



**REPORT OF
THE
STATE AUDITOR**

DEPARTMENT OF EDUCATION

**PERFORMANCE AUDIT
JUNE 2001**

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June 26, 2001

Members of the Legislative Audit Committee:

This report contains the results of a performance audit of the Department of Education. The audit was conducted pursuant to Section 2-3-103, C.R.S., which authorizes the State Auditor to conduct audits of all departments, institutions, and agencies of state government. The report presents our findings, conclusions, and recommendations, and responses of the Department of Education.

Table of Contents

	PAGE
Report Summary	1
Recommendation Locator	7
Colorado’s K-12 Public Education System	11
Chapter 1: School District Reporting	17
The Department Lacks Processes to Detect and Prevent Duplication and Unnecessary Reporting	22
The Department Could Improve Communication With School Districts	24
Colorado Lacks Information on Teacher Supply and Demand	26
Information in School Report Cards Could Be Improved	32
Chapter 2: The Read to Achieve Grant	37
Not All Eligible Students Are Served by the Read to Achieve Program	40
The Department Should Encourage Development of Consortia for Read to Achieve Grants	46
Communication Regarding the Read to Achieve Program Could Be Improved	49
The Department Should Establish and Communicate a Standard Process . . .	51
Chapter 3: Educator Licensing	53
The Department Should Use Additional Resources to Conduct Background Checks	54

	PAGE
Statutes Governing Background Checks Could Be Strengthened	57
Language Should Be Added to Close Loopholes in Department Laws	62
Storage of Educator Licensing Data Could Be Improved	64
District Access to Applicant Information Should Be Streamlined	66
The Department Should Improve School District Reporting of Unlawful Incidents	68
Chapter 4: Regionalization	71
The Department Has Not Established Specific Objectives for the Regional Teams	72
The Department Needs Mechanisms to Evaluate the Regional Approach . . .	75
The Department Should Consider Options for Providing Professional Development Assistance to School Districts	78
Appendix A	A-1
Appendix B	B-1
Appendix C	C-1



**STATE OF COLORADO
OFFICE OF STATE AUDITOR**

REPORT SUMMARY

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State Auditor

**Department of Education
Performance Audit
June 2001**

This performance audit of the Department of Education was conducted under the authority of Section 2-3-103, C.R.S., which authorizes the State Auditor to conduct audits of all departments, institutions, and agencies of state government. The audit was conducted in accordance with generally accepted auditing standards. The audit work, which included gathering information through interviews, reviewing documents, and analyzing data, was performed between October 2000 and April 2001.

This report contains findings and recommendations relating to the Department's collection of data from school districts, administration of the Read to Achieve grant program, issuance of educator licenses, and regionalization of services. We acknowledge the efforts and assistance extended by staff of the Department. The following summary provides highlights of the comments, recommendations, and responses contained in the report.

Overview

The Colorado Department of Education oversees educational activities in 176 school districts and more than 1,600 public elementary and secondary schools around the State. As of fall 2000 these schools enrolled over 724,000 students and employed over 41,000 teachers. In Colorado, the State Board of Education and the Department have responsibility for supervising the public education system as a whole, while local boards of education have control of instruction in their districts.

For Fiscal Year 2001, total funding for public elementary and secondary education is over \$3.7 billion. These funds provide per pupil operating revenue averaging \$5,167 for Colorado school districts. The majority of education moneys are from the state general fund appropriation, followed by local, federal, and cash funding.

Following is a summary of our comments and recommendations.

The Department Could Streamline Reporting by School Districts

School districts in Colorado are required to report a variety of information to the Department throughout the year, such as district revenues and expenditures and student counts for use in calculating school district funding. We interviewed superintendents and administrators at 18 school districts about data reporting and found they have concerns about the volume of reporting, duplication, and unclear communication about the need for and use of the data. We identified several areas where the Department could reduce the data reporting burden.

For further information on this report, contact the Office of the State Auditor at (303) 866-2051.

First, the Department collects detailed information in the human resources area that is not necessary. The Department asks school districts to report the teaching subject area of each teacher, using 20 main subject area categories (such as math, science, and English) and over 200 subcategories (such as algebra and special education). However, the information provided by school districts is inconsistent, with a few using the detailed categories to some extent, but most reporting only in the main subject areas. Second, various units within the Department require districts to report information that may be duplicative. This occurs when different units in the Department need the same information from school districts but in slightly different formats. Finally, school districts we interviewed noted that they often do not know how the data they are reporting will be used and do not receive useful information back from the Department based on what they have reported.

Currently the Department does not have a process that involves school districts in reviewing requirements to avoid duplication and coordinate reporting. **We recommend that the Department improve its data reporting processes and related communication by (1) establishing an ongoing review group to assess reporting requirements and evaluate information reported back to districts and (2) expanding use of the Internet to explain reporting requirements and obtain feedback from school districts.**

Colorado Lacks Information on Teacher Supply and Demand

Although the Department has some information on teacher availability (in terms of individuals licensed to teach in Colorado) and teacher employment needs (in terms of school district employment data) it has not analyzed teacher supply and demand trends for the State. We compared data maintained by the Department on the number of licensed teachers, the number of teaching endorsements, and the number of teachers employed in public elementary and secondary schools in Colorado. We found there are over 60 percent more teacher licensees than there are teachers employed in the public schools. We also found there is overall consistency in the breakdown of teachers and teaching endorsements among subject areas. For example, the most common single endorsement area and teaching area is “General Preschool and Elementary Education,” making up roughly 40 percent of both endorsements and teachers. The Department could do further analysis with the information it currently has available. **We recommend that the Department examine and report on teacher supply and demand in Colorado.**

Report Card Data Should Be Verified

In 2000 the General Assembly passed legislation requiring the Department of Education to produce school report cards for every public elementary and secondary school in the State. The purpose of the report cards is to better inform parents and community members about the quality of Colorado schools. By statute, school report cards will include an overall academic performance grade based on Colorado Student Assessment Program (CSAP) scores, school staff information such as student to teacher ratios,

and school safety information including the number of incidents involving drugs and alcohol. In addition, the report cards are required by statute to contain the statement “School Report Cards prepared by the Colorado Department of Education are independently audited and verified by [name of firm].” However, this statement is misleading, implying a level of review that does not exist. The only verification that is planned is an independent review of the process of preparing the report cards, not a verification of the data in the report cards. Without verification of reported data, readers have no assurance that the information contained in the report cards is reliable. Although auditing all the data included in the report cards is a major undertaking, **the Department should consider having school districts expand the procedures conducted by their independent audit firms to cover report card data. In the absence of audit procedures, the report cards should disclose that all the information is reported by school districts and is not checked for accuracy.**

Not All Eligible Students Are Served by the Read to Achieve Program

Among the most recent major initiatives in the Department of Education is the Read to Achieve grant program, which was created in 2000 using Tobacco Litigation Settlement Cash Fund moneys. The program is structured to competitively award grants to individual schools to fund intensive reading programs for pupils in the 2nd and 3rd grades whose reading skills are below the levels established by the State Board of Education. For the first funding period of January 2001 through June 2002, over \$36 million was available for grants. The Department received 605 applications and awarded grants to 414 schools totaling over \$26 million.

