



FLORIDA DEPARTMENT OF EDUCATION



Office of Inspector General

April 2010

Report No. 09/10-01A

Audit of Florida Assessments for Instruction in Reading Grant

Overview

The Florida Assessments for Instruction in Reading (FAIR) Grant was administered in the state's 67 school districts during the current school year. We identified noteworthy accomplishments that should be continued and also identified areas to consider for improvement and made recommendations to Department management for strengthening assessment practices.

We recommend that Department of Education (Department) management:

- Develop a monitoring plan and formalize monitoring activity by developing written procedures that address specific program areas.
- Address classroom management considerations for testing K-2 students.
- Continue to work with The Florida Center for Reading Research in evaluating the appropriateness of the content material provided in the assessments.
- Continue to provide training to reading coaches and teachers on how to analyze the assessment data.
- Consider standardizing the administration of the assessments if the data is to be used by the Department for accountability measures and evaluate the utility of the assessment data for accountability measures.
- Analyze the cost/benefits of testing students with Florida Comprehensive Assessment Test (FCAT) scores of four and five. In addition, consider using the assessment as a teacher support tool for developing instruction based on student

reading needs and testing students with the greatest needs on a regular basis.

Background

Florida has received approximately \$300 million over the past six years in federal Reading First funds to help reach the goal of every child reading at or above grade level by 2012. As part of this initiative, the Department of Education has worked in collaboration with the Florida Center for Reading Research (FCRR) and has developed the FAIR grant.

The FCRR was established in January 2002, and is jointly administered at Florida State University by the Learning Systems Institute and the College of Arts and Sciences. Part of FCRR's mission is to provide technical assistance to Florida's schools and to the Department for the improvement of literacy outcomes in students through 12th grade.

The FAIR grant is discretionary and non-competitive, with funding of \$2.2 million for fiscal year 2009-2010. The FAIR assessment was administered in 21 schools in four school districts as a pilot program during the 2008-2009 school year. The assessment was administered to 1.64 million students in all 67 school districts in 2009-2010. FAIR is research based and focuses on grades K-12. The assessment is administered at the discretion of each school district. According to Title I part B, section 1201, states were awarded Reading First funds to provide assistance to state and local education agencies in establishing reading programs. The reading programs were developed to ensure that every student is capable of reading at or above grade level no later than the end of third grade.

The FAIR assessment system provides teachers with screening, diagnostic and progress monitoring information that is useful to guiding instruction. The diagnostic component of the assessment was developed to provide a tool to support teachers with developing instruction based on student reading needs, with the main focus of testing lower level students that are academically behind their classmates in the classroom. Grades K–2 students are assessed individually by their teachers while grades 3–12 students are tested on the computer. The assessment is administered three times a year, which is consistent with progress monitoring guidelines. FAIR also provides ongoing progress monitoring which is provided between assessment windows for students with serious reading difficulties to ensure that the instruction prescribed is working and, if not, adjust instruction accordingly. Furthermore, the assessment data provides screening at each assessment window that determines the student probability of reading success by the end of the year.

Noteworthy Accomplishments

A number of noteworthy accomplishments were identified during our audit, including:

- 1) FCRR and DOE staff and management have been very responsive to issues brought to their attention according to district and public school staff.
- 2) Elementary schools where the majority of students score below a level four or five on the FCAT have observed positive outcomes from FAIR.
- 3) Teachers find the “tool kits” provided in conjunction with FAIR to be very useful in the classroom.
- 4) Teachers and administration have found the immediate feedback from FAIR on the students’ strengths and weaknesses to be a useful guide for instruction.
- 5) School administrators and teachers believe that FAIR can be used to prescribe instruction based on student needs, and also provides accountability.

In order to further improve the usefulness of FAIR, the OIG offers the following findings and

recommendations for management’s consideration.

Findings and Recommendations for Improvement

1. A monitoring plan with formalized monitoring activity and written procedures addressing the review of specific programmatic areas has not been developed.

The U.S. Department of Education requires the Department to monitor grant funds that have been awarded to sub-recipients. The method of monitoring the funds should be risk-based, formalized and based on a combination of desk reviews, on-site visits, and other mechanisms for reviewing grant awards.

Monitoring has been restricted in recent years by limited legislative appropriations and lack of approval for new positions. The Just Read, Florida! Office is responsible for the development and oversight of the FAIR assessment grant awarded to FCRR. Office representatives meet bi-weekly with FCRR to discuss issues and progress and review quarterly reports made by FCRR. Currently, only six employees are available for monitoring grants which precludes extensive monitoring in the school districts.

For the Department to better comply with the federal monitoring requirements, and to help ensure accountability by grant recipients, **we recommend** that the Just Read, Florida Office:

- Develop a monitoring system,
- Formalize the monitoring activity by developing written procedures, and
- Collaborate with other Division of Public Schools (Division) units to coordinate appropriate monitoring resources.

