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

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A report by the District Performance Auditor  
February 2010

**PORTLAND PUBLIC SCHOOLS  
PORTLAND, OREGON**



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Richard C. Tracy  
District Performance Auditor

## Memorandum

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

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

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

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

cc:	Carole Smith Jollee Patterson
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# SUMMARY

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

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

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

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





# INTRODUCTION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Source: Auditor summary of NCLB Act provisions

## Supplemental Educational Services at Portland Public Schools

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

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

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

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

Source: PPS Title I-A financial analyst

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Audit objectives, scope, and methods

**T**his audit had four primary objectives as follows:

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

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

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

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

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



# AUDIT RESULTS

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

In addition, SES appears to have a relatively minor, and often insignificant, impact on improving student achievement in Math and Reading. While SES is designed to raise the achievement of disadvantaged students attending low-performing schools, various studies and evaluations show that SES at best has a very modest positive effect on participating students compared to similar students not receiving SES. Nevertheless, there is evidence that the effectiveness of after-school tutoring can be optimized by





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

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

As illustrated in Figure 9 on page 13, 92 of 435 (21%) SES students served in 2008-09 were identified as special education students. We found no evidence that SES eligible students with special needs or disabilities were unable to access SES services if

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

	<b>2005-06</b>	<b>2006-07</b>	<b>2007-08</b>	<b>2008-09</b>
20% of Title I-A for SES and Choice	\$2,960,309	\$3,159,104	\$3,149,922	\$3,924,375
Actual SES set-aside	\$740,077	\$1,003,680	\$787,500	\$1,000,000
Actual SES spending	\$526,6			

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

## SES provider compliance with PPS agreements

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

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

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

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

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

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

\* Student served differs from previous tables because it includes students not reported to OC.5(rv,oStudent se)5.5(E0

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

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

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



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

Student goal statements were submitted late and some were missing. Goal statements are an important tool for establishing tutoring service levels and



## Controls over SES provider payments

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

**Maximum annual payment per student.** In accordance with federal regulations and the contract agreement between PPS and SES providers, the maximum billable amount per student for tutoring services in 2008-09 was \$1,593. For all but one provider, monthly invoices for services includes a column for the year-to-date billing for each student based

## Effectiveness of SES tutoring in improving student achievement

Determining the effectiveness of SES in improving student achievement is a fundamental question that has been addressed by a number of studies and

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

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

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

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

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

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

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

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



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

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

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

Source: SES agreements and auditor review of goal statements

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

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

- € Not all students reported as successfully completing tutoring have completed both a pre and post assessment test
- € Methods for assessing the success of participants failing to complete sessions are subjective and potentially unreliable
- € Student achievement goals are not specific to individual students but are generalized goals for all participants
- € Differences in measurement tools make comparisons of the relative effectiveness of providers difficult to determine
- € Provider goals (targets) for increases in student achievement appear

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

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

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



# CONCLUSIONS AND RECOMMENDATIONS

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

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

1. Place SES information on the PPS w

1.



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



# MANAGEMENT RESPONSE





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OFFICE OF THE SUPERINTENDENT

Carole Smith  
Superintendent

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

Audit recommendations and management responses

Recommendation Place SES information on the PPS Website.

Response PPS closed its second enrollment window for SES on January 2012 and all public information related to SES will be posted as soon as data is verified. Past postings were delayed during an extended web page migration as the district implemented a new web platform for all departments.

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

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

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

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

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

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

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

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

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



Audit recommendations and management responses

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

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

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

Response We agree that an SES tutoring plan is most effective when constructed with the cooperation of teachers and SES tutors. This year we will conduct a pilot program at King PK-8 school intended to identify and implement effective ways for teachers and SES tutors to

Audit recommendations and management responses

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

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

Responses We agree that such changes will require renegotiation of current agreements with SES providers and waivers from some of the existing federal regulations governing the provision of SES. At this time, there is no structure for working with the ODE to identify and obtain waivers or to develop common assessment tools that could inform SES contract negotiations. In August 2019, several districts from around the state including Portland offered to create an SES workgroup to address these issues under ODE guidance; however, this workgroup has not yet been convened. PPS will contact ODE to find out if and how we might work with the ODE, other districts and SES providers toward those goals.

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

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

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

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

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

CONCLUSION

Thank you again for your informative and constructive report on SES services in PPS. The conclusions and recommendations in this audit will help guide us toward the best possible outcomes for our students.

# APPENDICES



# APPENDIX A

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

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

Provider Contact Information	Location of Services	Content/Target Population	Staff to Student Ratio	Schedule
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# APPENDIX B

## Bibliography



# APPENDIX C

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

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

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

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

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

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

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

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

NOTE: Differences between groups are NOT statistically significant.

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

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

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

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