A primary goal of the Read to Achieve program is for “all Colorado students to be proficient readers by the end of the 3rd grade.” However, because the grant process is competitive, funding is not distributed to schools based on the presence of eligible students. Using data from the Department, we estimate there are nearly 38,000 students in the State who are eligible to participate in Read to Achieve programs in the first grant period. According to the Department, the schools receiving grants for the January 2001 through June 2002 period will provide reading programs to nearly 21,000 pupils, or about 55 percent of eligible students. We estimate another 7,000 students may have the opportunity to participate in Read to Achieve programs to be funded in a second grant round for next fiscal year. However, this still leaves about 10,000 eligible students attending schools without Read to Achieve grants.

Changes to the current grant structure would help ensure participation of more eligible students at a potentially lower cost. There are several options that should be considered, which may require legislative changes, including (1) designating a certain portion of the available funds to various categories such as small or rural schools, then allowing schools within each designated portion to compete for the available funds, (2) offering a minimal amount of funding to each school but allowing competitive applications to be submitted to obtain additional resources, or (3) distributing grants on a formula basis, with a calculated amount per eligible student being allocated to each school. **The Department should pursue alternatives**

for administering the Read to Achieve Program to ensure distribution to a greater number of eligible students.

The Department Should Allow Joint Applications for Read to Achieve Consortium Programs

For the Read to Achieve program, groups of schools were encouraged to apply as consortia, but each individual school within a consortium was required to submit an application. For the first grant round, the Department received 199 grant proposals from schools applying as consortia members and 406 proposals from schools with individual programs. We found that 77 percent of the consortium applicants were approved for funding compared with 64 percent of the individual school applicants. However, schools within a consortium were not universally successful in obtaining grants. There were variations in how consortium applications were evaluated, which resulted in some schools within a consortium receiving funding while others did not. In part this may be due to the fact that the consortium concept was not clearly defined. Department managers stated that the requirement for schools to submit individual applications was based on interpretation of the statutes. However, Section 22-7-506, C.R.S., refers to schools “apply[ing] jointly,” which appears to allow combined applications for schools within a consortium. We believe **the Department should clearly define a consortium for purposes of the Read to Achieve grant, then develop procedures to permit combined applications.**

Educator Licensing

In Fiscal Year 2000 the Department issued over 25,000 licenses and authorizations to teachers, special services providers (such as school psychologists and nurses), administrators, and principals. License types include a provisional license for new teachers and a professional license, which is the standard license for Colorado teachers. When applying for a provisional license, individuals provide the Department with a form attesting to any criminal convictions other than traffic violations and a fingerprint card. The fingerprints are sent to both the Colorado and Federal Bureaus of Investigation, where they are checked for arrests. On the basis of the fingerprint results, Department staff conduct an investigation of anyone with a criminal history. One information source used by the Department for background checks is CoCourts.com, the public access Website of the State Judicial Department.

We asked the Judicial Department to check over 8,500 teaching licenses granted between July 2000 and January 2001 against its records. The check identified numerous misdemeanor and traffic violations as well as 16 felonies, including theft, possession of illegal substances, menacing, and forgery. The Department of Education was previously aware of 14 of the felony cases and has since investigated the other 2, which were not known to the Department prior to our check. For one of these cases the Department has determined that the license should remain in effect. The other case will be presented to the State Bard of Education for disciplinary action such as license suspension or revocation.

Although Department staff indicated that checking all applicants against Judicial records is valuable, they believe current resources are not sufficient for the task. Being able to access Judicial records in large batch format would provide an efficient way for Department of Education staff to investigate all license holders more completely than is currently possible. Therefore, **we recommend the Department work with the Judicial Department to establish a system to have applicant information compared with Judicial records in periodic batches.**

Statutes Governing Background Checks Could Be Strengthened

We found the Department's statutory authority and responsibility for conducting background investigations and issuing educator licenses are less than comprehensive. Specifically, the statutes:

- Permit, but do not mandate, the denial, suspension, or revocation of an educator license because an individual has committed or has a pattern of committing any particular crime.
- Prohibit the denial, suspension, or revocation of an educator license based solely on an individual's conviction of a felony or other offense of moral turpitude.
- Do not define school-aged children in the public schools as "vulnerable persons" who need protection because of their age.
- Contain provisions that allow some individuals, such as those with licenses from another state or with certifications from a national education foundation, to obtain licenses without undergoing a fingerprint check or background investigation.

The lack of clarity and specificity in the statutes poses increased risks that someone with a potentially dangerous history could obtain a license. In addition, because the State Board does not have standard, documented criteria in law or rule to support its decisions, there may be a greater possibility that an individual could successfully challenge a denial or revocation. **The Department should propose legislation to strengthen current licensing laws.**

The Department Needs Clear Objectives and Evaluation Mechanisms for Its Regional Approach

In 1999 the Department established eight regional service teams in the State. Each team includes a manager and a regional coordinator, as well as specialists in various areas such as special education and professional development. The overarching goal of the regional service teams is to improve academic achievement across the State. Teams are generally expected to promote efficiency and help school districts get their Accreditation Contracts approved. However, the Department has not developed any specific

objectives to support the broad goal of the regional teams, nor has it clearly defined the teams' role in accomplishing the goal. As a result, services vary, with some teams actively helping districts align their curriculum to state standards and other teams serving more as information conduits by responding to questions and keeping districts informed of new developments. In addition, the Department has not developed a comprehensive mechanism to assess the regional service team effort as a whole and cannot determine if the \$1.2 million and 16 FTE allocated to the teams are being used efficiently or if the intent of the regional approach is being accomplished. **The Department should improve its regional approach by establishing specific, measurable objectives for the teams; defining the roles of the teams in improving student achievement; and establishing formal mechanisms to evaluate the regional service teams and the regionalization effort.**

A summary of responses to the audit recommendations contained in the report can be found in the Recommendation Locator.

