



**UNITED STATES DEPARTMENT OF EDUCATION**  
**OFFICE OF INSPECTOR GENERAL**

Control Number  
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December 1, 2011

Tony Miller  
Deputy Secretary  
U.S. Department of Education  
400 Maryland Avenue, S.W.  
Washington, DC 20202

Dear Mr. Miller:

This **final audit report**, entitled *Potentially Overlapping High School Programs*, presents the results of our audit. The objectives of our audit were to (1) assess the extent to which the Department of Education's (Department) high school programs are duplicative, and (2) determine if the Department has collected data that show whether these programs appear to be effective and efficient in reducing gaps between low-income and minority students and their peers in high school graduation and college access/success.

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## **BACKGROUND**

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The Department establishes policy for, administers, and coordinates most Federal assistance to education. The Department's mission is to serve America's students – more specifically, to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

To facilitate the administration of grant programs authorized and funded by Congress, the Department is organized into a number of Principal Offices (POs). Each PO is responsible for a portfolio of distinct, albeit related, programs and initiatives. For example, the Office of Elementary and Secondary Education (OESE) administers programs designed to assist State and local educational agencies (LEAs) in improving the achievement of elementary and secondary school students, particularly those who are disadvantaged. Programs under the Office of Postsecondary Education (OPE) are intended to address the national need to increase access to quality postsecondary education, strengthen the capacity of colleges and universities, and provide teacher and student development resources. The Office of Vocational and Adult Education (OVAE) oversees programs related to adult education and literacy, career and technical education, and community colleges.

Other POs with significant numbers of grant programs include the Office of Innovation and Improvement (OII), which supports trials of innovations in the education system and broadly disseminates lessons learned; the Office of Safe and Drug-Free Schools (OSDFS), which

provides financial assistance for activities aimed at drug and violence prevention and the promotion of health and well-being of students in elementary and secondary schools and institutions of higher education; and the Office of Special Education and Rehabilitative Services (OSERS), which supports programs that help educate and provide for the rehabilitation of individuals with disabilities, as well as research.

Many of the programs administered by these POs are geared toward high school students, the focus of this audit. As noted in the Department's High-Priority Performance Goals, the President's vision is that "... by 2020, America will again have the best-educated, most competitive workforce in the world with the highest proportion of college graduates of any country. To do this, the United States must also close the achievement gap, so that all youth – regardless of their backgrounds – graduate from high school ready to succeed in college and careers." Among the related educational outcomes listed are improving all states' overall and disaggregated high school graduation rates and improving the nation's overall and disaggregated college completion rate.

To inform its efforts concerning high school programs, the Office of the Deputy Secretary requested that the Office of Inspector General (OIG) perform work that would answer the objectives previously stated on page 1.

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## AUDIT RESULTS

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Our audit found that while none of the Department's high school-related programs appears to be duplicative, there is some overlap among programs. Specifically, we noted that 6 of the 18 (33 percent) high school-related programs that we identified appear to overlap with at least one other program. We also noted that a number of the programs we reviewed, to include all six of the programs we noted that appear to overlap with other high school programs, have been proposed for elimination and/or consolidation in past Department budget submissions as well as its most recent Elementary and Secondary Education Act reauthorization proposal, partly due to concerns over duplication with other programs.

We found that, although the Department has collected performance data on the 18 programs included in our review, it has not collected data or established performance measures specifically related to the programs' effectiveness in reducing gaps between low-income and minority students and their peers in high school graduation and college access/success. However, although data on all of these programs' effectiveness in closing achievement gaps is unavailable, we noted that eight of the programs (44 percent) do have measures that require the collection of data specific to low-income and minority student performance with regard to high-school graduation rates or college access/success among program participants. The Department may be able to further use such data to determine program impact on reductions in achievement gaps.

Of these eight programs, we noted that five (63 percent) – Advanced Placement Incentive Program (APIP), Advanced Placement Test Fee Program (APTF), Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP), Talent Search, and Upward Bound Math-Science (UBMS) – appear to generally be showing positive results regarding high school graduation rates or college access/success in the noted populations, based on a review of available Departmental performance data. Conversely, three of the programs – Migrant Education-High School Equivalency Program (ME-HEP), Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk (N-D), and Upward Bound (UB) – may not be producing such results.

In its response to the draft audit report, the Office of the Deputy Secretary (ODS) agreed with the recommendations and described corrective actions planned. ODS stated it appreciated OIG’s insight and would continue to examine whether the Department’s support for high schools is configured to have the most positive effects for students. ODS also noted that it did not believe that program overlap is inherently undesirable, and believed that the clarity and accuracy of the report would be improved by providing further information or explanation in some areas. After reviewing the comments, we have modified some areas of the report to provide further clarity as requested. We have also modified recommendation 1.3 to recognize that the Department is limited by statute in its ability to prevent grantees from receiving funding under similar programs. The recommendation now focuses exclusively on efforts that could assist in ensuring students are not over-served by similar programs. Other than the modifications noted we have not made any additional changes to our findings and recommendations. ODS’ comments are summarized at the end of each applicable finding. The full text of ODS’ response is included as Attachment 5 to this report.

## **FINDING NO. 1 – Overlap Exists Among Some Department High School Programs**

Our audit found that while none of the Department’s high school-related programs appears to be duplicative, there is some overlap between programs. Specifically, we noted six high school-related programs that appear to overlap with at least one other program.

We identified a total of 18 Department grant programs<sup>1</sup> that either serve high school students only (directly or indirectly) or include them as a primary target population. Eight of these programs are administered by OESE, five by OPE, two each by OVAE and OII, and one by OSDfS. [See Attachment 1 for more detailed information on these programs.]

While each of the 18 programs reviewed contain some unique characteristics, we found that they can be grouped, essentially, into two main categories: (1) those with a focus on one subject area or on a specific subpopulation of students; and (2) those with a broad focus on encouraging high school graduation and/or promoting college access/success, primarily (but not solely) among low-income and minority students. The latter category can also be subdivided into programs that

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<sup>1</sup> For purposes of this audit, a “grant program” was defined as any program with a separate listing in the Department’s “Guide to Education Programs” and/or a unique Catalog of Federal Domestic Assistance number.

relate to career and technical education (administered by OVAE) and programs focused mainly on academic preparation for postsecondary education (administered by OESE and OPE). As shown in Table 1 below, we identified nine programs that fall under the “Specific Subject Area or Subpopulation” category (Category A), and nine programs that fall under the “High School Graduation and/or College Access/Success” category (Category B). The nine programs included under Category A have more narrowly-focused goals, objectives, and performance measures, and/or are targeted toward certain, often hard to reach, subpopulations. These programs are also generally smaller, in terms of annual funding, than those included in Category B and, despite sharing some similarities, offer fundamentally different services to unique populations. As a result, there appeared to be little potential for substantial overlap or duplication with the other high school programs. We subsequently focused our work on assessing the extent to which this occurs between programs included under Category B.

<b>Category A Specific Subject Area or Subpopulation</b>	<b>Category B High School Graduation and/or College Access/Success</b>
Advanced Placement Incentive Program (APIP) (D)	High School Graduation Initiative (HSGI) (D)
Advanced Placement Test Fee Program (APTF) (D)	School Improvement Grants (SIG) (F)
Migrant Education-High School Equivalency Program (ME-HEP) (D)	Smaller Learning Communities (SLC) (D)
Prevention and Intervention Programs for Children and Youths Who Are Neglected, Delinquent, or At Risk (N-D) (F)	College Access Challenge Grants (CACG) (F)
Striving Readers (D)	Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) (D)
American Academies for History and Civics (AAHC) (D)	Talent Search (D)
Close Up Fellowship Program (Close Up) (E)	Upward Bound (UB) (D)
Grants to Reduce Alcohol Abuse (GRAA) (D)	Career and Technical Education (CTE)* (F)
Upward Bound Math-Science (UBMS) (D)	Tech Prep Education (Tech Prep)* (F)
<b>9</b>	<b>9</b>
“D” denotes discretionary grant programs, “E” denotes earmarks or Congressionally-directed programs, and “F” denotes formula grant programs and noncompetitive discretionary grant programs. * Denotes programs related to career and technical education administered by OVAE.	

