

**Columbus City Schools
Office of Internal Audit**



**COLUMBUS
CITY SCHOOLS**

**Third Grade Reading Guarantee (3GRG)
Audit Report**

Report Date: March 26, 2019

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Executive Summary

The Columbus City Schools (District) Office of Internal Audit (OIA) has recently completed a general audit of various sub-processes within the District’s Third Grade Reading Guarantee (3GRG) program. Our audit focused on evaluating predetermined objectives selected by OIA. This general audit consisted of the review and testing of these objectives relevant to the 3GRG program.

Based on the results of our work during this audit, we found areas where improvements could be made to strengthen the internal control environment and enhancements could be made to current processes to increase the efficiency of the 3GRG program.

During the course of our audit, we made various building staff, various building administration, and senior management involved in the 3GRG program aware of our issues, comments and recommendations for improvement. Good discussion took place regarding the recommendations. OIA appreciates the cooperation extended to us and the assistance of all staff we came into contact with as we performed our audit.

The following are OIA issues noted during the review:

<p>Risk Ratings, defined:</p> <p>1 – High/unacceptable risk requiring immediate corrective action;</p> <p>2 – Moderate/undesirable risk requiring future corrective action;</p> <p>3 – Low/minor risk that management should assess for potential corrective action.</p>
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Issues	Risk Rating		
	1	2	3
<p>Objective 1: To determine written business objectives/goals, metrics and risk analysis exist for the Departments involved in the 3GRG program.</p>			
<p>Issue No. 1 – Various Departments involved in the 3GRG process do not have written business objectives, metrics or risk analysis to guide the 3GRG program, determine successes, avoid pitfalls, and enhance its efficiency and effectiveness.</p>	X		

Issues	Risk Rating		
	1	2	3
Objective 2: To determine appropriate governance exists and is communicated appropriately.	No comments		
Objective 3: To determine sufficient internal controls are in place and operating as management intends.			
Issue No. 2 – Parental/guardian notification (Not on Track) letters sent by the District are sent late and/or are missing required statutory elements.		X	
Issue No. 3 – Supporting documentation relating to the Reading Improvement and Monitoring Plan (RIMP) is insufficient for the required elements.	X		
Objective 4: To determine appropriate monitoring function is in place to enhance accountability and identify problem areas in a timely manner.			
Issue No. 4 – The 3GRG program does not have sufficient monitoring for the 3GRG program.		X	

Audit Objectives

The objectives of the audit were to determine:

- Written business objectives/goals, metrics and risk analysis exist for the 3GRG program;
- To determine appropriate governance exists and is communicated appropriately;
- To determine sufficient internal controls are in place and operating as management intends; and
- To determine appropriate monitoring function is in place to enhance accountability and identify problem areas in a timely manner.

Sub-processes reviewed during this audit were:

- Reading Diagnostic Test Administration;
- Reading Improvement and Monitoring Plan (RIMP);
- Notification letter to parent or guardian of child not on track (reading below grade level);

- Alignment of RIMP with student's individualized education programs (IEPs);
- Teacher qualifications;
- Monitoring – Certify Exceptions;
- Training on 3GRG Requirements; and
- Year End Processing Requirements – 3GRG.

Audit Scope

OIA established the scope of the audit to include a review of basic operational aspects of the 3GRG program as they relate to the above sub-processes. Additionally, verification of any compliance requirements, and evaluation of the internal control environments as they relate to the stated objectives. The period of time for the audit included all activity relating to the 3GRG function that occurred from July 1, 2017, through June 30, 2018.