RECOMMENDATION LOCATOR

Rec. No.	Page No.	Recommendation Summary	Agency Addressed	Agency Response	Implementation Date
1	22	Reduce reporting of unnecessary data by school districts.	Department of Education	Partially Agree	Summer 2002- January 2003
2	25	Improve communication with school districts regarding the need for and use of data that are required to be reported.	Department of Education	Agree	Fiscal Year 2002
3	31	Examine and report on the supply of and demand for public elementary and secondary education teachers in the State.	Department of Education	Partially Agree	Fiscal Year 2003
4	35	Implement procedures to ensure that the data contained in school accountability reports are accurate and comprehensive.	Department of Education	Partially Agree	Fall of 2001
5	44	Pursue alternatives for administering the Read to Achieve program to ensure distribution of funds to a greater number of eligible students.	Department of Education	Partially Agree	Spring 2001
6	48	Improve the application process for consortium applicants in the Read to Achieve program.	Department of Education	Agree	Fall 2001

RECOMMENDATION LOCATOR

Rec. No.	Page No.	Recommendation Summary	Agency Addressed	Agency Response	Implementation Date
7	50	Improve communication with Read to Achieve applicants through individualized letters regarding grant awards and expanded written feedback.	Department of Education	Agree	June 2001
8	52	Improve administration of the Read to Achieve program by establishing and communicating a standard process.	Department of Education	Agree	June 2001
9	56	Increase the use of Judicial Department records in conducting background checks of educator license applicants.	Department of Education	Agree	Summer 2001
10	61	Propose legislation to strengthen current licensing laws to clarify what offenses will prohibit a person from obtaining an educator license and what populations are being protected.	Department of Education	Partially Agree	2002 Legislative Session
11	63	Propose statutory changes to add language giving the Department specific authority to conduct complete background investigations on educator license applicants or holders as deemed necessary.	Department of Education	Agree	2002 Legislative Session
12	66	Improve data management and retrieval in the Licensing unit, using a new scanning system.	Department of Education	Agree	Fall 2001

RECOMMENDATION LOCATOR

Rec. No.	Page No.	Recommendation Summary	Agency Addressed	Agency Response	Implementation Date
13	68	Expand the system used by districts to check the license status of potential employees.	Department of Education	Agree	Fall 2001 and 2003-2004
14	70	Develop and distribute a standard form for school districts to make required reports of incidents of personnel involved in illegal or unethical behavior.	Department of Education	Agree	Fall 2001
15	74	Clearly define and communicate the roles, services, and resources of the regional education approach.	Department of Education	Agree	Fiscal Year 2002
16	76	Establish formal mechanisms to evaluate the regional service teams and the regionalization effort overall.	Department of Education	Agree	Fiscal Year 2002
17	80	Consider alternatives for distributing professional development funds and services to school districts, and evaluate the Regional Assistance Centers at the end of 2001.	Department of Education	Agree	Fiscal Year 2002

Colorado's K-12 Public Education System

The Colorado Department of Education oversees educational activities in 176 school districts and more than 1,600 public elementary and secondary schools around the State. As of fall 2000 these schools enrolled over 724,000 students and employed over 41,000 teachers. In accordance with the Colorado Constitution and statutes, elementary and secondary public education in Colorado is managed at the state level by the State Board of Education and the Department of Education and at the local level by school district boards of education. Specifically, the State Board and the Department have responsibility for supervising the public education system as a whole, while local boards of education have control of instruction in their districts.

State Board and Department of Education

The State Board of Education is composed of seven elected officials—six representing Colorado's congressional districts, plus one member at large. According to statutes, the State Board provides educational leadership for the State in the following ways:

- Appraising and accrediting the public school districts in the State and submitting recommendations to the Governor and General Assembly for improvements in education.
- Establishing policies, rules, and regulations concerning general supervision of the public schools, the Department, and educational programs for pre-kindergarten through the 12th grade, as well as adult education.
- Prescribing standards for the evaluation of teacher preparation programs and licensing.

The Department of Education is described in statutes as including the State Board, the Commissioner of Education, assistant commissioners, other officers and employees, and the State Library. Operationally, the Department serves as the administrative arm of the State Board, functioning as a link between the State Board and the school districts. Specifically, the Department is responsible for:

- Providing regulatory and oversight functions for the education system such as through the issuance of educator licenses.
- Providing consultation services to school districts, particularly through its regionalization efforts, on various aspects of school administration such as assessment and accreditation.
- Administering and distributing funds for a variety of federal and state educational programs such as the Read to Achieve grant program for student literacy.
- Collecting, evaluating, and compiling information from school districts for oversight of district activities and for use in developing new education policies.

The Department has adopted a commitment statement to increase achievement levels for all students through comprehensive programs of education reform involving the following three elements:

- High Standards for what students must know and be able to do;
- Tough Assessments that honestly measure whether or not students meet standards and tell citizens the truth about how well our schools serve children; and
- Rigorous Accountability Measures that tie the accreditation of school districts to high student achievement.

Policy Changes Impacting the Department of Education

Recent changes in statutes and the State Constitution have had a significant impact on the Department, including the following:

Senate Bill 2000-186 established a state data reporting system to enable the Department to produce school report cards. The bill also expanded the Colorado Student Assessment Program (CSAP) and established procedures to convert schools with failing academic performance grades to independent charter schools.

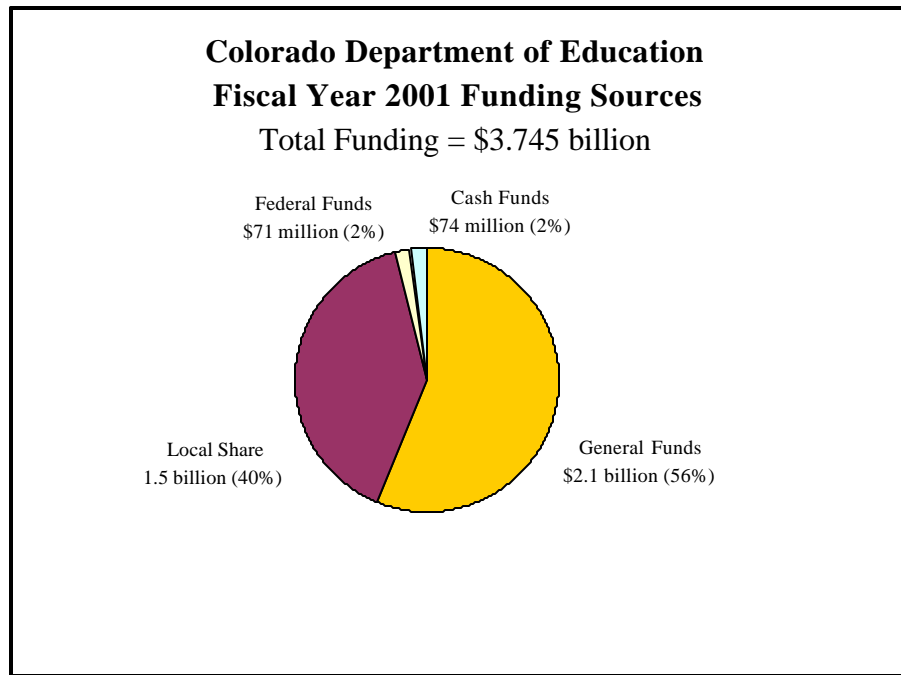
Senate Bills 2000-71 and 2000-124 established the Read to Achieve program, which provides grants to schools to fund intensive reading programs for elementary school pupils whose skills are below the level established for their grade level. This program is funded with moneys from the Tobacco Settlement Agreement.