Table 2 shows additional detail on the nine OESE, OPE, and OVAE high school programs included under Category B above that we identified as having a broad focus on encouraging high school graduation and/or promoting college access/success.

<b>Table 2: High School Graduation and/or College Access/Success</b>				
<b>Program Name</b>	<b>PO</b>	<b>Program Office<sup>2</sup></b>	<b>Goal</b>	<b>Target Population</b>
High School Graduation Initiative	OESE	AITQ	To support effective, sustainable, and coordinated statewide school dropout prevention and reentry programs.	Students in schools with high dropout rates
School Improvement Grants	OESE	SASA	To improve student achievement in Title I schools identified for improvement, corrective action, or restructuring so as to enable those schools to make adequate yearly progress (AYP) and exit improvement status.	Students in low-performing schools
Smaller Learning Communities	OESE	AITQ	To assist high schools in creating smaller learning communities that can prepare all students to achieve to challenging standards in college and careers.	Students in large schools
College Access Challenge Grant	OPE	HEP/State Service	To increase the number of low-income students prepared to enter and succeed in postsecondary education by fostering partnerships among Federal, state, and local governments and philanthropic organizations through matching challenge grants.	Low-income students
Gaining Early Awareness and Readiness for Undergraduate Programs	OPE	HEP/Student Service	To significantly increase the number of low-income students who are prepared to enter and succeed in postsecondary education.	Low-income students
Talent Search	OPE	HEP/Student Service (TRIO)	To increase the percentage of low-income, first-generation college students who successfully pursue postsecondary educational opportunities.	Low-income, potentially first-generation college students
Upward Bound	OPE	HEP/Student Service (TRIO)	To increase the percentage of low-income, first-generation college students who successfully pursue postsecondary educational opportunities.	Low-income, potentially first-generation college students
Career and Technical Education	OVAE	DATE	To increase access to and improve educational programs that strengthen education achievement, workforce preparation, and lifelong learning.	All students
Tech Prep Education	OVAE	DATE	To increase access to and improve educational programs that strengthen education achievement, workforce preparation, and lifelong learning.	All students

<sup>2</sup> Refer to Attachment 4 for definition of noted acronyms.

All seven of the OESE and OPE programs contain elements that are designed to improve student academic achievement, encourage high school graduation, and promote college access/success – although the degree to which each of these activities occurs varies from program to program. HSGI, SIG (in part), SLC, and GEAR UP are typically thought of as having a more pronounced effect on the first two areas, while CACG, Talent Search, and UB provide a link between secondary and postsecondary education. Both of the OVAE programs, CTE and Tech Prep, promote the integration of academic, career, and technical education between secondary and postsecondary schools.

In conducting our audit, we identified essentially four areas where overlap can occur: (1) program goals, objectives, and performance measures; (2) target population; (3) services provided; and (4) the manner in which services are provided. We established that to be duplicative, a program would have to match another program in all four areas. We noted that none of the programs could be deemed duplicative; however, six of the nine programs (67 percent) appear to overlap to varying degrees with at least one other program, as follows:

- CACG, GEAR UP, Talent Search, and UB: This group of programs provides similar services to similar target populations, including assistance in the college admissions process and academic, career, and financial counseling. Talent Search and UB are especially alike, in that both are discretionary grant programs that target individual students; share the exact same goal, objective, and performance measures; and, according to the Department’s Fiscal Year (FY) 2012 TRIO<sup>3</sup> Budget Justification, provide the same services (although UB also provides an on-campus residential summer component and work-study positions). The main difference between these two programs, as described to us by program officials, is in the level of intensity of services provided and, subsequently, impact observed. Talent Search is a “light touch” program, focused primarily on the various types of counseling described above, that served 360,000 individuals in FY 2010, at a cost to the Federal government of approximately \$400 per participant. UB, on the other hand, offers a more comprehensive program, to include academic instruction in various subjects in addition to the counseling described above, and provided services to 53,000 participants valued at almost \$5,000 per participant. The number of participants per project also differs significantly, averaging about 780 for Talent Search and 80 for UB. Lastly, Talent Search can provide services to middle school students, while UB focuses on high school students only.
- CTE and Tech Prep: Both programs share a common goal, service the same target population, and report on identical performance measures in the Department’s performance reporting system and annual budget justifications to Congress. They differ somewhat in how the goal is achieved – with CTE implemented within individual school districts, in accordance with local and State plans, while Tech Prep, although also part of

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<sup>3</sup> The Federal TRIO Programs are Federal outreach and student services programs designed to identify and provide services for individuals from disadvantaged backgrounds. TRIO includes eight programs targeted to serve and assist low-income individuals, first-generation college students, and individuals with disabilities to progress through the academic pipeline from middle school to postbaccalaureate programs. We included three of the programs (Talent Search, UB, and UBMS) for review as a part of this audit because they are focused specifically on high school students.

local and State plans, requires the use of articulation agreements<sup>4</sup> between consortia of schools – but nevertheless strive toward the same goal. Officials with whom we spoke readily acknowledged overlap. They noted that Congress included a provision in the 2006 reauthorization of the Carl D. Perkins Career and Technical Education Act (Perkins IV) that allows States to consolidate their CTE and Tech Prep funds. In its FY 2012 Tech Prep Budget Justification, the Department reported that 28 States consolidated at least a portion, and generally all, of their Tech Prep funds into the CTE program.

We noted that the Department did not request separate funding for Tech Prep in its last two budget submissions. Rather, it proposed redirecting, or consolidating, funding for the program into CTE in order to give States and local entities more flexibility in allocating funds. The final FY 2011 appropriation eliminated funding for Tech Prep, effectively terminating the program; however, the possibility exists that funding could later be restored.

Government Accountability Office (GAO) “Standards for Internal Control in the Federal Government” states

Internal control should provide reasonable assurance that the objectives of the agency are being achieved in the following categories:

- Effectiveness and efficiency of operations including the use of the entity’s resources.

The Department of Education Organization Act, P.L. 96-88, Section 102, states that among the purposes of the Department’s mission are to

- Improve the coordination of Federal education programs;
- Improve the management of Federal education activities; and
- Increase the accountability of Federal education programs to the President, the Congress, and the public.

### Proposals for Congressional Action

We noted that a number of the programs we reviewed, to include all six of the programs we noted above that appear to overlap with other high school programs, have been proposed for elimination and/or consolidation in past Department budget submissions as well as its most recent Elementary and Secondary Education Act (ESEA) reauthorization proposal. Among the Department’s reasons for eliminating or consolidating programs are that the program: (1) is too

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<sup>4</sup> An articulation agreement is an officially approved agreement that matches coursework and/or governs the transfer of credits between schools. In the case of Tech Prep, each project is carried out under an articulation agreement between participants in a consortium and consists of at least 2 years of high school followed by 2 years or more of higher education or apprenticeship. The idea is to develop a structural link between secondary and postsecondary institutions that integrates academic and career and technical education and better prepares students to make the transition from high school to college and from college to careers.

small to have a significant impact nationally, (2) duplicates other programs, (3) has achieved its intended purpose, (4) has consistently failed to achieve its intended purpose, or (5) would be more appropriately financed by State and local agencies and the private sector. However, until recently, Congress has for the most part continued to fund these programs. The final FY 2011 appropriation, enacted in April 2011, eliminated funding for five of the programs in our review: (1) SLC, (2) Striving Readers, (3) AAHC, (4) Close Up, and (5) Tech Prep.

Attachment 2 shows the programs in our review that have been proposed by the Department for elimination and/or consolidation in recent years.

### Coordination Efforts

While the Department has made some improvements in coordination efforts among its high school programs, additional improvements are needed. Specifically, we noted that the Department's current efforts might be strengthened by placing a greater emphasis on encouraging coordination between program offices regarding administrative and operational matters.

During our audit, we learned that a group referred to as the Secondary Schools Working Group (SSWG) began meeting in November 2009. The group's purpose is to review programs and policies within the Department, with a focus toward improving coordination between program offices, as well as to discuss promising initiatives and best practices underway in high schools across the country. Based on our audit work, it appears as though much more time and attention has been afforded to the second stated objective, with SSWG's main product thus far being a document submitted to the Department's Policy Committee that identifies overarching goals for the nation's high schools and high school students, significant challenges, and short and long-term strategies for achieving these goals.