2. Teachers expressed concern about classroom management when assessing K-2 students.

OIG staff observed three elementary schools during assessment period two (December 2009/January 2010) in Leon County. Two of the

schools were also included in the pilot 2008–2009 school year, and one of the schools was a randomly selected non-pilot school. While visiting the three schools, the auditors were able to observe teachers administering the assessment. For grades K–2, the teachers were responsible for testing their students individually. The overall consensus from the teachers was that they preferred testing their own students, but were having difficulty with classroom management when assessing students individually. To confirm this observation, OIG staff also interviewed teachers and reading coaches in Taylor County and interviewed administrators in Alachua, Broward, and Hillsborough Counties.

We recommend that the Just Read, Florida! Office encourage school districts to provide teacher aides or some other form of support in the classroom for grades K–2 during the three assessment periods. This would allow teachers to focus on testing the students individually while receiving assistance with the management and teaching of the other students in the class. This would reduce distractions for the teacher and improve the classroom quality for the students not assessed.

3. Teachers expressed concern about the appropriateness of content (passages) in the assessments.

FCRR informed us that FCAT guidelines are followed regarding the appropriateness of the content material provided in the assessments. While the content may be appropriate, teachers we spoke with said that the students were not able to relate to the stories and as a result often felt discouraged and gave up prior to completing the test. There will be students that experience difficulty relating to passages for multiple reasons. High functioning students may not be able to relate to some of the FAIR passages, as the test is adaptive. If, for example, a third grade student is reading at a tenth grade level, they may not be able to relate to the content of the passage provided to them because it covers tenth grade history. This is difficult to avoid with an adaptive assessment.

Although the structure of an adaptive assessment presents challenges, **we recommend** that the Division continue to work

with FCRR in evaluating the appropriateness of the content material provided in the assessments to keep students engaged. This may include interviewing teachers who administer the assessment.

4. Additional training is needed for reading coaches and teachers on how to analyze the assessment data.

While conducting site visits in Leon County, OIG staff were able to review the assessment data from periods one and two. We observed that teachers and reading coaches did not understand how to analyze some of the assessment data. Even though FCRR and Just Read, Florida! staff have been able to meet with districts and schools upon request, there is continued confusion on interpretation of assessment results. We also found the same condition in other school districts. For example, there were instances where a student's outcome measure was within the green success zone (85% or better chance of scoring at or above grade level by the end of the year), but that result was not truly reflective of students' reading comprehension ability according to the teacher.

It was suggested to us that teachers may be teaching the students the words for the assessment prior to the test. This reduces the validity of the assessment as a true indicator of the abilities of the student. FCRR expressed concern that assessment interpretation training provided by different programs within the Department was inconsistent.

We recommend that the Just Read, Florida! Office, the Bureau of School Improvement, FCRR, and the school districts collaborate to train reading coaches and teachers to properly interpret the data and thus be better informed of student instruction needs.

5. Administration of the assessments has not been standardized which impacts its use for accountability purposes.

OIG staff observed that the schools did not have standardized procedures for administering the assessment. We reviewed procedures for administering the exam in different districts, as well as directly observed the administering of the assessment in three schools in Leon County and found that there was not a consistent statewide

policy. The Department allowed the districts to determine which students were to be assessed as well as the format for administering the assessment.

For example:

- Some school districts tested only those students with Florida Comprehensive Assessment Test (FCAT) scores of three and below, while other districts tested all students regardless of their previous FCAT score. (We were informed that students who had achieved FCAT scores of four and five often did not take the exam seriously and rushed through the exam to finish.)
- Certain districts required only K–5 students to be tested while other districts required schools to test K–12 students.
- Some schools allowed students to work in the computer lab as long as needed to finish the assessment, while other schools divided the test into 30 minute timed segments. In schools where students were required to take the test in three segments, students at times were rushed to finish the assessment.

As a result of these practices, the data may not accurately reflect the students' abilities and test results may not be comparable among districts.

During our field work in Leon County and telephone interviews with school and district office staff in other counties, several questions arose regarding differentiated accountability. For example, the schools which are responsible for providing benchmark data for differentiated accountability were uncertain as to what data to provide to the Division and whether the data was accurate for differentiated accountability purposes. There were several instances where reading coaches and teachers questioned the outcome results for students who did not have previous FCAT scores. One of the FAIR assessment scores for grades 3–12 is based on a student's FCAT score and their answers to the questions on the reading comprehension task on FAIR. When a student does not have a previous FCAT score the student is assigned the mean score from that school. As a result, if a lower level student attends a high performing school where the mean for the FCAT is above a three,

that score may not be indicative of the student's ability, and may contradict other scores.