Methodologies

To accomplish our stated objectives, OIA performed the following tasks as they related to those objectives:

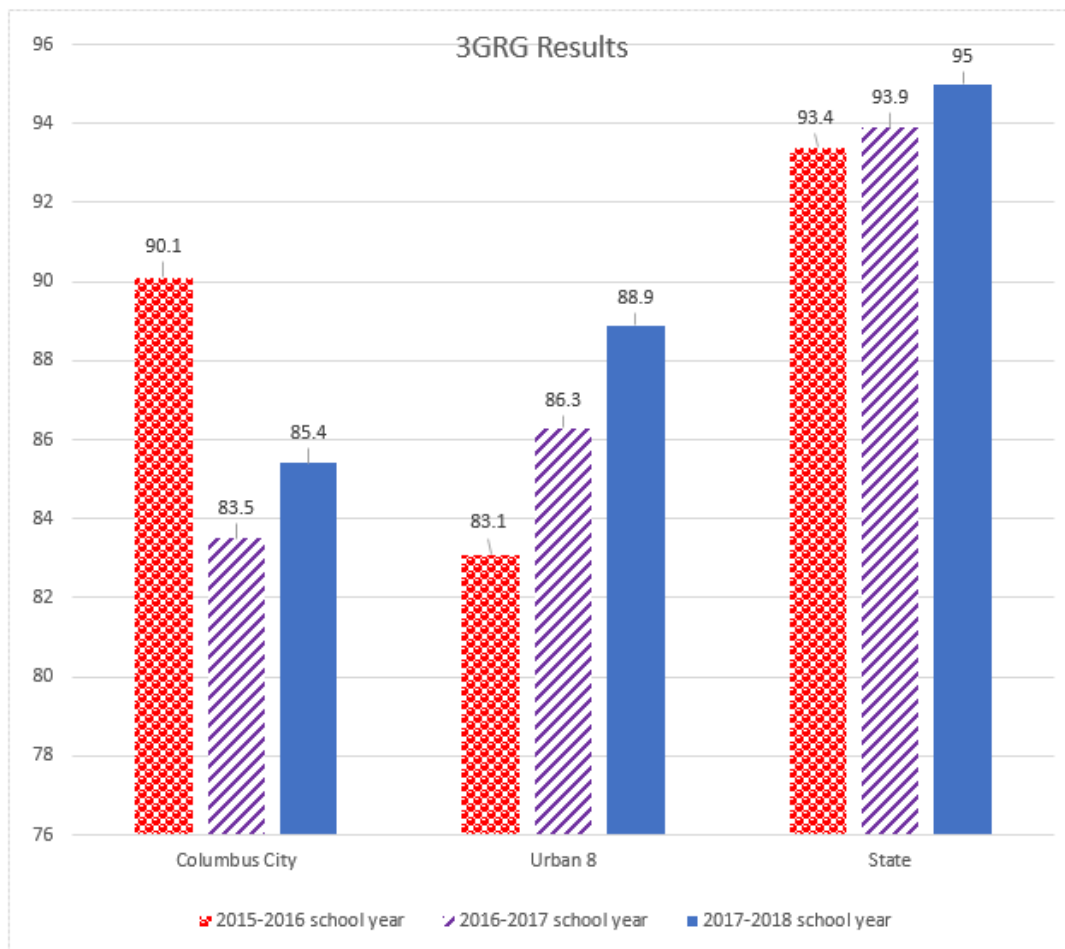
- Reviewed various authoritative literature governing work reviewed (i.e. Relevant Ohio Revised Code & Ohio Administrative Code sections, ODE guidance, etc...);
- Obtained and reviewed relevant Columbus City Schools' (CCS) Board of Education policies;
- Obtained and reviewed relevant District procedures;
- Interviewed various building staff, administration, and senior management involved with the 3GRG program throughout the organization;
- Observation and documentation of key processes;
- Review of management reports, support documentation, and other relevant information; and
- Review of best practices used by other entities performing similar functions.

Background

Ohio's 3GRG program ensures that every struggling reader gets the support they need to be able to learn and achieve. At Columbus City Schools, the 3GRG process is a shared responsibility between the Office of Teaching and Learning, the Office of Special Education, the Office of School Leadership Development, and the Department of Accountability. Each building administrator is responsible for training their staff and compliance with the requirements of the 3GRG program with the assistance of the aforementioned Departments and their leadership.

Reading Improvement Monitoring Programs (RIMPs) allow the teacher and parent / guardian to understand the student’s reading deficiency and to determine the reading interventions to address the noted deficiencies. Districts are required by ORC 3313.608 (C) to develop a RIMP within 60 days after receiving the student’s results on the diagnostic assessment and determining the student has reading skills below grade level. There are various elements required in the RIMP that include, but are not limited to, identification of specific reading deficiency, description of additional instructional services and support that will be provided to the student, opportunities for the student’s parent or guardian to be involved in the instructional services and support, a process for monitoring the extent to which the student receives the instructional services and support, and a reading curriculum during regular school hours.