SSWG participants, who include political appointees and career staff from most of the Department's POs, met weekly from November 2009 until June 2010, and began meeting again starting in December 2010. Each meeting is normally devoted to one or two special topics, with outside experts often brought in to discuss related issues. POs also sometimes give presentations on their high school programs and provide news that may be of value to group members. During our discussions, however, we learned that many of the officials who administer the programs in our review were either unaware of the SSWG or were aware of its existence but did not attend meetings. Others stated that they had attended meetings in the past, but have not done so on a regular basis.

We discovered that there have been other largely informal efforts at coordination among related programs as well. OPE recently underwent a reorganization that placed GEAR UP and Talent Search in the same program office, thus allowing staff – who will be assigned grants under both programs – to collaborate more directly to achieve related goals and objectives. Similarly, five of the OESE programs on our list are administered by OESE/AITQ's High School Programs Group. Most of the group's staff work on multiple programs and are thus well-positioned to identify inconsistencies if the same grantee submits an application for funding under multiple, similarly-focused grant programs. They also have a better chance of preventing a potential



grantee from using funds awarded under different grants for the same activity, which can be determined during the application cost analysis and budget review. OESE maintains a file identifying all schools served under its grants to keep track of where funds are being spent – an activity that we determined OPE also performs. As for coordination with other offices, officials described working with GEAR UP, in particular, in an effort to mitigate potential overlap.

Overlapping programs increase the administrative burden on Department staff, as each program has its own legislative and regulatory requirements, as well as application, award, and reporting requirements. Eliminating or combining programs could help reduce the number of award competitions, simplify the preparation of program guidance and materials, and perhaps most importantly, allow the Department to more efficiently and effectively focus resources on monitoring and oversight activities. Many of the program officials that we met with during this audit stated that they wished they had more time for monitoring activities.

In addition, administering overlapping programs that do not appear to be effectively performing or producing a positive impact allows funds to continue to be used for programs that may provide little or no added value. Some of the programs we identified as overlapping and that have been previously recommended by the Department for elimination or consolidation continue to be funded, even though the most recently available performance results and evaluations indicate that the programs may not be realizing their goals and objectives. Specifically, the UB program was rated as ineffective in its Program Assessment Rating Tool (PART) review and was noted as having limited to no effect on its overall population of students in related studies.<sup>5</sup> CTE was also rated as ineffective in its PART review and shown to have mixed or inconclusive results in related studies. [See Finding No. 2 for additional information.]

Overlapping programs can also increase the burden on grantees with regard to administration and oversight. In addition, the risk exists that grantees are receiving multiple related awards and potentially providing overlapping services to the same students and/or schools while other qualifying students and/or schools are overlooked.

At the grantee level, we noted 168 instances of a single grantee receiving funds under both the Talent Search (with 265 grants awarded between FYs 2007 and 2011) and UB (with 967 grants awarded during this same time period) programs.<sup>6</sup> For those grantees where funds were received under multiple programs, we found 54 instances where the same Project Director was listed in the Department's Grant Award Database. We note that the authorizing statute specifically permits grantees to receive funds under both programs at the same time. We also note that the Office of Planning, Evaluation and Policy Development (OPEPD)/Policy and Program Studies Service (PPSS) recently contracted for a study that will analyze Department data and grantee

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<sup>5</sup> PART was designed and implemented under the previous Administration to help assess the management and performance of Federal programs. It was used by the Department and the Office of Management and Budget (OMB) to evaluate a program's purpose, design, planning, management, results, and accountability to determine its overall effectiveness. The current Administration has opted not to continue to use this particular tool, instead promoting a focus on transparency and accountability throughout the Federal government and an increased emphasis on rigorous, independent program evaluations.

<sup>6</sup> Number of grants awarded under each program includes new grants with actual award dates noted between FY 2007 and FY 2011 in the Department's Grant Award Database.

performance reports to determine the extent to which there is overlap in schools with GEAR UP and UB grants.

## **Recommendations**

We recommend that the Deputy Secretary:

- 1.1 Continue to actively promote coordination among similar programs, ensure that key staff are aware of such efforts and encouraged to participate, refocus some of the Department's current efforts to better reflect coordination efforts, emphasize coordination as relating to administrative and operational matters, and consider formalizing other notable informal coordination efforts.
- 1.2 Continue to work with Congress to consolidate or eliminate programs that overlap with one another, with an emphasis on those that do not appear to be achieving intended results.
- 1.3 Ensure monitoring efforts at schools, local education agencies and/or grantees include a review of program participant listings to help ensure that students are not being over-served by similar programs and services to the detriment of other eligible students that could also benefit from such programs and services.

## **Department Comments**

In its comments to the draft audit report, ODS stated that while it was encouraged that no instances of program duplication were identified, it will nevertheless continue to examine whether the Department's support for high schools is configured to have the most positive effects for the nation's students. ODS also stated, however, that it does not believe program overlap to be inherently undesirable, provided that services offered under similar programs are complementary and coordinated to the extent possible. Additionally, ODS cited areas in which it believed the clarity and accuracy of the report could be improved upon by providing further information or explanation, particularly with regard to the differences in intensity of services provided between the Talent Search and UB programs.

ODS agreed, in general, with all of our recommendations, stating that it will continue to promote coordination among similar high school programs through the SSWG and by other means, such as a CTE Strategy Workgroup established in summer 2010, in an effort to improve administrative efficiency and overall program impact. It also referenced both its annual budget development process and the Administration's ESEA reauthorization proposal, which serve as vehicles for the identification of programs that are duplicative or not achieving intended results and contain suggestions to Congress concerning program consolidation and elimination. Lastly, ODS stated that it agrees in principle with the idea that students should not be over-served by Federal education programs. However, it noted that the authorizing statute for the TRIO programs – a significant component of our review – specifically permits an entity to receive multiple grants under different programs. Consequently, although Department staff track whether entities are receiving multiple related grants, their ability to prevent potential service overlap – particularly between the Talent Search and UB programs – is somewhat limited.

## OIG Response

While we agree that some degree of overlap between programs may not always be undesirable or entirely preventable, we encourage the Department to continue its efforts to identify such programs, explore opportunities for collaboration and coordination, and consider consolidation or elimination where appropriate. As ODS noted in its comments, reducing and eliminating duplication is a key step toward increasing efficiency and productivity.

After reviewing ODS' comments, we have modified some areas of Finding 1 to provide further clarity. We have also modified recommendation 1.3 to recognize that the Department is limited by statute in its ability to prevent grantees from receiving funding under similar programs. The recommendation now focuses exclusively on efforts that could assist in ensuring students are not over-served by similar programs.

### **FINDING NO. 2 – Performance Measures and Available Data on the Reduction of Gaps Between Low-Income and Minority Students and Their Peers Are Lacking**

We found that, although the Department has collected performance data on the 18 programs included in our review, it has not collected data or established performance measures specifically related to the programs' effectiveness in reducing gaps between low-income and minority students and their peers in high school graduation and college access/success. However, although data on all of these programs' effectiveness in closing achievement gaps is unavailable, we noted that eight programs (44 percent) do have measures that require the collection of data specific to low-income and minority student performance with regard to high-school graduation rates or college access/success among program participants. The Department may be able to further use such data to determine program impact on reductions in achievement gaps. We noted that not all of the remaining 10 programs would necessarily have similar measures or results, as some programs are newly-authorized or reauthorized, such that final measures have not yet been established or reported on, or programs are narrowly-focused on unique subpopulations of students.

Of the eight programs with measures concerning low-income and/or minority student performance in these areas, we noted that five (63 percent) – APIP, APTF, GEAR UP, Talent Search, and UBMS – appear to generally be showing positive results, based on a review of available Departmental performance data. Conversely, three of the programs – ME-HEP, N-D, and UB – may not be producing such results.<sup>7</sup> In addition, we noted that some of the performance data available, particularly in terms of reports posted on program websites, are dated; in other cases, data are unavailable.