We recommend that the Division develop written policies and procedures for the standardization of the assessment and provide these policies to the school districts. The written guidance should address the issues identified above.

We also recommend that, if the Department continues to rely on FAIR assessment data as an accountability measure, the Bureau of School Improvement collaborate with the Just Read, Florida! Office and FCRR to define benchmarks for FAIR assessments. The Department also should consult with FCRR to determine whether the student data is accurate and reliable based on the defined benchmarks.

6. Some educators we interviewed questioned the cost/benefit of testing students with FCAT scores of four and five.

Based on meetings with school districts and FCRR and our observations, we believe there is confusion regarding the purpose of the FAIR assessment. FCRR informed us that the FAIR assessment was developed for use as a tool to support teachers with information about student reading needs, and not as an accountability measure. The tool was designed to test lower level achieving students to identify areas of weakness in reading comprehension. FCRR also mentioned that the state tests students a minimum of three times a year for progress monitoring purposes. In our opinion, if the Department considers using the assessment as a tool for supporting teachers rather than relying on the data for accountability measures, the Department should focus on lower performing students rather than testing the high-achieving students.

School administrators and teachers believe that the cost in lost classroom time of assessing students with FCAT scores of four and five outweighed the benefits of administering the assessment. Teachers found the data for these high achieving students to be not informative as their abilities were known.

While the Department allowed the school districts and the schools to decide whether to

test students with FCAT scores of four and five, many teachers found it to be time consuming and reduced the student's classroom time. **We recommend** that the Department provide guidelines to the school districts addressing appropriate assessment levels at each school grade. Based on assessment results from period one, students that meet these successful assessment levels should be considered for exemption from the following assessment periods. Students with FCAT scores of one to three should be assessed on a regular basis.

Scope and Objectives

The original scope of the audit included a review of grant monitoring, deliverables, and expenditures for fiscal year 2008–2009. However, we modified our approach upon learning that FCRR's fiscal controls had recently been audited by Florida State University's internal audit function and the Auditor General. We changed our scope to focus on the FAIR assessment program rather than on fiscal controls. We also changed the audit objectives to focus on obtaining feedback from selected school districts regarding the FAIR assessment, evaluating the sufficiency and effectiveness of controls in place for administering the assessment, evaluating the reliability of the assessment data provided to the Department, and reviewing the cost/benefits of the FAIR assessments. The scope of the audit included analysis of pilot school districts from the 2008–2009 school year, direct observation of the administration of the assessment to K-5 students in Leon County, and interviewing administrators and teachers in Taylor, Broward, Alachua, and Hillsborough County schools.

Methodology

This audit was conducted in accordance with *The International Standards for the Professional Practice of Internal Auditing*, published by the Institute of Internal Auditors. The audit team achieved these audit standards by:

- Conducting interviews with three of the four school district pilot programs (Leon, Alachua, and Broward County) and two other districts (Hillsborough and Taylor County);

- Conducting on-site visits to three elementary schools in Leon County and interviewing teachers at two schools in Taylor County;
- Researching and reviewing applicable statutes, rules, manuals, and procedures;
- Examining Florida State University's policies and procedures for the administering of grants, p-cards and gift cards;
- Interviewing Drummond Press, the printing service provider for the teaching tool kits, and examining FCRR's and the Department's policies and procedures for requesting of printing and invoicing for services rendered;
- Reviewing assessment data and the reliability of the information; and
- Observing K–5 students during assessment period one and two.

The selection of school districts was not statistically based. OIG staff selected three pilot school districts from the 2008 – 2009 school year and two other non-pilot districts for the 2009 – 2010 school year.

Closing Comments

The Office of the Inspector General would like to recognize and acknowledge Department and FCRR management and staff for their assistance during the course of this audit. Our fieldwork was facilitated by the cooperation and assistance provided by all personnel involved. We were impressed with the professionalism and dedication of both organizations.

FLORIDA DEPARTMENT OF EDUCATION



STATE BOARD OF EDUCATION

T. WILLARD FAIR, *Chairman*

Members

DR. AKSHAY DESAI

MARK KAPLAN

ROBERTO MARTÍNEZ

JOHN R. PADGET

KATHLEEN SHANAHAN

SUSAN STORY

Dr. Eric J. Smith
Commissioner of Education



MEMORANDUM

TO: Ed Jordan, Inspector General

FROM: Dr. Frances Haithcock

DATE: April 9, 2010

SUBJECT: Audit of the Florida Assessments for Instruction in Reading Grant

This memorandum provides a response to your audit of the Florida Assessments for Instruction in Reading Grant and the recommendations contained in your report dated March 2010, Audit Number 09/10-01A.

