

**DEPARTMENT OF EDUCATION
OFFICE OF THE INSPECTOR GENERAL**

**Assessment of
Public Schools Performance Measures**

**Management Review Number
08/09-02 MR**

May 5, 2009

Background

The Florida Government Accountability Act (Sections 11.901-11.920, Florida Statutes) requires that state agencies establish performance measures and standards.

Section 216.013, Florida Statutes (F.S.), requires that Long-Range Program Plans (LRPP) provide the framework for the development of budget requests and identify or update information regarding performance measurement, which includes, but is not limited to: how data is collected, the methodology used to measure a performance indicator, and the validity and reliability of a measure. Performance standards for each performance measure and justification for the standards and the sources of data to be used for measurement must be included. Performance standards must include standards for each affected activity and be expressed in terms of the associated unit of activity. Prior year performance data on approved performance measures and an explanation of deviation from expected performance is required. Performance data must be assessed for reliability in accordance with Section 20.055, F. S.

Section 20.055, F.S., mandates that it shall be the duty and responsibility of each agency inspector general to:

"Assess the reliability and validity of the information provided by the state agency on performance measures and standards, and make recommendations for improvement, if necessary".

This management review was performed in fulfillment of that requirement.

The Department of Education includes as one of its goals to provide *Quality Efficient Services* and a strategic imperative to *Align Resources to Strategic Goals*. A valid and reliable performance measurement system is essential to determine progress toward achieving this goal.

The Department's Long-Range Program Plan (LRPP) FY 2009/10 – FY 2013/14 is intended to present both the legislatively-approved standard for each measure and the actual outcome. Five active performance measures are listed for the Public Schools Program, however, one measure reporting *Number/Percent of Teachers with National Teacher's Certifications* is recommended for deletion and was not included in this assessment. An additional six measures have been recommended for addition, but were not included in this assessment because approval was pending at the time of this review and standards had not been established.

Scope and Objectives

This management review assessed the validity and reliability of selected legislative performance measures. Our objectives were to: 1) evaluate whether the performance measures relate to the essential mission of the Public Schools Program; 2) verify the accuracy of reported results for selected measures; 3) evaluate the means and methods used to acquire the supporting data for those measures; and 4) evaluate internal controls over the processes employed to determine measure amounts. The scope of our assessment included performance measures as reported for the 2006/07 and 2007/08 reporting periods. We evaluated four of the five approved Public Schools Program measures; one measure relating to national teacher's certification was recommended for deletion and was not covered in this assessment.

We reviewed the following Public Schools Program performance measures:

1. *Number/Percent of "A" Schools, Reported by District.*
2. *Number/Percent of "D" or "F" Schools, Reported by District.*
3. *Number/Percent of Schools Declining One or More Letter Grades, Reported by District.*
4. *Number/Percent of Schools Improving One or More Letter Grades, Reported by District.*

Methodology

For this management review, measure reliability was defined as the extent to which a measuring procedure yields the same results on repeated trials and data was complete and sufficiently error free for the intended use. Measure validity is the appropriateness of the measuring instrument in relation to the purpose for which it is being used and whether measures are meaningful indicators of results achieved by the Department. To achieve our objectives, the auditor: 1) researched and reviewed applicable statutes, rules, manuals, and procedures; 2) interviewed appropriate Department staff; 3) reviewed the LRPP as well as supporting documentation; and 4) calculated amounts for each measure using the source data and methodology defined by the Department.

School grades are available on the Department's Web site and measure results were verified using Excel spreadsheets. The four measures reviewed use the same school grade source data. Individual school grades were not verified due to practical considerations including the time involved in replicating a complex process and the presence of a strong internal control framework.

OIG Standards

This management review was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*, published by the Institute of Internal Auditors.

Assessment Comments

Schools are assigned a grade based primarily upon student achievement data from the Florida Comprehensive Assessment Test (FCAT). School grades communicate to the public how well a school is performing relative to state standards. School grades are calculated based on annual learning gains of each student toward achievement of state standards, the progress of the lowest quartile of students, and meeting proficiency standards.