House Bill 2000-1151 addressed out-of-state educator licensing requirements, giving the State Board power to grant licenses if (1) the applicant has held a comparable license in another state, (2) the standards for the license in the other state meet or exceed the standards for such a license in Colorado, and (3) the applicant can provide documentation of three years of continuous, successful, evaluated experience as a teacher.

House Bill 2001-1262 and Senate Bill 2001-204 contain provisions to implement Amendment 23, which was approved by Colorado voters in November 2000. This constitutional amendment will generate an estimated \$4.6 billion in new funding over the next ten years. This amendment directs the Legislature to increase educational spending by at least the rate of inflation plus 1 percent over the next decade and by at least the rate of inflation thereafter.

School District and Department Funding

For Fiscal Year 2001, total funding for public elementary and secondary education is over \$3.7 billion. These funds provide per pupil operating revenue averaging \$5,167 for Colorado school districts. The majority of education moneys are from the State General Fund appropriation, closely followed by the local share of funding. The chart below shows the breakdown of funding sources.



Source: Data provided by the Department of Education.

The funding sources can be further broken down as follows:

- The Local Share of funding has two main sources—property taxes generating about 90 percent and specific ownership (vehicle registration) taxes making up the remainder.
- Cash funds come primarily from interest on the Public School Fund (about 52 percent), federal mineral leases (about 32 percent), and rents from State Trust Lands (about 14 percent).
- The majority of federal funds are made up of Special Education moneys.

Audit Scope

This audit focused on activities that have widespread impact on the State's school districts as well as on several recently initiated education programs. The report discusses our findings in the following areas:

- *School District Reporting.* Districts report a wide variety of information throughout the year to fulfill numerous requirements. Our review evaluated the underlying requirements for school district reporting and identified areas to streamline this activity.
- *The Read to Achieve Grant Program.* This legislatively mandated program began in Fiscal Year 2001. We assessed the Department's administration of the program for efficiency and equity and determined that changes in both the statutes and Department procedures should be considered.
- *Educator Licensing.* The Department is the sole agency responsible for licensing public elementary and secondary educators in the State. We focused on the laws and processes surrounding background checks of license applicants and found a need to strengthen the statutes relating to educator background investigations.
- *Regionalization.* In 1999 the Department reorganized to provide better service and communication to school districts through regional teams of Department staff. Our evaluation considered the planning for and structure of these regional teams and led to recommendations to better define the teams and the services they provide.

School District Reporting

Chapter 1

Background

School districts in Colorado are required to report a variety of information to the Department of Education throughout the year. For example:

- School district revenues and expenditures are reported annually for use in education funding, oversight, and statistical reporting.
- Human resource data such as the names, teaching areas, school location, and salaries of teachers are reported both for state-level comparisons and for compliance with federal grant requirements.
- Student graduation and dropout rates are reported after the end of each school year and are used to compare districts, analyze trends, and compile school accountability reports.
- Student counts are reported each fall for use in calculating school district funding.

Three years ago the Department implemented a new, on-line system called the Automated Data Exchange, which allows school districts to submit financial, human resources, and student count data electronically. According to Department staff, other data reporting, including graduation and dropout rates, will be incorporated into the Automated Data Exchange system by next year. Appendix A contains a matrix of the primary school district reporting requirements, submission methods, and uses of the data.

School Districts Cite Concerns With Reporting Requirements

As part of our review we interviewed superintendents and administrators at 18 school districts of varying sizes and in different geographic locations around the state. Districts we spoke with indicated that the Department has made efforts to reduce reporting requirements and that the Automated Data Exchange has streamlined the districts' efforts.

However, all but two districts also voiced concerns about data reporting. Their main concerns related to the volume of reporting, duplication, and unclear communication about the need for and use of the data. Specific comments included the following:

- The State keeps asking for more and more information without seeming to understand that adding a few required reporting fields is very resource demanding.
- The Department asks for the same information on multiple occasions but in different formats. Duplication in reporting is frustrating because time spent filling out reports could be used teaching kids. The requirements should be better coordinated and combined.
- There seems to be confusion within the Department, or a lack of communication, because one unit asks the district for information that is essentially the same as is required by another unit, just in a different format.
- There are no clear-cut definitions regarding the information the Department wants, and there is no explanation as to why such information is needed.

We reviewed reporting requirements for school districts and found that there are several areas where the Department could reduce the data reporting burden and make greater use of some of the data it collects.

Unnecessary Detail Increases the Reporting Burden

The Department collects a significant amount of data relating to school district staff. Each December, school districts are required to report to the Department information such as name, social security number, e-mail address, date of birth, school, employment area, degree area, and salary, for every teacher, administrator, professional, and support staff employed in Colorado's K-12 public schools. The data are submitted to the Department's Research and Evaluation Unit, using the Automated Data Exchange system. School districts we contacted reported that staff data are some of the most labor-intensive to compile and report, primarily because of the significant level of detail required.

One example of such detailed reporting is a section within the human resources report called "Teaching Area," which identifies the instructional area for each teacher. In the "Teaching Area" section, there are classifications for general pre-school, elementary, middle/junior high, and high school teachers. Teachers not reported within one of these

general categories are classified within 20 main subject areas (such as math, science, English, and music) and over 200 subcategories (such as algebra, social sciences, and special education).

We reviewed information reported to the Department in 1999 and found that the human resources reporting for senior, vocational, and alternative schools contains some detail that is unnecessary and inconsistently provided by districts. We noted the following problems with this detailed reporting:

- The majority of teachers were reported as providing instruction in general subject areas, such as science or math. Only 12 percent were reported as teaching in a specific subcategory such as geometry (six teachers), anthropology/sociology (three teachers), or English composition (two teachers) for all 176 school districts in Colorado.
- The categories are redundant and undefined. For example, a district can classify a teacher under a main category, such as “Math,” or under a “General Math” or “Other Math” subcategory. Although Department staff told us there are differences among these subcategories, we could find no explanation of them in the report format or definitions supplied to school districts.
- The detailed categories do not reflect actual practice. According to Department staff, it is not uncommon for teachers to provide instruction in several subjects, such as geometry and algebra, within a general subject area. Therefore, the general categories more accurately indicate teaching assignments.

Since school districts do not use the detailed categories to report information, the categories have little or no value and we could find no federal or state laws that required this detailed information. In addition, Department staff acknowledged that the detail is not used except to prepare a federal report on the number of math, science, and computer technology teachers in the State.

Some Required Reporting Is Duplicative

In reviewing school district reporting requirements, we found that various units within the Department require districts to report information that may contain redundancies. One example is that both the Research and Evaluation unit and the Special Education unit collect some human resource data. Specifically, in addition to the general personnel reporting described above, districts mail a diskette to the Special Education Unit each year with information on the State’s special education teachers. These teachers represent

almost 9 percent of all the teachers employed in the public schools. Special Education data reported by school districts include name, date of birth, social security number, teaching subject area, and school for each Special Education instructor.