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<sup>7</sup> Of these eight, three – GEAR UP, UB, and Talent Search – were identified under Finding No. 1 as potentially overlapping programs.

Available Performance Data

Based on our review of available Departmental documentation and discussions with Department officials, we determined that there are four main sources for information on program effectiveness and efficiency: (1) annual performance plans/reports, to include data provided in the Department’s yearly budget justifications; (2) PART reviews, instituted in the early 2000s and administered by OMB; (3) evaluations conducted by the Institute of Education Sciences (IES); and (4) evaluations conducted by OPEPD/PPSS.<sup>8</sup>

Table 3 shows what information is currently available for each of the 18 programs reviewed as part of this audit, as well as which programs were specifically identified as having performance measures relating to low-income and minority student high school graduation rates and/or college access/success (in bold). It does not include any evaluations that may currently be underway.

<b>Table 3: Available Performance Data / Low-Income and/or Minority Student Performance Measures</b>					
<b>Program Name</b>	<b>Annual Performance Plan/Report</b>	<b>Low-Income and/or Minority Student Performance Measures</b>	<b>PART Assessment</b>	<b>IES Evaluation(s)</b>	<b>OPEPD/PPSS Evaluation(s)</b>
<b>APIP</b>	✓	✓	✓		
<b>APTF</b>	✓	✓	✓		
HSGI					
<b>ME-HEP</b>	✓	✓	✓		
<b>N-D</b>	✓	✓	✓		
SIG					
SLC	✓		✓		✓
Striving Readers	✓			✓	
AAHC	✓				
Close Up	✓				
CACG					
<b>GEAR UP*</b>	✓	✓	✓		✓
<b>Talent Search*</b>	✓	✓	✓		✓
<b>UB*</b>	✓	✓	✓		✓
<b>UBMS*</b>	✓	✓			✓
GRAA	✓				
CTE	✓		✓		✓
Tech Prep	✓		✓		✓
<b>18</b>	<b>15</b>	<b>8</b>	<b>10</b>	<b>1</b>	<b>7</b>

\* Denotes programs for which we located more than one OPEPD/PPSS evaluation.

For the eight programs identified as having measures concerning low-income and/or minority student graduation rates and/or college access/success, we further reviewed detailed data on

<sup>8</sup> Our review did not include evaluations conducted by external entities. We included only those data sources that were prepared by the Department or for which the Department played a key role in the development process.

program effectiveness and efficiency included in each of the above noted data sources. A summary of our review is presented in Table 4 below and the related narrative that follows.

<b>Table 4: Summary of Program Performance Data<sup>9</sup></b>					
<b>Program Name</b>	<b>Percent of Effectiveness Targets Met/Exceeded &amp; Percent of Targets Showing Progress Over Previous Year</b>	<b>Percent of Efficiency Targets Met/Exceeded &amp; Percent of Targets Showing Progress Over Previous Year</b>	<b>PART Rating &amp; Program Results Score</b>	<b>IES Evaluation Results</b>	<b>OPEPD/PPSS Evaluation Results</b>
APIP	100%; 100% (2010)	~	Moderately Effective; 42% (2005)	None	None
APTF	25%; 75% (2010)	100%; 100% (2008)	Moderately Effective; 42% (2005)	None	None
ME-HEP	50%; 100% (2010)	n/a;* 0% (2009)	Results Not Demonstrated, 0% (2004)	None	None
N-D	0%; 0% (2009)	0%; 0% (2009)	Adequate; 33% (2007)	None	None
GEAR UP	71%; 29% (2008/2009)	^	Adequate; 13% (2003)	None	Too early to tell; inconclusive. (2003) / Generally positive effect. (2008)
Talent Search	100%; 100% (2009)	n/a;* 100% (2009)	Moderately Effective; 50% (2005)	None	Mixed; inconclusive. (2004) / Generally positive effect. (2006)
UB	100%; 100% (2009)	n/a;* 100% (2009)	Ineffective; 16% (2002)	None	Generally limited to no effect. (2004) / Generally limited to no effect. (2009)
UBMS+	100%; 100% (2009)	n/a;* 100% (2009)		None	Generally positive effect. (2006) / Generally positive effect. (2010)
<p>~ The efficiency measure for the AP programs appears to relate only to APTF.                      * Although ME-HEP, Talent Search, UB, and UBMS have established efficiency measures and reported data for a number of years, they do not provide annual targets.                      ^ The Department's FY 2012 GEAR UP Budget Justification identifies its efficiency measure as "... the cost of a successful outcome, where success is defined as enrollment in postsecondary education by GEAR UP students immediately following high school graduation." However, it also notes that the Department has not yet determined how to calculate this measure.                      + Disaggregated UB and UBMS data is provided in OPE's annual grantee-level performance results report.</p>					

<sup>9</sup> Where applicable, the year of the most current data available at the time of our review is noted.

### Annual Performance Reports

In reviewing available performance data, we sought to determine not only whether a program had met the targets established for its performance measures, but also whether it showed progress over the previous year. We reasoned that this information, taken together, would provide a more comprehensive and accurate picture as to whether results are trending positive or negative. With regard to program effectiveness, we noted that two programs that did not meet all of their most recent targets did, in fact, show improvement [APTF; ME-HEP]. We also noted one program where the opposite is true [GEAR UP]. With regard to program efficiency, we found the Department did not have available data for two of the eight programs in our review [APIP; GEAR UP]. In addition, four of the programs that established efficiency measures did not provide annual targets, thus preventing us from noting whether targets were met/exceeded or not met [ME-HEP; Talent Search; UB; UBMS]. We were, however, able to note whether progress was made over the previous year, as these programs did report historical data. Of the six programs with an efficiency measure(s), one met its target [APTF] and three others showed some improvement over the previous year [Talent Search; UB; UBMS].

We noted that the Department does not report separately on UBMS in its annual TRIO budget justifications, nor include such results in its performance reporting system. Rather, data are aggregated with the results for regular UB. However, the Department does include disaggregated results for each program in its annual grantee-level performance results report, the most recent of which (2008-2009) was provided by OPE.

Lastly, we noted that not all of the performance data available are timely. This is particularly true when viewing reports posted on program websites, many of which have not been updated for several years. Although there may be valid reasons for why this occurs, including that it likely takes longer for larger programs with more grantees to collate data, there is also an overarching need for increased transparency and accountability.

### PART Assessments

We reviewed applicable PART questionnaires for the seven programs that had assessments performed. We found that two of the programs were rated “Adequate” [N-D; GEAR UP], three were rated “Moderately Effective” [APIP; APTF; Talent Search], one was rated “Ineffective” [UB], and one was rated “Results Not Demonstrated” [ME-HEP].<sup>10</sup> In addition, none of the programs scored over 50 percent on the program results section of the assessment. This section focused on results that programs can report with accuracy and consistency, and itself accounted for half of a program’s overall score. One program in our review scored 0 percent [ME-HEP] and two others scored under 20 percent [GEAR UP; UB]. These results suggest that there may be deficiencies with regard to the programs’ ability to achieve both short- and long-term performance goals. However, it should be noted that all of the PART reviews were conducted between 2002 and 2007 and may not represent the most current information on these programs. IES officials also expressed concern that the quality and rigor of the evaluation evidence on

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<sup>10</sup> According to the PART website, a rating of “Results Not Demonstrated” is given when a program – regardless of its overall score – does not have agreed-upon performance measures or lacks baselines and performance data.

which the PART reviews were based varies significantly across programs, a sentiment echoed by other officials throughout the Department.

### IES and OPEPD/PPSS Evaluations

Two separate offices are currently responsible for program and policy evaluation at the Department: (1) IES, through its National Center for Education Evaluation and Regional Assistance, which was established in 2002 as the successor to the Office of Educational Research and Improvement; and (2) OPEPD/PPSS, formerly known as the Planning and Evaluation Service. Department officials in each office described the differences between the two as follows: OPEPD/PPSS is focusing on short-term evaluation activities (fewer than 18 months), policy analysis, performance measurement, and knowledge management activities, while IES is responsible for longer-term (18 months or longer) program implementation and impact studies.