I would like to thank you and the audit staff for working with Just Read, Florida! throughout the audit process. We hope that, as a result of your audit recommendations, the changes made in processes and procedures will result in highly effective and efficient delivery of the Florida Assessments for Instruction in Reading (FAIR). Following are the audit recommendations and the Department's responses:

1. Develop a monitoring plan and formalize monitoring activity by developing written procedures that address specific program areas.

The Department agrees that a monitoring plan for FAIR administration should be developed and carried out to regularly monitor and support administration of this assessment system statewide. To accomplish this, the Just Read, Florida! Office will collaborate with other Bureaus and Offices in the Division of Public Schools to develop a monitoring system and formalize the monitoring activity by developing written procedures.

DR. FRANCES HAITHCOCK

CHANCELLOR OF PUBLIC SCHOOLS

2. Address classroom management considerations for testing K-2 students.

The Department agrees that support for K-2 classroom teachers is needed during FAIR administration. The Just Read, Florida! Office will refine FAIR training and develop technical assistance to emphasize the importance of scheduling FAIR in a manner that protects instructional time. Examples of how schools can schedule FAIR administration to support teacher administration will be provided. The examples will include, but not limited to:

- providing extra personnel to support classroom instruction while the classroom teacher is administering FAIR
- considering the use of assessment teams to conduct FAIR and having the classroom teacher be one of the members of that team
- the consideration of dispersing students from one teacher's classroom into the other grade level teachers' classrooms to have a full day to administer FAIR

All of the recommendations provided through FAIR training and technical assistance will keep the preservation of quality instructional time at the forefront.

3. Continue to work with The Florida Center for Reading Research in evaluating the appropriateness of the content material provided in the assessments.

FAIR is an adaptive assessment, which allows teachers to determine a student's instructional level and begin instruction accordingly. Due to the adaptive nature of FAIR, it is difficult to avoid some of the text being difficult for students to understand or relate to because their placement into passages is based on their performance. For example, the high functioning third grade student may not be able to relate to some of the FAIR passages if they are reading at a 10th grade level since the text provided will be more complex due to the level and content of the passage. However, the Department agrees with the recommendation to continue to work with FCRR in evaluating the content to ensure appropriateness. One way of work that will be continued is the review of all passages developed for FAIR. Another way the Department will ensure that content is appropriate is through conducting a district and school survey to evaluate whether students are able to relate to the content material provided in the assessment and then adjust content of the passages based on the feedback provided.

4. Continue to provide training to reading coaches and teachers on how to analyze the assessment data.

The Department agrees with the recommendation to provide continued training on how to analyze FAIR data to inform instruction to meet student needs. Just Read, Florida! and FCRR have conducted training since January 2009, and have continued to provide training throughout the school year through face-to-face trainings, webinars, videos, and guidance and technical assistance documents. The following Web sites provide on-line resources for FAIR:

<http://www.fcrr.org/FAIR/index.shtm>

<http://www.justreadflorida.com/instreading.asp>
<http://www.justreadflorida.com/LEaRN/>

The Just Read, Florida! Office and the Bureau of School Improvement also collaborate and will create a plan for site-based training and support focused on analyzing FAIR data to inform instruction.

5. Consider standardizing the administration of the assessments if the data is to be used by the Department for accountability measures and evaluate the utility of the assessment data for accountability measures.

FAIR was developed to provide teachers with screening, progress monitoring, and diagnostic information that is essential in guiding instruction. It was not developed as an accountability measure. The Department agrees, however, that the Bureau of School Improvement, the Just Read, Florida! Office, and FCRR need to collaborate to determine the appropriate administration of FAIR.

6. Analyze the cost/benefits of testing students with Florida Comprehensive Assessment Test (FCAT) scores of Level 4 and 5. In addition, consider using the assessment as a teacher support tool for developing instruction based on student reading needs and testing students with the greatest needs on a regular basis.

The Department agrees that additional guidelines should be provided to districts on determining the appropriate students to assess with the FAIR K-2 and 3-12 applications. Based on assessment results from the first assessment window, districts and schools may choose to discontinue assessment of students that are above grade level proficiency unless they see a need to assess based on classroom based performance and progression throughout the school year. Any student identified with a reading difficulty or scoring Level 1-3 on FCAT should be assessed on a regular basis. To ensure FAIR is administered on a more frequent basis for students with reading difficulties, the Department will continue to work towards providing FAIR ongoing progress monitoring tools to ensure teachers have the necessary resources to determine if progress is being made and adjust instruction accordingly and in a timely fashion.

Thank you for your very constructive feedback through the audit process and for this opportunity to carefully examine FAIR practices and make needed adjustments. The end result can only be an improved FAIR that will be the seamless and effective tool that our teachers deserve.

FH/cm

CC: Barbara Elzie
Cari Miller