Department staff indicated that the main barrier to eliminating the duplication of human resources reporting is that special education data are reported by "administrative unit," while general staff data are reported by each school district. An administrative unit is the entity responsible for managing special education services for a designated population. Although many school districts are administrative units themselves, others form consortia or are members of Boards of Cooperative Educational Services (BOCES) that serve as administrative units. For the Research and Evaluation unit to use special education data, the unit would have to disaggregate the information to the school district level. Conversely, for Special Education to use the information submitted to Research and Evaluation, it would have to summarize the data at the administrative unit level. The Department has not developed systems or processes to manage the data in this way.

Coordination of Reporting Formats Could Help Reduce Duplication

An issue that contributes to the duplication of reporting, cited by a number of school districts, is that any given element of data may be coded differently for different purposes. For example, the financial reporting system and the human resources report use different codes to designate a paraprofessional staff. One district we spoke with noted that this difference has caused problems for two years and requires that the codes be manually entered into the human resource report for accuracy. Without this manual correction, the human resources report is rejected by the Department.

Several school districts cited another example related to similarities in data reported for the October student count and for Colorado Student Assessment Program (CSAP) test labels. The following table compares some of the elements included in these reporting efforts.

Data Reported by School Districts for Each Student for October Counts and CSAP Labels		
Data Element	October Student Count Format	CSAP Label Format
Birth Date	8-digit code (MMDDYYYY)	6-digit code (MMDDYY)
Gender	2-digit code (01=Female; 02=Male)	1-character code (M or F)
Grade	3-digit code (16 options)	2-digit code (8 options)
School Code	4-digit code	4-digit code
Ethnicity	2-digit code (5 options)	1-digit code (5 options). Not a required element.
Language Information	English Language Learner - Y or N. Reported for students whose primary or home language is not English.	Language Background - an alphanumeric code indicating the student's language background.
Source: Office of the State Auditor analysis of reporting formats.		

Each of the above reports also contains various additional reporting elements. For example, the October student count includes attendance information and the student's eligibility for free or reduced-price lunches while the CSAP label files include migrant status and the length of time the student has been in the school and district.

As the table shows, although the two data collection efforts contain some similar or identical information, the coding of the data varies. Because of the formatting differences, the school districts we contacted noted that they were not able to use the student count report as the basis for the CSAP labels, but instead were required to create a new report. Department management indicated that, because students can move among districts and schools, as well as into and out of the State, data collected in October may no longer be accurate when the CSAP exams are given in the Spring. In addition, CSAP exams are batched by classroom while October count data is provided by school. Despite these differences, the Department could work with school districts to make the reports as similar as possible and eliminate coding and formatting variations to simplify data compilation and reporting.

The Department Lacks Processes to Detect and Prevent Duplication and Unnecessary Reporting

Currently the Department does not have an internal process to review the reporting requirements of all units to avoid duplication and coordinate reporting to address coding and formatting differences. Furthermore, the Department does not have a systematic method to gather feedback from school districts on all reporting requirements.

The Department used to have a Data Acquisition and Reporting Utilization Committee that included both Department and school district representatives who reviewed all reporting requirements and had authority to approve Department requests for school district reporting. Department staff indicated that this Committee was disbanded for two reasons. First, the Department had reduced its reporting requirements significantly, so there was little need for the committee. Second, the approval process had become too time-consuming for both district and Department staff, and participation in the Committee had declined.

We believe the Data Acquisition and Utilization Review Committee provides a model that could be updated to serve the Department's current needs for managing data reporting. The Department should establish an ongoing review group that includes Department and school district representation to assess reporting requirements on a routine basis. The Department should also consider obtaining school district input on reporting requirements by establishing an Internet site that describes any planned data collection by the Department and allows districts to comment on the plans.

Recommendation No. 1:

The Department of Education should take additional steps to reduce reporting of unnecessary data by:

- a. Eliminating the detail categories in the Teaching Area of the human resources report and reviewing the remainder of the report to identify any additional unused information that should be removed.

- b. Implementing methods, including the use of a review committee, to regularly assess all requirements for school district reporting and to coordinate and combine data collection across Department units.
- c. Expanding use of the Internet and exploring other approaches to obtain school district feedback on reporting requirements.

Department of Education Response:

Partially agree.

- a. Districts need to provide a four-digit code for subject area taught for all teachers. Eliminating the detail in the Teaching Subject Area reduces the options that districts have available to them; it does not reduce the size of the data file submitted to CDE. However a restructuring of the options may require some programming in those districts that currently are using the detail level. The time and expense of reprogramming may be more of a problem than the current level of detail.

CDE will meet with school district personnel to discuss this issue and will look at eliminating unnecessary fields through this planned revision process.

- b. There are several examples of the Department involving school districts in decisions about data collection, including the following:
 - For each of the Automated Data Exchange Projects completed to date (finance, human resources and the October student count) committees of school district people with experience in the field were convened to plan and pilot the new systems.
 - CDE Special Education data collectors meet regularly with district Special Education staff to discuss data collection.
 - The Assessment Unit meets monthly with two advisory committees with representation from school districts. One committee provides technical advice and the other advises on policy issues.
 - For the Report Card, a special group was convened to assist CDE in developing guidance for the safety collection.

In addition, for the last 6 to 8 years, an internal group has been meeting to look at duplication within the Department's data. However, we agree that it would be useful to have an expanded group of people, which includes district personnel and other data users to review data requirements in order to coordinate and combine data requirements.

- c. We continue to expand the use of the Internet as a tool to communicate with district personnel.

The Department Could Improve Communication With School Districts

Changes in laws and regulations frequently lead to new or modified requirements for school districts to report data to the Department of Education. School districts we interviewed noted two specific areas of concern surrounding communication from the Department about these changing requirements. First, half the districts we spoke with indicated they often do not know how the data they are reporting will be used. As a result, they worry about inaccurate interpretation and use of the data for unintended purposes. One district pointed out that the Department requests e-mail addresses for all staff as part of its human resources data collection, but districts do not know why this information is needed. In addition, as discussed earlier in this chapter, we found some unnecessary human resources information is being collected by the Department.

Second, five districts mentioned that they do not receive useful information back from the Department based on what they have reported. For example, districts report school personnel information including teacher salaries. However, districts noted that summary and comparative information is not available from the Department until the following school year. In addition, the Department prepares a school district revenues and expenditures report based on information reported by districts. However, one school district superintendent stated that the report would be more useful if, rather than being a simple compilation, the Department conducted some analysis of the data. This report is also produced a year after the information is reported to the Department.

The Department has taken steps to improve communication with the school districts. For example, the Department recently posted a document on its Web site listing some of the uses of the October student count data. We believe the Department should expand these efforts to provide more information to school districts about the use of and need for data that are required to be reported. In addition, the reporting review committee that was

suggested in our previous recommendation should also have responsibility for evaluating and improving the information that is distributed to school districts based on their reporting.