We noted that four of the eight programs (50 percent) did not have any evaluations performed by either IES or OPEPD/PPSS [APIP; APTF; ME-HEP; N-D]. Of the four that did, three were noted as having a generally positive effect [GEAR UP; Talent Search; UBMS] and one was noted as having limited to no effect for participants as a whole [UB]. We also learned that the Department is in the process of completing its analysis of data collected through evaluation activities related to the GEAR UP and UB programs to determine if they provide information that would be useful for program improvement.

Departmental Directive OS-01, "Handbook for the Discretionary Grant Process," dated January 26, 2009, states

The Government Performance and Results Act of 1993 directs Federal departments and agencies to improve the effectiveness of their programs by engaging in strategic planning, setting outcome-related goals for programs, and measuring program results against those goals. ... ED must establish meaningful performance standards and measurements for its programs so that it can provide evidence to OMB that its programs are effective as rated by the PART.

OMB Memorandum 10-32, "Evaluating Programs for Efficacy and Cost-Efficiency," dated July 29, 2010, states

Rigorous, independent program evaluations can be key resources in determining whether government programs are achieving their intended outcomes as effectively as possible and at the lowest possible cost. Evaluations can help policymakers and agency managers strengthen the design and operation of programs. ... Ultimately, evaluations can help the Administration and Congress determine how to spend taxpayer dollars effectively and efficiently, by investing taxpayers' resources in what works.

We noted that programs may not have related data or measures due to the fact that they do not have goals and objectives that specifically reference low-income and/or minority students. As a result, the Department has not established performance measures that would enable it to measure

and report on the programs' success as relating to these populations and allow it to subsequently use the data in analyses related to the effectiveness of the programs in closing achievement gaps. Three of the programs – HSGI, SIG, and CACG – are relatively new programs, for which performance measures are in the process of being developed, according to program officials.<sup>11</sup> Of these, only CACG, which is administered by OPE, includes language in its program goal to address increasing the number of low-income students who are prepared to enter and succeed in postsecondary education. The other two, administered by OESE, are not specifically targeted toward low-income and/or minority students, but, rather, will be implemented in low-performing schools and schools with high dropout rates. Nevertheless, these programs – one of which focuses almost exclusively on at-risk and out-of-school youth and the other of which employs a comprehensive approach to school improvement that addresses issues concerning students, teachers, administrators, and the schools themselves – will have notable coverage with respect to these populations of students. We reviewed performance measures contained in the FY 2010 HSGI Notice Inviting Applications and October 2010 SIG Notice of Final Requirements and noted that it appears the Department intends to collect data on performance by student subgroup. However, it remains to be seen whether aggregated or disaggregated data will be reported in annual performance reports and budget justifications.

The CTE and [former] Tech Prep programs both have a broad focus on high school graduation and college access/success and, despite noting some efforts at disaggregating results for “special populations” of students, do not have national measures reflected in the Department’s performance reporting system or annual budget justifications that would require reporting separately on the performance of low-income and/or minority students. Some programs, such as GRAA (and, until recently, Striving Readers, AAHC, and Close Up), are very narrowly-focused programs that do not necessarily lend themselves to measures that would require the collection of data on low-income and minority students to potentially determine their effectiveness in closing achievement gaps in high school graduation and college access/success.

As for areas in which program evaluations are lacking, IES and OPEPD/PPSS officials reiterated the same point made by a number of program officials: most of the Department’s high school programs are relatively small and do not include set-asides of sufficient size to permit IES to conduct rigorous evaluations, each of which can cost between \$5 million and \$15 million and take multiple years to complete. They noted it is not cost-effective to spend more on program evaluations than on the programs themselves. Further, IES officials stated that although some programs have national activities accounts from which funds can be allocated for evaluations, resources are generally either limited relative to the size of the program or used by the office for other purposes.

It was noted that most of the work that is done is conducted under grants awarded by the National Center for Education Research or National Center for Special Education Research and is organized around topics or strategies in education, as opposed to specific Federal programs. Further, studies conducted by IES are generally initiated at the request of the program office, so

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<sup>11</sup> HSGI was first funded in FY 2010, as the successor to the previously unfunded School Dropout Prevention Program. SIG was first funded in FY 2007, however the Department recently redefined the program to include a stronger focus on high schools. CACG was first funded in FY 2008 as a 2-year temporary program. In FY 2010, the program was extended for an additional 5 years.



if this does not occur, and if there is no set-aside of sufficient size, as noted above, a program may go unevaluated. Officials also stated that work aimed at determining the overall effectiveness of the TRIO programs, in particular, will likely prove much more difficult going forward, in light of new restraints on rigorous evaluations contained in the Higher Education Act (HEA). It was noted that Section 402H of the HEA effectively prohibits randomized controlled trials and requires that any evaluations focus primarily on the identification of effective program or project practices, as opposed to comprehensive assessments of program performance.

Programs that lend themselves to but do not have measures specifically related to the performance of low-income and/or minority students provide limited opportunity for insight into the effect that these programs may be having on reducing historically persistent achievement gaps and prevent the Department and grantees from identifying areas of needed improvement. Further, a lack of or dated performance information and evaluations, including results on both program effectiveness and efficiency, hinders the Department's ability to determine whether a program is achieving its intended purpose and goals in a cost-effective manner and to take necessary action if warranted.

We noted that the Department is in the process of soliciting requests for proposals for a contract intended to improve the quality and reporting of outcomes and impact data from its grant programs. This effort will be overseen by OPEPD and represents a continuation and strengthening of the Data Quality Initiative project, which began in 2006. The contractor will be tasked with providing technical assistance to Department program offices and their grantees regarding the design and conduct of program evaluations. Other responsibilities will include helping program offices structure their grant competitions to encourage grantees to plan for and collect more accurate and meaningful performance data and providing data collection and analytical assistance to program offices in the preparation of annual reports.

## **Recommendations**

We recommend that the Deputy Secretary:

- 2.1 Establish performance measures related to low-income and minority student performance with regard to high school graduation and college access/success rates in applicable programs.
- 2.2 Use the data collected from the performance measures above to analyze the effect that these programs are having on closing achievement gaps.
- 2.3 Ensure that related performance data are available and are as current as possible to enable analysis on whether programs are achieving their intended outcomes as effectively as possible and at the lowest possible cost and to inform future proposals on program eliminations and consolidations.

## **Department Comments**

ODS did not explicitly agree or disagree with Finding No. 2, but commented that it believed the opening statement, as originally presented, to be open to interpretation and potentially misleading and provided suggested revised language. ODS also stated that its ability to collect, for comparison purposes, data on the peers of the low-income and minority students served by its high school discretionary grant programs is limited by funding and other constraints, rendering implementation of performance measures that examine local gaps in achievement or attainment generally unfeasible.

Much of the remainder of ODS's comments related to OIG's conclusions on the effectiveness, or possible lack thereof, of some of the programs included in our review. ODS questioned the basis on which some of these determinations were made, specifically citing the ME-HEP and UB programs, noting that improvement on performance measures would seem to reflect positive results and also noting limitations regarding the usefulness of PART reviews. ODS also stated that more recent performance data was now available for the N-D program that would impact OIG's statements on the performance of the program. ODS stated that OIG may have incorrectly characterized findings from previous program evaluations for the GEAR UP and Talent Search programs in describing results as generally positive, when, in fact, it would be more accurate to say that some correlational evidence in line with the desired outcomes of the programs was found.

ODS agreed, in general, with all of our recommendations, stating that it will ensure that program websites contain the most recent acceptable performance data and also develop performance measures related to high school graduation and college access/success rates for low-income and minority students, provided that they are consistent with statutory and regulatory requirements and determined by staff to be appropriate. However, it also described a number of limitations in its ability to conduct useful analyses of achievement gaps of students served by its high school discretionary grant programs. Among these are its relative inability to collect data for the peers of such students, as noted above, and statutory provisions that restrict rigorous impact evaluations of the TRIO programs, whereby other possible causes of changes in outcomes could be isolated to determine the effect of specific programs on student achievement. Despite these limitations, ODS stated that it recognizes the importance of continuing to work to obtain data that can be used to assess the effectiveness of its high school programs and identified activities that might be undertaken in support of this effort.