Based on data available on the ODE Website (<https://education.ohio.gov/Topics/Learning-in-Ohio/Literacy/Third-Grade-Reading-Guarantee>) as of January 11, 2019, the Third Grade Reading Guarantee results for Columbus City Schools, Ohio Urban Eight, and the entire State of Ohio for the most recent three school years were as follows:



Results of the Compliance Audit of the 3GRG program – Issues and Recommendations:

Issue No. 1 – Various Departments involved in the 3GRG process do not have written business objectives, metrics or risk analysis to guide the 3GRG program, determine successes, avoid pitfalls, and enhance its efficiency and effectiveness.

The District's 3GRG program as it relates to the Office of Academic Services, the Office of Teaching and Learning, and the Office of Special Education function does not have business objectives (i.e. accuracy, completeness, consistency, cost-effectiveness, compliance and timeliness) guiding the tasks that involve 3GRG functions and activities. Furthermore, there are no metrics compiled for 3GRG by each location (i.e. notification letters sent / notification letters required at each location; RIMPs completed / RIMPs required at each location; assessments completed / assessments required at each location; required signatures obtained, etc...) that are routinely obtained to identify successes or how efficient and effective the 3GRG program is operating. There is no risk analysis to identify areas where problems could occur.

A sound business practice is to establish business objectives, metrics, and risk analysis that correspond to the District goals for the 3GRG program.

Recommendations

1. Written business objectives should be established by all of the business units involved in the District's 3GRG processes that correspond to the District's goals¹. These objectives should address: accuracy, completeness, consistency, cost-effectiveness, compliance and timeliness.
2. Metrics (notification letters sent / notification letters required at each location; RIMPs completed / RIMPs required at each location; assessments completed / assessments required at each location; required signatures obtained, etc.) should be established to measure the work performed that relates to each business objective. These metrics should be compared to defined benchmarks on a periodic basis (i.e. monthly, quarterly, etc...). This comparison will enable management to identify those areas that are meeting the benchmarks and those that need assistance, as well as students who are not receiving the additional instructional strategy needed to increase their overall reading level.

¹ Columbus City Schools Goals:

Goal 1: Each student reaches the student's full potential; to continue education, serve in the military, go to college, start a business, and enter the workforce as a life-long learner.

Goal 2: The District creates safe, student-centered, innovative learning environments and recruits, develops, and retains world-class talent.

Goal 3: The District is accountable to our communities and customers; confidence in the District is maintained through strategic, responsible and transparent leadership.

3. Risk analysis should be performed for the 3GRG program to identify areas where problems could occur. Once the risks are identified, steps should be taken to minimize the likelihood that this risk will become problematic.

These procedures will help to ensure Management is aware of the successes of the District's 3GRG processes, as well as those areas where successes have yet to be achieved.

Management Response: 1.1. The Department of Accountability and Other Student Services in partnership with the Department of Academic Achievement Support Services will review the Ohio Department of Education's Third Grade Reading Guarantee Guidance Document and will establish business objectives that align with the deliverables within the document. As the Third Grade Reading Guarantee's requirements span each department, the Chiefs will agree as to which objectives will be measured and monitored by which departments. This review will be completed by August 1, 2019. Written Certify rules have been established and will continue to monitor the Notification Letter, Intervention and RIMP for all off-track K-3 students according to the required time frame. This report is emailed to each building principal daily. Each School Leadership Executive Director (ED) will utilize Certify to identify the schools with the most infractions to help prioritize immediate attention and this will be the District's starting point for compliance monitoring during the second quarter. The Department of Academic Services and the Department of Accountability will support principal and teacher growth in developing quality RIMPs through professional development offered during Division Meetings and through additional RIMP clinics. Sample RIMPs, as well as additional trainings, will be offered to administrators. There will be a Fall 3GRG training as a collaboration between the Department of Academic Services and the Department of Accountability for all administrators of K-3 students. The CCS District will provide additional training for alignment through a required PSW course at the beginning of each school year for all Elementary Principals and Teachers of Record (TOR) for off-track students.