The Department has established a process for collecting and reporting school grades. A description of this process is available on the DOE Web site. Internal controls related to computing and reporting school grades include:

- An established methodology for developing and scoring the FCAT test. Scoring is monitored by the Bureau of K-12 Assessment in the Division of Accountability, Research, and Measurement by sampling source test books and verifying scoring accuracy by the contractor. Rules for administering the FCAT test in the classroom are provided to school districts.
- Edit and other validity checks on data provided by the school districts are performed in the Bureau of Evaluation and Reporting and the Bureau of Education Information and Accountability Services, Division of Accountability, Research and Measurement.

- Replication of school grade results is provided through contract with the Florida State University Center for Advancement of Learning and Assessment.
- School districts review grades and an appeal process is available for challenging the school grades computed by the Department.

Given that school grades are reported on nearly 3,000 schools in the state (2,892 received grades of A through F in 2008) a risk of error may be associated with the large number of data input points in the system. This is primarily an issue for student enrollment determination. Staff we interviewed indicated that formerly the Department monitored school census (enrollment) data reported by the school districts but due to staff cuts this currently is not done.

Measure Names

Each of the four measure names contain the phrase "*Reported by District*". This would seem to indicate that we would expect 67 lines of data for each measure; one for each school district. Instead, there is only one line of data for the State as a whole which appears to be reasonable. (See LRPP excerpt below.) School grades reported by district and by individual schools are available on the Department's Web site.

Recommendation: The Department should request that the words "*Reported by District*" be deleted from each measure name.

Performance Measure Standards

The following chart is extracted from the DOE FY 2009/10 – FY 2013/14 Long-Range Program Plan, provided on the Department's Web site:

| Approved Performance Measures for FY 2008-09 | Approved Prior Year Standard FY 2007-08 (Numbers) | Prior Year Actual FY 2007-08 (Numbers) | Approved Standards for FY 2008-09 (Numbers) | Requested FY 2009-10 Standard (Numbers) |
|---|---|--|---|---|
| Number/percent of "A" schools, reported by district | 600 / 25% | 1,584 / 54.8% | 600 / 25% | 600 / 25% |
| Number/percent of "D" or "F" schools, reported by district | 300 / 12% | 200 / 6.9% | 300 / 12% | 300 / 12% |
| Number/percent of schools declining one or more letter grades, reported by district | 193 / 8% | 410 / 15.1% | 193 / 8% | 193 / 8% |
| Number/percent of schools improving one or more letter grades, reported by district | 966 / 40% | 698 / 52.3% | 966 / 40% | 966 / 40% |

From this presentation there are clearly large deviations between actual numbers and standards especially for the measures *Number/Percent of "A" Schools ...* (150% deviation between standard: 600/25% and actual: 1,584/54.8%) and *Number/Percent of Schools Declining One or More Letter Grades ...* (112% deviation between standard: 193/8% and actual: 410/15.1%). Deviations of similar or greater magnitude may be seen in the data reported in the previous year's LRPP (FY 2007/08-FY 2011/12):

| Approved Performance Measures for FY 2007-08 | Approved Prior Year Standard FY 2006-07 (Numbers) | Prior Year Actual FY 2006-07 (Numbers) | Approved Standards for FY 2007-08 (Numbers) | Requested FY 2008-09 Standard (Numbers) |
|---|---|--|---|---|
| Number/percent of "A" schools, reported by district | 600 / 25% | 1,477 / 52.1% | 600 / 25% | |
| Number/percent of "D" or "F" schools, reported by district | 300 / 12% | 302 / 10.6% | 300 / 12% | |
| Number/percent of schools declining one or more letter grades, reported by district | 193 / 8% | 757 / 27.6% | 193 / 8% | |
| Number/percent of schools improving one or more letter grades, reported by district | 966 / 40% | 421 / 32.5% | 966 / 40% | |

Exhibit III of the annual LRPP contains explanations for deviations between actual numbers reported and the standards for the performance measures. For the measure *Number/Percent of Schools Declining One or More Letter Grades ...*, a comment for internal difference factors was provided indicating that previous reports contained mathematical errors. Another comment for external difference factors stated that schools are performing better than expected so fewer schools are declining in grade. No explanations were provided in the LRPP regarding the deviation from standard experienced in the measure of *Number/Percent of "A" Schools ...* According to information provided to us the standards currently listed in the LRPP were established some time ago and have not been updated.