## **OIG Response**

We agree with ODS' suggested revision to the opening statement of Finding 2 and have made the applicable change. With regard to concerns raised over some of the statements regarding program performance, we note that our objective required that factors other than the attainment of performance goals or improvement on these measures be taken into consideration when describing programs that did or did not appear to be showing positive results. This included PART reviews and evaluations conducted by IES and OPEPD/PPSS, if available. With regard to specific concerns expressed over our ME-HEP characterization, while exceeding the target for one of its two effectiveness measures is encouraging, it did not show progress on efficiency

measures and, although older, its PART review noted there were no results demonstrated. When all noted performance data sources are considered collectively, we believe our conclusion is supported, as is also the case with our conclusion on the UB program. In addition, we do not believe that we mischaracterized the published evaluation results for the GEAR UP and Talent Search programs. For the purposes of this audit, evaluations citing measured improvements were given a generally positive characterization, regardless of whether the program was noted as being the primary cause or contributory cause for the positive results noted. Lastly, we requested the updated performance data for the specific program noted in ODS' comments but did not receive it for consideration by the time of issuance of our final report.

We recognize that, in some cases, there may be statutory and regulatory requirements or limitations that hinder the Department's ability to plan for and conduct useful analyses of the effectiveness of its high school discretionary grant programs in closing achievement gaps between low-income and minority students and their peers in high school graduation and college access/success. Nevertheless, we encourage the Department to continue to pursue any and all efforts that could assist it in determining whether achievement is improving for students served under these programs.

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## **OBJECTIVES, SCOPE, AND METHODOLOGY**

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The objectives of our audit were to (1) assess the extent to which the Department's high school programs are duplicative, and (2) determine if the Department has collected data that show whether these programs appear to be effective and efficient in reducing gaps between low-income and minority students and their peers in high school graduation and college access/success.

To achieve the audit objectives, we:

- Reviewed information on all of the Department's grant programs to identify those with a primarily high school-related focus;
- Reviewed legislation and regulations governing each of the selected programs, as well as background information available on the program websites;
- Conducted discussions with OPEPD and Budget Service officials to obtain a Department-wide overview and understanding of such programs;
- Interviewed program officials responsible for administering selected high school programs in OESE, OII, OPE, OSDFS, and OVAE;
- Obtained and reviewed program performance data, including annual performance plans, annual performance reports, PART assessments, and evaluations conducted by IES and OPEPD/PPSS;
- Interviewed IES and OPEPD/PPSS officials to gain a better understanding of relevant program evaluations and the Department's program evaluation process in general; and

- Reviewed prior OIG and GAO audit reports on overlapping or duplicative programs and also any reports pertaining to the programs under review.

The scope of our review was limited to Department grant programs that either serve high school students only (directly or indirectly), or include them as a primary target population as identified through a review of the Guide to U.S. Department of Education Programs (FY 2009) and corroborated by Department program officials. As noted in Finding 1, we identified a total of 18 Department grant programs that either serve high school students only (directly or indirectly), or include them as a primary target population. We subsequently grouped them into two main categories: (1) those with a focus on one subject area or on a specific subpopulation of students; and (2) those with a broad focus on encouraging high school graduation and/or promoting college access/success, primarily (but not solely) among low-income and minority students. We identified nine programs that fall under the first category and nine programs that fall under the second category. We determined the nine programs included under the first category have more narrowly-focused goals, objectives, and performance measures, and/or are targeted toward certain, often hard to reach, subpopulations, and despite sharing some similarities, offer fundamentally different services to unique populations. As a result, there appeared to be little potential for substantial overlap or duplication with the other high school programs. We subsequently focused our work on assessing the extent to which this occurs between programs included under the second category.

We compared the programs selected for review for similarities between: (1) program goals, objectives, and performance measures; (2) target population; (3) services provided; and (4) the manner in which services are provided. We established that to be duplicative, a program would have to match another program in all four areas, while to be overlapping, programs need only exhibit similarities in one or more areas.

We relied, in part, on computer-processed data from the Department's Grant Award Database to determine the extent to which recent OESE and OPE grantees have received or are currently receiving funds under multiple, potentially overlapping high school programs. As this information was used primarily for informational purposes and did not materially affect the findings and resulting conclusions noted in this report, we did not assess its reliability.

We conducted fieldwork at Department offices in Washington, D.C., during the period November 2010 through June 2011. We provided our audit results to Department officials during an exit conference held on June 9, 2011.

We conducted this performance audit in accordance with generally accepted government auditing standards appropriate to the scope of the review. Those 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 the audit objectives.

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## ADMINISTRATIVE MATTERS

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Corrective actions proposed (resolution phase) and implemented (closure phase) by your office will be monitored and tracked through the Department's Audit Accountability and Resolution Tracking System (AARTS). Department policy requires that you develop a final corrective action plan (CAP) for our review in the automated system within 30 days of the issuance of this report. The CAP should set forth the specific action items, and targeted completion dates, necessary to implement final corrective actions on the findings and recommendations contained in this final audit report.

In accordance with the Inspector General Act of 1978, as amended, the Office of Inspector General is required to report to Congress twice a year on the audits that remain unresolved after 6 months from the date of issuance.

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

We appreciate the cooperation given us during this review. If you have any questions, please call Michele Weaver-Dugan at (202) 245-6941.

Sincerely,

Keith West /s/  
Assistant Inspector General for Audit

**Attachment 1**

<b>High School Programs</b>				
<b>Program Name</b>	<b>PO</b>	<b>Program Office</b>	<b>FY 2010 Funding</b>	<b>FY 2011 Funding</b>
APIP	OESE	AITQ	\$27,225,355	\$19,909,339
APTF	OESE	AITQ	\$17,969,460	\$23,343,981
HSGI*	OESE	AITQ	\$50,000,000	\$48,902,000
ME-HEP	OESE	OME	\$19,948,431	\$19,709,450
N-D	OESE	SASA	\$50,427,000	\$50,326,146
SIG*	OESE	SASA	\$545,633,000	\$534,561,734
SLC	OESE	AITQ	\$80,107,636	\$0
Striving Readers*	OESE	AITQ	\$250,000,000	\$0
AAHC	OII	TQP	\$1,815,000	\$0
Close Up	OII	IP	\$1,942,000	\$0
CACG*	OPE	HEP/State Service	\$150,000,000	\$150,000,000
GEAR UP	OPE	HEP/Student Service	\$323,212,000	\$302,816,154
Talent Search	OPE	HEP/Student Service (TRIO)	\$141,954,000	\$138,659,000
UB	OPE	HEP/Student Service (TRIO)	\$257,831,000	\$305,840,000
UBMS	OPE	HEP/Student Service (TRIO)	\$35,230,000	\$33,812,000
GRAA	OSDFS	DVP National Programs	\$32,712,000	\$6,907,158
CTE	OVAE	DATE	\$1,143,497,334	\$1,123,659,178
Tech Prep	OVAE	DATE	\$102,923,000	\$0
<p><b>Program Office:</b> Academic Improvement and Teacher Quality Programs (AITQ), Office of Migrant Education (OME), Student Achievement and School Accountability Programs (SASA), Teacher Quality Programs (TQP), Improvement Programs (IP), Higher Education Programs (HEP) Trio Programs (TRIO), Drug-Violence Prevention, National Programs (DVP), Division of Academic and Technical Education (DATE).</p> <p>* Denotes relatively new programs or established programs operating under newly revised rules.</p>				