1.2. Beginning second quarter of each school year and for each subsequent quarter, School Leadership EDs will review 5 RIMPS each from eight of their schools. They will verify academic completeness of the RIMP, required signatures or documentation of inability to obtain signatures, thus completing an entire Division by the end of the school year. The information will be recorded in a spreadsheet as our evidence of completing the review. Metrics for all CCS are based on required components of 3GRG as defined by ODE.

1.3. The Department of Accountability in partnership with the Department of Academic Achievement Support Services will review the Ohio Department of Education Third Grade Reading Guarantee Guidance Document and will identify risks that may occur during implementation. For each risk, the team will identify steps that will be taken to minimize or mitigate the risk. This will be completed by August 1, 2019. During the ED's regularly scheduled semester walkthrough visits, each principal will be presented a question regarding 3GRG, requiring a response that will be recorded on their OPES rubric. Appropriate interventions will be designed if necessary. Implementation of interventions are dependent upon staffing.

Process Owner: Alesia Gillison, Chief Academic Officer & Dr. Machel Kline, Chief Accountability Officer

Implementation Date: 1.1 Quarter 1 2019. 1.2 & 1.3 Quarter 2 2019.

Issue No. 2 – Parental/guardian notification (Not on Track) letters sent by the District are sent late and/or are missing required statutory elements.

Ohio Revised Code (ORC) section 3313.608(B)(2) and the Ohio Department of Education (ODE) 2017-2018 3GRG Handbook (ODE 3GRG Handbook) stipulates that parents/guardians shall be notified as soon as possible after the student has been identified as reading below grade level and lists various elements required to be included in the written communication.

The 3GRG notification (Not on Track) letters reviewed as part of the detail testing were either not sent to the parents/guardians for 5% (3 of 59) of the sampled student's reviewed or for 16% (9 of 56) of the letters that were sent to the parents/guardians they were sent more than 60 days after the assessment identified the student reading below grade level. The nine letters identified above were sent an average 92 days after the referenced assessment.

Additionally, for the letters that were sent, 34% (19 of 56) of the letters reviewed were missing required elements listed in the above noted ORC section and ODE 3GRG Handbook, including documentation of the current *and* supplemental services.

Recommendation

4. Management should establish a process, including monitoring, to ensure the notification (Not on Track) letters are sent to the parent or guardian within an established timeline from the date of the assessment and that the letter contains all the required elements as documented in ORC 3313.608 and ODE 3GRG Handbook. This will help to ensure the District is in compliance with requirements of the 3GRG program as they relate to parental/guardian notifications.

Management Response: 2.4 Beginning second quarter of each school year and for each subsequent quarter, School Leadership EDs will randomly review 5 RIMPS for the date of the diagnostic results as compared to the "Not On Track" Notification Letter date as well as all required elements of the RIMP from eight of their schools, thus completing an entire Division by the end of the school year. This will ensure that the appropriate notification timeline was met and that the contents of the letters was complete. Should any errors be identified, then the School Leadership Executive Directors will note those errors in the specific principal's OPES walkthrough.

Process Owner: School Leadership Executive Directors

Implementation Date: Quarter 2 2019

Issue No. 3 – Supporting documentation relating to the Reading Improvement and Monitoring Program (RIMP) is insufficient for the required elements.

Ohio Revised Code (ORC) section 3313.608, the Ohio Department of Education (ODE) 2017-2018 3GRG Handbook (ODE 3GRG Handbook) and District policy stipulates the steps that a District must take if a student identified by the diagnostic assessment prescribed under these requirements has reading skills below grade level. These requirements contain specific elements that are required to be included in a RIMP and requirements for 3rd grade teachers employed by the District.

The District requires each of the school buildings to retain a binder (3GRG Compliance Book) at the building level that contains the completed signature page of the RIMP for each student who has one and documentation supporting the criteria indicated by the 3rd Grade teacher on the student's RIMP to support their qualifications required by ORC 3313.608 (H).

