will conduct another review of scores for accuracy; the Section Administrator and the Division’s Program Officer will review the scores for accuracy again before presenting the documents for final approval to the Division Director and the Assistant Superintendent. All documents related to the selection process will be archived for at least six years.</p>  |                               |

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|--|------------------------|
| <b>Recommendation 5:</b> DOE should ensure that it conducts fourth reviews when required and fully documents those reviews.  | <b>Partially Agree</b> |
| <b>Response:</b> Fourth reviews are conducted when a variance greater than 20 points exists between scores and efforts to eliminate the variance through discussion and re-scoring have failed. In accordance with Division policy and the Department's record retention policy, all documents associated with the RFP process are collected and retained for a period of at least six years.  |                        |
| <b>Recommendation 6:</b> DOE should require electronic submission for all grant reviews.   | <b>Agree</b>           |
| <b>Response:</b> Beginning 2009, all grant reviewers will submit electronic rubrics with typed comments.   |                        |
| <b>Recommendation 7:</b> DOE should ensure that it follows its monitoring guidelines for the CBTP and TANF programs.   | <b>Partially Agree</b> |
| <p><b>Response:</b> The Department acknowledges that during the period prior to 2007, onsite monitoring of programs was limited due to a severe personnel shortage. However, the Department's inability to meet monitoring obligations was communicated to both federal and state-level granting agencies. Since that time, the Department has retained a sufficient number of staff persons to fulfill all monitoring responsibilities.</p> <p>Furthermore, it is the Department's position that "monitoring" can be conducted without an actual onsite visit. Because all after-school programs are required to submit student attendance data electronically and requests for payment are made on a monthly basis, "monitoring" of providers' activities and expenditures occur through desk reviews. The Department will continue its practice of conducting routine desk reviews in addition to regularly scheduled onsite monitoring of all after-school providers.</p>  |                        |
| <b>Recommendation 8:</b> DOE should develop and implement formal policies and procedures that specify its monitoring goals for 21 <sup>st</sup> CCLC, similar to the goals for the CBTP and TANF programs.   | <b>Disagree</b>        |
| <p><b>Response:</b> The Department has established monitoring policies for all of its after-school programs -- including 21<sup>st</sup> CCLC. However, in addition to monitoring, the Department is also responsible for offering training and disseminating information to providers regarding program operations, fiscal compliance, and general grant management. Because many of our providers have no prior experience in operating an after-school program, the Department places emphasis on the provision of technical assistance. It is the Department's policy, after providing technical assistance, to allow the provider an opportunity to make improvements and adjustments <i>prior to</i> conducting a monitoring review.</p> <p>It should also be noted that the Department recently adopted the Louisiana After-school Standards and Measurement of Statewide After-school Programs. The standards allow for evaluation of all after-school programs using a three-pronged approach: (1) academic effectiveness, (2) customer satisfaction, and (3) compliance monitoring results. Because the results of compliance monitoring will be used to rate a provider's performance, all after-school providers will be monitored by Department staff at least once annually.</p> |                        |
| <b>Recommendation 9:</b> DOE should provide web-based training to its providers when possible.   | <b>Agree</b>           |

**Response:** The Department has implemented web-based trainings for after-school providers as well as web-based refreshers on usage of STARS and other database systems. Additionally, the Department convenes quarterly conference calls with providers from each program to offer support in the implementation process.

**Recommendation 10:** DOE should ensure that all orientation and training sessions are timely and that they communicate changes to the after-school programs to providers before they start their programs.

Agree

**Response:** The Department recognizes the need for grantee program staff to participate in high-quality professional development activities and has strived to ensure all professional development is given in a timely manner. The Department hosts regularly scheduled training events for each of its after-school programs on an annual basis. However, the Hurricanes of 2008 and significant changes made to all after-school programs delayed the schedules for training and program implementation.

**Recommendation 11:** DOE, in coordination with BESE and the Office of Contractual Review, should ensure that all contracts are approved prior to providers beginning their programs.

Agree

**Response:** School Support staff meet and communicate regularly with purchasing and contracts staff to ensure the contract approval process moves smoothly for in-house approval by BESE and with the Office of Contractual Review.

**Recommendation 12:** DOE should improve communication between program staff and the finance division.

Agree

**Response:** While there is always room for improvement, it is noted that since June 2008, members from both the School Support section and finance division meet monthly to review grantee expenditure levels (drawdowns). With information gathered from these meetings, program staff is able to target providers that need specialized technical assistance. Additionally, program staff have been able to develop strategies to ensure limited funding is expended in a manner that provides the greatest benefit to the greatest number of children.

**Recommendation 13:** DOE should ensure that CCD's methodology is appropriate and that it produces results that are accurate and reliable so that management will have useful information to use when making programmatic decisions. If CCD cannot provide the necessary information, DOE should develop alternative means of measuring program effectiveness.

Agree

**Response:** The Department works closely with the Center for Child Development (CCD) at the University of Louisiana to ensure the evaluation services will provide valuable and informative results. The method used by CCD is considered a sound methodology and produces results useful for programmatic decisions. The evaluators used a method that is applied by researchers in academic settings. Generalizability, which is the method used in the sample, is defined as the extension of research findings and conclusions from a study conducted on a sample population to the population at large. While the Department realizes the dependability of the results to the general population of after-school programs is not unquestionable, the results are statistically probable and sufficient to produce a broad generalizability. For future work, CCD will assess the effectiveness of all programs – not a sample of programs. By assessing the entire population of after-school providers, the Department can hold providers accountable for activities, and programs with strong performance can be identified and used as best practice models.

**Recommendation 14:** To provide an accurate measure of program effectiveness, DOE should include all program participants, including those in pre-K through 2nd grade and 10th through 12<sup>th</sup> grade, in its comprehensive annual evaluation.

**Partially Agree**

**Response:** The Department has made monumental and significant strides in evaluating the effectiveness of its after-school programs. Because LEAP and iLEAP do not address all grade levels, efforts are currently underway to develop a methodology to assess the academic achievement of all grade levels through pre- and post-testing. In December 2008, BESE approved the Louisiana After-school Standards and Measurement of Statewide After-school Programs. The standards will allow for evaluation of the effectiveness of all after-school programs using a three-pronged approach. Programs will be evaluated on (1) academic effectiveness, (2) customer satisfaction, and (3) compliance monitoring results. Each program will receive a performance label of either Fully Approved, Satisfactory, Probation I, or Probation II based upon a composite score from each of the three areas.