**Attachment 2**

<b>Proposed Eliminations and/or Consolidations</b>					
<b>Program Name</b>	<b>Elimination</b>	<b>FYs</b>	<b>Consolidation</b>	<b>FYs</b>	<b>New Authority~</b>
APIP			✓	2011-2012	College Pathways and Accelerated Learning
APTF			✓	2011-2012	College Pathways and Accelerated Learning
HSGI*	✓	2004-2005	✓	2011-2012	College Pathways and Accelerated Learning
ME-HEP					
N-D					
SIG					
SLC	✓	2004-2009	✓	2011-2012	Expanding Educational Options-Promoting Public School Choice Grants
Striving Readers			✓	2011-2012	Effective Teaching and Learning: Literacy
AAHC	✓	2007-2010	✓	2011-2012	Effective Teaching and Learning for a Well-Rounded Education
Close Up	✓	2004-2010	✓	2011-2012	Effective Teaching and Learning for a Well-Rounded Education
CACG	✓	2010			
GEAR UP	✓	2006-2007			
Talent Search	✓	2006-2007			
UB	✓	2006-2007			
UBMS					
GRAA	✓	2004-2009	✓	2011-2012	Successful, Safe, and Healthy Students
CTE	✓	2006-2007	✓	2012	CTE
Tech Prep	✓	2004-2009	✓	2012	CTE
	<b>11</b>		<b>10</b>		
<p>* The previous administration proposed eliminating this program when it was known as the School Dropout Prevention Program.            ~ The “New Authority” column identifies consolidated funding streams, proposed by the current administration, under which the programs would operate. In general, overall funding would remain the same, but there would be fewer programs to administer.</p>					

Summary Table									
Program Name	Objective One: Overlap and Duplication		Objective Two: Efficiency and Effectiveness					Proposed for Elimination (2004-2012)	Proposed for Consolidation (2004-2012)
	Specific Subject Area or Subpopulation	High School Graduation and/or College Access/Success	Annual Performance Plan/Report	Low-Income and/or Minority Student Performance Measures	PART Assessment (2002-2008)	IES Evaluation(s)	OPEPD/PPSS Evaluation(s)		
APIP	✓		✓	✓	✓				✓
APTF	✓		✓	✓	✓				✓
HSGI		✓						✓	✓
ME-HEP	✓		✓	✓	✓				
N-D	✓		✓	✓	✓				
SIG		✓							
SLC		✓	✓		✓		✓	✓	✓
Striving Readers	✓		✓			✓			✓
AAHC	✓		✓					✓	✓
Close Up	✓		✓					✓	✓
CACG <sup>^</sup>		✓						✓	
GEAR UP <sup>^*</sup>		✓	✓	✓	✓		✓	✓	
Talent Search <sup>^*</sup>		✓	✓	✓	✓		✓	✓	
UB <sup>^*</sup>		✓	✓	✓	✓		✓	✓	
UBMS*	✓		✓	✓			✓		
GRAA	✓		✓					✓	✓
CTE <sup>^</sup>		✓	✓		✓		✓	✓	✓
Tech Prep <sup>^</sup>		✓	✓		✓		✓	✓	✓
<b>18</b>	<b>9</b>	<b>9</b>	<b>15</b>	<b>8</b>	<b>10</b>	<b>1</b>	<b>7</b>	<b>11</b>	<b>10</b>

<sup>^</sup> Denotes programs that were identified as overlapping (color-coded).  
<sup>\*</sup> Denotes programs for which we located more than one OPEPD/PPSS evaluation.



**Acronyms/Abbreviations/Short Forms Used in this Report**

AAHC	Academies for American History and Civics
AITQ	Academic Improvement and Teacher Quality Group
APIP	Advanced Placement Incentive Program
APTF	Advanced Placement Test Fee Program
CACG	College Access Challenge Grant Program
CTE	Career and Technical Education
DATE	Division of Academic and Technical Education
Department	U.S. Department of Education
DVP	Drug-Violence Prevention, National Programs
ESEA	Elementary and Secondary Education Act
FY	Fiscal Year
GAO	Government Accountability Office
GEAR UP	Gaining Early Awareness and Readiness for Undergraduate Programs
GRAA	Grants to Reduce Alcohol Abuse
HEA	Higher Education Act
HEP	Higher Education Programs
HSGI	High School Graduation Initiative
IES	Institute of Education Sciences
IP	Improvement Programs
ME-HEP	Migrant Education – High School Equivalency Program
N-D	Prevention and Intervention Programs for Children and Youths Who Are Neglected, Delinquent, or At Risk
OESE	Office of Elementary and Secondary Education

OIG	Office of Inspector General
OII	Office of Innovation and Improvement
OMB	Office of Management and Budget
OPE	Office of Postsecondary Education
OPEPD	Office of Planning, Evaluation, and Policy Development
OSDFS	Office of Safe and Drug-Free Schools
OVAE	Office of Vocational and Adult Education
PART	Program Assessment Rating Tool
PO	Principal Office
PPSS	Program and Policy Studies Service
SASA	Student Achievement and School Accountability Programs
SIG	School Improvement Grants
SLC	Smaller Learning Communities
SSWG	Secondary Schools Working Group
TRIO	TRIO Programs
TQP	Teacher Quality Programs
UB	Upward Bound
UBMS	Upward Bound Math-Science



UNITED STATES DEPARTMENT OF EDUCATION

THE DEPUTY SECRETARY

October 26, 2011

## MEMORANDUM

TO: Michele Weaver-Dugan  
Director, Operations Internal Audit Team  
Office of Inspector General

FROM: Anthony W. Miller *awmiller*

SUBJECT: Draft Audit Report, Potential Overlapping High School Programs (ED-OIG/A19K0013)

Thank you for the opportunity to comment on the draft audit report, "Potential Overlapping High School Programs." As you know, the Secretary and I strongly believe that, in order to help the Nation reach President Obama's goal of out-educating the rest of the world, we must become more efficient and productive as an agency. Reducing and eliminating duplication in our programs, including those that serve high school students, is a key step toward this end. We are thus encouraged that the Office of Inspector General (OIG) found no instances of program duplication in its review.

The Department's responses to the findings and recommendations of the draft report follow.

**FINDING NO. 1 – Overlap Exists Among Some Department High School Programs**

On pages 8-9 of the report, OIG discusses the potentially negative effects of overlap on program administration and oversight. We appreciate OIG's insight in this area and will continue to examine whether our support for high schools is configured to have the most positive effects for students. However, we wish to note that we do not believe that program overlap (as opposed to program duplication) is inherently undesirable, nor that an instance of overlap should necessarily cause the Department to seek elimination or consolidation of the affected programs. In fact, overlapping programs can provide valuable complementary services to local educational agencies, schools, or students. In such cases, we believe that the most appropriate action may be to seek to coordinate administration of the programs so that delivery of services is as efficient and effective as possible.

We believe that the clarity and accuracy of the report would be improved by providing further information or explanation in certain other areas. For instance, on page 6 of the draft report, OIG discusses potential overlap among the College Access Challenge Grants, GEAR UP, Talent Search (TS), and Upward Bound (UB) programs, with a focus on overlap between the TS and UB programs, including overlap in services provided. We believe that the report would benefit

from a more detailed discussion of the differences in intensity of service between the two programs. UB is an intensive academic program designed to generate in program participants the skills and motivation needed to complete high school and enter and succeed in postsecondary education. While designed to encourage participants to complete high school and undertake a program of postsecondary education, TS provides, in comparison, limited academic support; instead, TS provides academic and career counseling and also assists students with the postsecondary education application process, including applying for financial aid. We believe this additional detail would help ensure the reader has a proper understanding of the nature and extent of potential service overlap between the programs.

On page 8, OIG discusses the Secondary School Working Group. We would like to note that the Secondary School Working Group has a high level of participation, with representatives from a majority of Department offices (including all offices with high school programs) attending meetings on a regular basis and an average of 20 participants at each meeting.

On page 8, OIG also discusses the reorganization of the Office of Postsecondary Education (OPE). This discussion should be updated to reflect the fact that the reorganization is now complete, with administration of the GEAR UP and TS programs occurring in the same division, allowing staff who have been assigned grants under the programs to collaborate more directly to achieve program goals and objectives.

On Page 9, OIG notes with respect to the TS and UB programs that there are no statutory or regulatory prohibitions on grantees receiving funds under both programs at the same time. In fact, the authorizing statute specifically permits an entity to receive multiple TRIO program grants and permits the director of a program receiving funds to administer one or more additional programs for disadvantaged students (e.g., GEAR UP) operated by the sponsoring institution or agency, regardless of the funding sources of such programs. These statutory provisions clearly have an impact on the Department's ability to prevent potential service overlap in the TS and UB programs. We recommend that OIG revise the text accordingly.