During our review of the 3GRG program, we reviewed sixty (60) 3GRG RIMPs and the supporting documentation to ensure compliance with the above noted governance. One of the student's sampled was not required to have a RIMP as they withdrew from the District prior to the RIMP due date. For the other fifty-nine (59), we noted the following during our detail review:

- 85% (50 of 59) of the Personal Learning Plan (PLP) logs reviewed did not indicate the attempted contacts with the parent/guardian regarding the student's RIMP;
- 63% (24 of 38) of the RIMP signature pages that were in the school 3GRG Compliance Book were missing one or more of the three required signatures (teacher, building administrator, and parent/guardian). Attribute did not apply to 21 of the students sampled as there was no RIMP signature page to review (see next comment);
- 36% (21 of 59) of the RIMPs reviewed did not have a copy of the RIMP signature page in the school building 3GRG Compliance Book;
- 58% (34 of 59) of the RIMPs reviewed did not have documented quarterly touch points for one or more quarters;
- 56% (33 of 59) of the RIMPs reviewed did not have documented quarterly reading progress conclusions noted on the RIMP for one or more quarters;
- 44% (26 of 59) of the RIMPs reviewed did not specify the student's reading deficiency;
- 20% (3 of 15) of the RIMPs reviewed for 3rd Grade students did not have the documented support for the criteria indicated on the student's RIMP maintained in the 3GRG Compliance Book. Attribute did not apply to 44 of the student's sampled as they were not in 3rd Grade;
- 40% (4 of 10) of the RIMPs reviewed for students with Individualized Education Programs (IEPs), the IEP was not in alignment with the student's RIMP. Attribute did not apply to 49 of the students sampled as they did not have an IEP;
- 34% (20 of 59) of the student report cards reviewed did not have the required notation in the comment section to communicate to the parent/guardian the students reading progress for one or more of the grading periods;

- 24% (14 of 59) of the RIMPs reviewed did not indicate the parent's involvement;
- 20% (12 of 59) of the RIMPs reviewed did not indicate the supplemental reading instruction provided for the student; and
- 20% (12 of 59) of the RIMPs reviewed did not indicate the progress monitoring tool used to assess the student's reading progress.

Recommendations

5. Management should enhance the current 3GRG process to ensure the RIMP content is complete, accurate, and adequately addresses all required elements. This will help management ensure compliance and identify those locations that are having issues and need additional training and/or support to ensure compliance with the above noted governance.

Management Response: 3.5. The Office of Teaching & Learning will continue to provide a guidance tool to model an appropriately written RIMP. Building Principals will review teachers' RIMPs for completeness and appropriate content and will document the quality of the RIMPs in a teacher's walkthrough or evaluation within the appropriate OTES standard. Appropriate interventions will be designed if necessary. Implementation of interventions are dependent upon staffing.

During the ED's regularly scheduled quarterly data pulls, if a Notification Letter/Intervention Code/RIMP is found to be out of compliance, this will be noted in the principal's evaluation under the appropriate OPES standard.

Process Owner: Sandee Donald, Executive Director, Office of Teaching & Learning, & Building Principals

Implementation Date: Quarter 1 2019

Issue No. 4 – The 3GRG program does not have sufficient monitoring for the 3GRG program.

CCS has three Certify exception reports that identify nonexistence of intervention flags, notification (Not on Track) letters, and RIMPs. However, the Certify reports do not identify when required content is missing in the notification letters and the RIMPs. As previously noted in the detail testing for the notification letters and the RIMPs, there was evidence that documentation included in the notification letters and RIMPs were missing required elements.

Recommendations

6. Management should enhance the current notification letter and RIMP monitoring processes to include a review of fields, either by electronic or human review, within the notification letter and RIMP documents. This review could help to identify missing information in a timely manner and enable District staff to make the necessary additions or entries to comply with noted governance.

Management Response: 4.6. Building Principals will review notification letter, intervention code and teachers' RIMPs for timeliness, completeness and appropriate content. Building Principals will document these qualities during the teacher's walkthrough or evaluation within the appropriate OTES standard.

Process Owner: Building Principals

Implementation Date: SY 2019-2020