Recommendation No. 2:

The Department of Education should improve communication with school districts regarding the need for and use of the data that are required to be reported. Specifically, the Department should:

- a. Add explanatory language to its report formats addressing the intended use of and need (statutory or regulatory requirement) for all data requested.
- b. Work to compile and disseminate useful, timely, summary, and comparative information back to school districts based on what the districts have been required to report.
- c. Expand the use of the Internet to provide explanatory information on data reporting requirements and to provide data results back to school districts.

Department of Education Response:

Agree.

- a. Staff is working on implementing this change. The Research and Evaluation Unit has already prepared this material and it will be added to the documentation for each collection this fall. The Department will ask all data collectors to do the same.
- b. One of the functions of the ADEP Data Collection Advisory Committees is to provide feedback on the type of summary reports that they would like to see published on CDE's website. As an example several different reports were presented to the Human Resources Committee and they chose those that they felt were most communicative and beneficial to their personnel colleagues in other districts.

The timeliness of the data reports is dependent not only upon CDE staff time, but are also heavily dependent upon when CDE receives approved data files from school districts. As of May 18, 2001, CDE had not received approved Human Resources files, which were due December 31, 2000 from two school

districts. March Report Card data was due April 6, 2001 and two districts are still outstanding. Student October files were due by November 15th for the majority of districts (some districts had Special education or CPP waivers until early December) and two districts approved final files after December 15th.

- c. We have been expanding our use of the Internet. All new data collection is through use of the Internet for data transmission. We are putting more data on the Web site all the time. Research and Evaluation is aware of places in need of more explanatory information. This is being addressed.

Colorado Lacks Information on Teacher Supply and Demand

Despite the volume of information collected from school districts, the Department of Education has only general information about teacher supply and demand issues in the State. For example, the Department informed us that:

- There are about 50 percent more licensed educators than there are teachers currently employed in the public schools.
- There is a longstanding shortage of special education teachers.
- There are typically more licensed teachers with physical education endorsements than are needed to fill teaching positions.

The Department does not know the specific reasons for the discrepancies in the number of licensees and the number of publicly employed teachers or the cause of shortages or oversupply in particular areas. A 2000 report by the National Conference of State Legislatures entitled "Teaching in Colorado: An Inventory of Policies and Practices" pointed out that:

Colorado has no data system available to analyze teacher supply and demand systematically, so the state can provide districts with little guidance to assist with recruitment efforts. Without statewide data, both traditional and alternative preparation programs have no means to assess ... [the] fields [in which] to train and recruit potential teachers to ensure supply....

We agree that no systems to analyze teacher supply and demand exist. In fact, we could find no state agency in Colorado, including the Department of Higher Education, that routinely collects and analyzes information on the supply of and demand for teachers. Department of Education staff reported that school districts sometimes conduct analyses for their own recruitment and planning purposes, but they are limited in scope and restricted to their own districts. However, the Department of Education does have some information on teacher availability (in terms of individuals licensed to teach in Colorado) and teacher employment needs (in terms of school district employment data) that could be analyzed to provide some rudimentary information on teacher supply and demand trends for the State.

Data on Educator Licensees and Teaching Positions Could Be Put to Better Use

In addition to the staff data reported by school districts, the Department has information on all licensed teachers, special services providers, administrators, and principals in the State. The Licensing unit collects this information from applications, transcripts, and background checks. Information maintained by the Licensing unit includes the name, social security number, license number, college attended, area of study, and license endorsement area of every licensed educator.

We compared the number of individuals licensed to teach with the number of teachers working in public elementary and secondary schools in Colorado. We found there are about 60 percent more teacher licensees (about 66,000) than there are teachers employed in the public schools (about 42,000).

We also compared the number of current teaching license endorsements with the number of teachers in K-12 public schools by subject area. We calculated a breakdown of both licenses and teachers by general subject area to make a rough determination of whether individuals obtain educator licenses in the subject areas where employment opportunities exist. The following table shows our comparison of main subject areas.

Comparison of Endorsement Area of Educator Licensees and Teaching Subject Area					
Subject/Endorsement Area	Licensee Endorsements ^[1]		Teachers in Subject Area ^[2]		Ratio of Endorsements to Teachers
	Number	% of Total	Number	% of Total	
Art	1,963	2.4%	989	2.3%	2.0 to 1
English/Language Arts	7,349	9.1%	3,496	8.1%	2.1 to 1
Foreign Languages	2,280	2.8%	1,204	2.8%	1.9 to 1
Physical Ed./Health/Athletics	5,031	6.3%	2,763	6.4%	1.8 to 1
Math	3,199	4.0%	2,463	5.7%	1.3 to 1
Music	2,404	3.0%	1,304	3.0%	1.8 to 1
Science	4,094	5.1%	2,242	5.2%	1.8 to 1
Social Sciences	5,773	7.2%	2,349	5.4%	2.5 to 1
General Pre-School & Elementary	34,447	42.8%	16,285	37.6%	2.1 to 1
General Jr., Mid., & High School ^[3]	483	0.6%	4,269	9.8%	0.1 to 1
Special Education	10,325	12.8%	3,360	7.8%	3.1 to 1
Business & Marketing	1,250	1.6%	606	1.4%	2.1 to 1
Other ^[4]	1,895	2.3%	2,023	4.5%	0.9 to 1
Total	80,493	100.0%	43,353	100.0%	1.9 to 1

Source: Office of the State Auditor analysis of data from the Department of Education.

[1] The total number of endorsements exceeds the total number of people authorized to teach because licensees may hold more than one endorsement.

[2] The total of 43,353 teachers by subject area, shown above, exceeds the total of about 41,000 teachers discussed elsewhere in the report because individuals may teach in more than one subject area.

[3] Although teachers are reported by districts as teaching in the general middle, junior, and high school areas, endorsements in these general areas are uncommon.

[4] Other includes various areas such as agriculture, industrial arts, and consumer education.

Data on licensee endorsements and teaching subject area are not entirely comparable for a number of reasons. First, a teacher may hold multiple endorsements in different areas and teach in only one. Second, a teacher may provide instruction, at least on a temporary basis, in an area where he or she does not hold an endorsement. Finally, the data on teachers employed in the public schools are from 1999, while the licensing data were current as of

spring 2001. However, Department staff indicated that they would not expect the breakdown of teaching subject areas to change significantly from one year to the next. Despite these differences, we believe our comparison provides a basis to draw general conclusions on teacher supply and demand by subject areas, such as:

- With a few exceptions, there is general consistency in the breakdown of individuals and endorsements among subject areas, indicating that there is not an extreme overabundance of any given endorsement area. For example, the most common endorsement area and teaching area is general pre-school and elementary education, making up roughly 40 percent of both endorsements and teachers.
- The overall ratio of endorsements to teachers is just under two to one, showing that there is a supply of individuals qualified to teach in all areas.
- The only specific area with an endorsement to teacher ratio that approaches one-to-one is math. This may indicate that math specialists are in some demand and that endorsements in this area should be encouraged.
- The single subject area with the greatest ratio differential is special education, where there are more than three endorsements for every teacher. Given the reported shortage of special education teachers, this may reveal that despite intentions of teaching in this area, many licensees do not enter or remain in this teaching field.