Lastly, we recommend that Attachment 1 include a column that provides fiscal year 2011 funding levels for the programs. This will help reinforce the finding that funding for certain programs covered by the report (Smaller Learning Communities, Striving Readers, Close Up, and Tech Prep) was eliminated and thus that there is currently less potential for program overlap than in previous years.

## **Recommendations**

### **We recommend that the Deputy Secretary:**

- 1.1 Continue to actively promote coordination among similar programs, ensure that key staff are aware of such efforts and encouraged to participate, refocus some of the Department's current efforts to better reflect coordination efforts, emphasize coordination as relating to administrative and operational matters, and consider formalizing other notable informal coordination efforts.**

We agree with Recommendation 1.1 and, in order to improve administrative efficiency and overall program impact, will continue to promote coordination among similar high school programs through the Secondary School Working Group and other means.

We note, as another example of our coordination efforts, that the Office of Vocational and Adult Education, in partnership with the Office of Planning, Evaluation, and Policy Development, established in summer 2010 a Career and Technical Education (CTE) Strategy Workgroup consisting of representatives of numerous offices throughout the Department. The CTE Strategy Workgroup collaboratively developed a CTE Transformation Strategy that is being used to help guide the Department's proposal to reauthorize the Carl D. Perkins Career and Technical Education Act. We recommend that these efforts be recognized in the report.

**1.2 Continue to work with Congress to consolidate or eliminate programs that overlap with one another, with an emphasis on those that do not appear to be achieving intended results.**

We agree with Recommendation 1.2. As the draft report notes, the Department has in past years recommended for consolidation or elimination a number of Federal education programs. Through our annual budget development process and other means, we will continue to work to identify for consolidation or elimination programs that are duplicative or not achieving intended results or that otherwise do not warrant funding.

We note that the Administration's proposal to reauthorize the Elementary and Secondary Education Act (ESEA) would create a new high school program, College Pathways and Accelerated Learning. This program would replace, with a more comprehensive and flexible authority, several, sometimes narrowly targeted, ESEA programs that offer accelerated learning opportunities or seek to prevent students from dropping out of school, including the Advanced Placement programs and the High School Graduation Initiative.

**1.3 Develop and implement policies and procedures related to Department grantee application review and monitoring efforts that would help ensure that local education agencies, schools and/or students are not being over-served by similar programs and services.**

We agree with Recommendation 1.3 but do not believe that action by the Department with respect to the TS and UB programs is needed. Department regulations require that recipients of TS and UB grants collaborate with other Federal TRIO projects, GEAR UP projects, or programs serving similar populations that are serving the same target schools or target area in order to minimize the duplication of services and promote collaborations so that more students can be served (34 CFR 643.11(b); 645.21(a)(4)). In addition, staff for these programs currently track, as part of budget reviews, whether entities are receiving multiple related grants. In light of these regulatory requirements and review procedures, and because this recommendation appears to be intended to address potential

service overlap in the TS and UB programs specifically, we do not believe that further action with respect to the recommendation is warranted.

Although we agree in principle with the idea that students should not be over-served by Federal education programs, we note that the report did not identify instances of such over-service, and we are not aware of any situations in which this is occurring. Thus, OIG may wish to delete “and/or students” from the recommendation.

**FINDING NO. 2 – Performance Measures and Available Data on the Reduction of Gaps Between Low-Income and Minority Students and Their Peers Are Lacking**

The draft report’s statement, “We found that the Department has not collected data on any of the 18 programs included in our review, nor has it established related performance measures, specifically related to the programs’ effectiveness in reducing gaps between low-income and minority students and their peers in high school graduation and college access/success,” can be interpreted in different ways and is potentially misleading to the reader. For clarity, we recommend that it be revised as follows: “We found that, although the Department has collected extensive performance data on the programs under review, it has not collected data or established performance measures specifically on effectiveness in reducing gaps between low-income and minority students and their peers in high school graduation and college access/success.” In addition, we note that our ability to collect, for comparison purposes, data on the peers of the low-income and minority students served by our high school discretionary grant programs is generally limited by funding and other constraints, rendering performance measures that examine local gaps in achievement or attainment generally not feasible to implement.

We believe that the report’s statement to the effect that the Migrant Education-High School Equivalency Program (ME-HEP) may not be producing positive results regarding high school graduation rates or college access/success is not accurate. As the draft report notes, ME-HEP exceeded the target for one of its two effectiveness measures (Measure 1.1: The percentage of ME-HEP participants receiving a General Educational Development (GED) certificate) in 2010 and also made progress from the previous year on both measures. We believe that such performance reflects positive results and recommend that general conclusions regarding ME-HEP performance be revised accordingly.

We believe that the report would benefit from additional discussion of the limitations of using PART reviews, which were conducted only through 2007, to assess current program performance – particularly for programs for which, according to OIG, PART results suggest deficiencies in ability to achieve short- and long-term performance goals. For one of these programs, ME-HEP, current annual performance data show, as OIG notes, improvement with respect to performance measures. In another case, UB, OIG notes that the program has currently met or exceeded all of its performance measure targets. We believe that these results cast doubt on claims of deficiency in these programs made on the basis of older information from PART reviews.

We would also like to correct OIG’s characterization, on page 14 and in Table 4 on page 12, of the findings from previous program evaluations. Of the four high school programs studied

through previous evaluations, only the Upward Bound Math and Science program was found to have a generally positive effect. The evaluations of the GEAR UP and TS programs found some correlational evidence in line with the desired outcomes of the programs. In addition, for the evaluation activities currently under way related to GEAR UP and UB, we believe it is more accurate to say that the Department is completing its analysis of the data collected through these activities to determine if they provide information that would be useful for program improvement.

Lastly, we wish to note that more recent data (for 2010 instead of 2009) are available for the Neglected or Delinquent program. These data impact OIG's statements on the performance of this program. We would be happy to provide the data if requested.

## **Recommendations**

### **We recommend that the Deputy Secretary:**

#### **2.1 Establish performance measures related to low-income and minority student performance with regard to high school graduation and college access/success rates in applicable programs.**

We agree with Recommendation 2.1 and will initiate, by December 1, 2011, development of such performance measures where they are consistent with statutory and regulatory requirements and determined by staff to be appropriate for an affected program.

#### **2.2 Use the data collected from the performance measures above to analyze the effect that these programs are having on closing achievement gaps.**

We agree with Recommendation 2.2 to the extent it is practicable. As discussed above, our ability to collect achievement data for the peers of the low-income and minority students served by our high school discretionary grant programs is generally limited. As a result, we do not believe that we can conduct useful analyses of achievement gaps of students served by these programs. However, we will consider the feasibility of using achievement data collected under the programs to assess the extent to which these programs are serving their target populations.

Furthermore, the Department cannot determine the effect of programs on student achievement or other important outcomes without isolating the other possible causes of changes in outcomes. This is not possible using data from performance measures alone. Unfortunately, statutory provisions in the Higher Education Act restrict the Department's ability to conduct rigorous impact evaluations of the TRIO programs, which further limits our ability to determine the effectiveness of these programs in narrowing achievement gaps and accomplishing their other statutory purposes.

These limitations notwithstanding, we recognize that we must continue to work to obtain data that can be used to assess the effectiveness of our high school programs. As an example of such work, we note that we already use performance measures in formula

grant programs, including Title I Grants to LEAs and Individuals with Disabilities Education Act Grants to States, to examine achievement gap closings and will explore the feasibility of using data from such measures to determine whether achievement is improving for students served under our high school programs.

Lastly, we acknowledge that the Department must continue to work to conduct rigorous program evaluations in a cost-effective manner. We believe that our support for the development and expansion of State longitudinal data systems will help significantly in this effort.

**2.3 Ensure that related performance data are available and are as current as possible to enable analysis on whether programs are achieving their intended outcomes as effectively as possible and at the lowest possible cost and to inform future proposals on program eliminations and consolidations.**

We agree with Recommendation 2.3 as it pertains to making current performance data publicly available and will ensure that the Web sites of affected programs contain the most recent acceptable performance data by December 1, 2011.

Thank you for conducting this audit. OIG's work in this area will provide a valuable contribution to the Department's ongoing efforts to help improve achievement and attainment in our Nation's high schools.

Attached to this memorandum are recommended technical edits to the draft report.