Recommendation: The Department should review the standards established for the four performance measures and, if changes to the established standards are appropriate, make the request to the appropriate parties in the Legislature and Governor's Office and, if applicable, note requested changes in the LRPP.

Validity

We reviewed the measure names, data sources and methodology description for consistency and analyzed the data collection and reporting system structure. The measures report on the core mission of the Public Schools Program to maintain an accountability system that measures student progress toward the goal of highest student achievement. Based on our review, the four measures are valid. The measure names should be modified as noted above to match how the numbers are presented (i.e. state-wide vs. by district).

Reliability

We reviewed data sources and methodology description to determine the degree to which measure data can be adequately supported and consistently reproduced. The four Public School Program measures reviewed have the appropriate measure definition, description of the reporting system structure, and data definitions and have been fully implemented based upon program assertions. A system of internal controls is in place. We were able to reproduce the figures reported in the LRPP using school grades available on the Department's Web site. Based on the review, these measures are materially reliable.

As noted above, a risk of error may be associated with the large number of data input points related to student enrollment determination. If resources can be identified, direct monitoring of

student enrollment data reported by school districts would help ensure the reliability of school grade computation.

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MEMORANDUM

DATE: April 17, 2009
TO: Ed W. Jordan, Inspector General
FROM: Linda Champion
SUBJECT: Office of the Inspector General (OIG) Management Review Number 08/09-02 MR

Thank you for the opportunity to review and respond to the **Management Review Number 08/09-02 MR, Assessment of Public Schools Performance Measures**, dated February 9, 2009. As requested, the Division of Finance and Operations is providing comments and additional information related to recommendations in the management review concerning performance measures that were included in the 2009 Long-Range Performance Plan (LRPP) for Fiscal Years 2009-10 through 2013-14. The 2009 LRPP, which includes standards and measures from the 2006 General Appropriations Act, was submitted in September 2008, as required by Chapter 216.013, Florida Statutes, and consistent with instructions from the Executive Office of the Governor.

Recommendation: The Department should request that the words "*Reported by District*" be deleted from each measure name.

Response: This recommendation appears to be a technical concern, which the Department will take into consideration in the preparation of the 2010 LRPP. Since the volume of data makes it unrealistic to report school grades by district, links to the Department's Web site are included in Exhibit IV of the LRPP to provide ready access to school grades for each district. In light of the recommendation, this approach will be examined during the updating process to determine if changes to the measures should be proposed or reporting methods revised. Since the performance measures are authorized by statute, legislative approval will be necessary to make changes in the wording.

Recommendation: The Department should review the standards established for the four performance measures and, if changes to the established standards are appropriate, make the request to the appropriate parties in the Legislature and Governor's Office and, if applicable, note requested changes in the LRPP.

LINDA CHAMPION
DEPUTY COMMISSIONER, FINANCE AND OPERATIONS

Mr. Ed W. Jordan
April 17, 2009
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Response: Since their adoption in 2006, the Department has reviewed all of the performance measures and standards as part of the annual update of the LRPP. This annual review allows the Department to determine which measures or standards may need to be deleted, modified or replaced, as well as to recommend new measures and standards that are valid, reliable, and useful to management and the public. As noted previously, changes to the performance measures or standards will require approval from the Legislature and the Office of the Governor; however, recommendations for revisions are included in the LRPP document along with a rationale for each proposed change.

On January 15, 2008, the Department's Division of Finance and Operations submitted to the Governor a list of the recommended modifications, additions, and deletions to the measures and standards pursuant to Section 2 of Senate Bill 4-C (Chapter 2007-327, Laws of Florida). The 2008 Legislature did not adopt measures and standards for the 2009 update of the LRPP; therefore, the Division of Finance and Operations requested legislative approval of the recommended changes via a budget amendment prior to the most recent update of the LRPP. We continue to work with legislative and other appropriate staff to clarify and resolve the request for changes to the measures and standards.

Should you have further questions or concerns, please contact me. Thank you again for the opportunity to respond to the management review.

LC/pdm