The Department could do further analysis with the information it currently has available, such as comparing licensees by endorsement area and address to teaching positions by district to evaluate supply and demand in different geographic areas of the State.

Retirement Information Is Important for Evaluating Teacher Supply and Demand

Compiling information on the age of teachers in the public schools is critical for analyzing teacher supply and demand. We found that the percentage of Colorado's teacher workforce that is approaching retirement is growing. In the 1993-94 school year, about 26 percent of Colorado's public school teachers were over age 50; in 1999 this figure had risen to just over 28 percent. The following table shows teacher age ranges and the predicted number of teachers in each range who will retire next year.

Age Groups of Teachers in Colorado K-12 Public Schools as of 1999 and Estimated Teacher Retirement Next Year			
Age Range	Number and Percent of Teachers in the Age Range	PERA Predicted Retirement Percentage for Next Year	Predicted # of Retirees Next Year (Using PERA Percentages)
Under 50	29,820 (71.9%)	n/a	0
50 to 54	7,645 (18.4%)	16%	1,223
55 to 59	3,080 (7.4%)	18%	554
60 to 64	798 (1.9%)	18%	144
65 to 69	116 (0.3%)	25%	29
70 and above	27 (0.1%)	100%	27
Total	41,486 (100.0%)		1,977
Source: Office of the State Auditor analysis of data from the Department of Education and the Public Employees' Retirement Association of Colorado (PERA).			

In Colorado, teachers may retire as early as age 50. Therefore, although the table predicts that only about 2,000 teachers will retire next year, over 11,000 are currently over age 50 and could theoretically retire at any time.

Teacher Demand Is Growing Nationwide

National statistics indicate that demand for teachers is on the rise and is not expected to abate in the near future. According to the U.S. Department of Education, in the 1998-99 school year there were about 2.8 million teachers employed in public elementary and secondary schools in the United States, and an estimated 2.2 million new teachers will need to be hired over the next ten years to replace those who retire or leave the profession for other reasons.

A 2000 report by the National Governors' Association Center for Best Practices discusses the demand for teachers, stating:

School districts across the country are experiencing shortages of qualified teachers ... Class-size reduction initiatives, high attrition rates among new teachers, and the upcoming retirements of baby boom teachers increase the number of job vacancies ... Surprisingly, ... more individuals are

entering teaching than there are jobs. However, ... only about 60 percent of those trained take teaching jobs [and] 30 to 50 percent of new teachers leave the profession within the first five years.

Many school districts lack qualified teachers in specific subject areas. [While an] oversupply ... occurs in some areas [it] has not been able to satisfy the high demand in others for a variety of reasons, including education schools that do not encourage students to match specialty areas with demand [and] inadequate job placement systems

As the National Governors' Association report suggests, there are various factors that impact teacher supply and demand. Although Colorado schools and school districts make hiring decisions, state laws and regulations provide the guidelines under which those decisions are made. Therefore, it is reasonable for the Department, as the State's K-12 education agency, to examine issues of teacher supply and demand so that management strategies can be developed. The results of such an examination can be used by school districts to develop and direct recruiting efforts; by the Department of Higher Education to plan teacher preparation programs to address the State's needs and help teaching students plan their fields of specialization; and by the Department, the State Board of Education, and the Legislature to make policy decisions.

We found that over 30 other states have some type of teacher supply and demand analysis. Some states' education departments have conducted studies of teacher supply and demand in house, while other states have contracted with outside entities to have studies done. Department staff indicated that they believe an analysis of teacher supply and demand would require additional reporting by school districts and the dedication of additional resources within the Department. However, we believe the Department could start with information currently available to it and, on the basis of the results of preliminary efforts, consider the need for more in depth analysis.

Recommendation No. 3:

The Department of Education should examine and report on the supply and demand for teachers in Colorado. This should include:

- a. Establishing a process to periodically combine and compare staffing and licensing data to identify areas of need for teaching personnel and areas of teaching supply.

- b. Preparing reports for school districts, higher education, the public, and the General Assembly on K-12 educator supply and demand.
- c. Considering the need for commissioning a more formal assessment of supply and demand of K-12 educators in Colorado.

Department of Education Response:

Partially agree. Measuring supply and demand is very difficult (see for example, *Teacher Supply, Demand, and Quality*, National Research Council; 1992). CDE has only some, but not all, the data needed to even begin such an endeavor. We would need a clear mandate in law to collect the data needed. *We would need funding.*

The importance of doing a good study is critical. Whether the study is good or bad, students in planning their futures, recruitment efforts by districts, etc will use it to judge or to approve teacher preparation programs.

Information in School Report Cards Could Be Improved

In 2000 the General Assembly passed legislation requiring the Department of Education to produce an accountability report, generally referred to as a school report card, for every public elementary and secondary school in the State. The purpose of the report cards is to better inform parents and community members about the quality of Colorado schools. By statute, school report cards will include the following information:

- An overall academic performance designation or grade (e.g., A to F). The designations are based on Colorado Student Assessment Program (CSAP) results, which are also included in the report card.
- School staff information such as the number of teachers, administrators, and support staff, salaries, student to teacher ratios, and the level of professional experience of the teachers.

- School safety information including the number of student suspensions, expulsions, and incidents involving drugs and alcohol, as well as whether the school requires uniforms, has a closed campus, or conducts home visits.
- Financial information such as sources of revenue, use of funds, amount of bonded debt, and amount spent on new buildings.

Appendix B shows a sample School Accountability Report.

Because the first accountability reports are not scheduled to be distributed until August 2001, we were not able to examine actual reports. However, in evaluating school district reporting, we did review the report card format and discuss with both Department and school district representatives their concerns about the reports. We identified a number of ways in which the information on the report cards could be improved to provide more complete, accurate, and comparable information to readers.

Report Card Data Are Not Independently Verified

Section 22-7-605(4)(d), C.R.S., requires that school report cards include the following statement:

School Report Cards prepared by the Colorado Department of Education are independently audited and verified by [name of the consulting firm whose services are procured pursuant to section 22-7-606(4)].

We believe this statement is misleading, implying a level of review and verification of the report card data that does not exist. This is because the Department is planning to contract with an independent auditing firm to annually audit the process of preparing the report cards but not the data in the report cards. The request for proposal for the required audit, which was issued in April 2001, stated “No on-site verification of data at the school or district level will be included.” The request also indicated that the auditors are to validate data processing and storage to ensure data and reporting integrity and quality control, and assess whether the calculations and other procedures used to produce the reports are consistent with the intent of the law.

Section 22-7-606(4), C.R.S., states the following:

On or before January 1, 2001, and each January 1 thereafter, the state board [of education] shall contract with a nationally recognized, independent auditing firm to annually audit the process of preparing the report cards developed pursuant

to section 22-7-605 *to ensure data and reporting integrity* and quality control.... The name of the independent auditing firm shall appear on all report cards printed pursuant to this section. (Emphasis added).

Although the review process described in the Department's Request for Proposal will help to ensure that the data in the accountability reports reflect what school districts reported, it will not provide any assurance regarding the accuracy or integrity of the data as reported to the Department. The statutory language above indicates that the integrity of the data, as well as the process, should be ensured.

The purpose of the report cards is to inform interested parties about the quality of education in the public schools, in part to allow parents to make informed choices for their children. However, without verification of reported data, readers have no assurance that the information contained in the report cards is reliable. We recognize that implementing audit procedures for all the data included in the report cards is a major undertaking. However, one option for managing the task would be for school districts to expand the procedures conducted by their independent audit firms to cover report card data. Without such procedures, we believe the report cards should contain a more accurate disclosure indicating that all the information they contain is reported by school districts and is not checked for accuracy by the Department or any other entity.

Report Cards Lack Important Comparative Information

A second concern we noted with the current format and contents of the school accountability reports is that important comparative information is absent. One specific example is that while the report cards indicate the amount of outstanding bonded debt of the district in which the school is located, they do not report the payments against this debt. This omission may give an incomplete picture of the debt situation of the school district.

A broader example is the inconsistent provision of statewide figures for comparison with the individual school. While both state and district-level comparative information is provided for CSAP scores and teacher and administrator salaries, similar data are not included for all sections of the report. Specifically:

- Information on nearby schools is provided for comparison of the overall academic performance designations, but district and statewide averages are not reported.

- District-level figures are reported to allow comparisons of the number of school staff and the professional experience of teachers, but statewide information is not reported.
- Neither district nor statewide data are provided in the student/teacher ratio or safety and school environment areas.

Including more complete information for comparisons would enhance the value of the report cards to parents and the public.

Department managers indicated that expanding the data on the report cards would be beneficial but that the current format, prescribed in statutes, does not permit any additional information or disclosures to be included. However, both the Department's Web site and the Governor's school accountability report web page offer opportunities for publishing data related to the report cards. On the basis of the results of the first distribution of report cards in August 2001, we believe the Department should review the report card to identify any information it believes is not useful, as well as information that should be added. The Department should then develop recommendations to the General Assembly to implement identified changes. In addition, the Department should provide information on its Web site to supplement the report cards.

Recommendation No. 4:

The Department of Education should implement procedures to ensure that the data contained in school accountability reports are accurate and comprehensive. The Department should:

- a. Evaluate options for having data included in the report cards audited. Until audits are conducted, the Department should ensure that readers are notified that all the data are not independently verified for accuracy.
- b. Review the report cards after the first distribution to identify and implement changes in the information included.
- c. Ensure its Web page includes statewide comparative data for all information included in the report cards.

Where necessary, the Department should recommend statutory changes to implement the steps above.

Department of Education Response:

Partially agree. All of the data collections included in the accountability report have multiple edits and are reviewed by district and Department staff for accuracy. School districts' financial data, which serve as a basis for the financial information in the accountability reports, are audited. In addition, the company that administers and scores the CSAP exams has a control process in place to ensure data quality and accuracy.

- a. The statute is very specific that the scope of the audit was to annually audit the process of preparing the accountability reports developed and to ensure data and reporting integrity and quality control. This is the language that was included in the RFP and the scope of work that has been included in the contract.
- b. The Department has always planned to review the accountability reports after distribution and to implement improvements.
- c. The web page has been designed to assist the user to make not only statewide comparisons, but also school-by-school comparisons.

Auditor's Addendum

We agree that the statute is specific in requiring an audit of the process of preparing the report cards. However, we believe the intent of this requirement is also made clear in the statutory language stating that the purpose of the audit is to ensure data and reporting integrity and quality control. A review of the process alone, excluding the underlying data, is inconsistent with the concept of an independent audit as it is commonly understood. Furthermore, the current controls over the report card data, which include audits of school district financial statements, reviews of CSAP results by the Department's contract firm, and reasonableness checks of other data reported by school districts, do not constitute an independent audit of report cards. Therefore, we believe that the statement on the report cards misleads the public.

The Read to Achieve Grant

Chapter 2

Among the most recent major initiatives in the Department of Education is the Read to Achieve grant program, which was created in 2000 with the passage of Senate Bills 71 and 124. The program is structured to competitively award grants to individual schools to fund intensive reading programs. Pupils in the 2nd and 3rd grades, as well as those between the 3rd and 4th grades, whose literacy and reading comprehension skills are below the levels established by the State Board of Education, are eligible to participate in funded programs. Funded activities can include reading academies for intensive reading instruction, after-school literacy programs, summer school clinics, tutoring, and extended-day reading programs.

The program is administered under the direction of the Read to Achieve Board, which consists of 11 members representing education at both the state and local levels, both houses of the General Assembly, and parents of children who may participate in the program. The Read to Achieve Board is responsible for:

- Collecting and reviewing applications for grants.
- Recommending to the State Board of Education the schools that should receive grants as well as the duration and amount of each grant.
- Reporting to the Governor and the General Assembly on the effectiveness of the program by February 1, 2004.

The State Board of Education is responsible for promulgating rules for the grant, including application procedures, criteria for selecting schools and determining grant amounts, and processes to evaluate the success of the programs operated by grant recipients. The Department of Education administers the grant.

By statute, 19 percent of the Tobacco Litigation Settlement Cash Fund is appropriated annually to the Read to Achieve Cash Fund, with a maximum annual appropriation of \$19 million. The following table shows the actual and anticipated funding for the program for the next several years.

Read to Achieve Grant Program	
Actual and Projected Appropriations for Fiscal Years 2001 Through 2003	
Fiscal Year	Actual or Projected Appropriation
2000-2001	(Actual) \$18,999,299 ¹
2001-2002	(Actual) \$17,579,872 ²
2002-2003	(Projected) \$19,952,952 ³
Total	\$56,532,123
Source: Department of Education.	
¹ Includes \$15,045,677 of tobacco revenue and \$3,953,622 of cash funds.	
² Includes \$16,439,397 of tobacco revenue and \$1,140,475 of cash funds.	
³ Includes \$19,000,000 of tobacco revenue and \$952,952 of cash funds.	

The first round of grant applications for Read to Achieve was received by the Department of Education in November 2000. Schools were allowed to request funding for up to three periods. The first funding period covered 18 months, from January 2001 through June 2002, and the remaining two periods covered subsequent fiscal years (2003 and 2004). The Department received 605 applications and awarded grants to 414 schools to provide services to almost 21,000 students. In total, over \$26 million was granted out of more than \$36 million available for the period January 2001 through June 2002, with a statewide average grant per student of about \$1,280.

The following table shows that the regional distribution of grant funds was fairly consistent with the need for funds, as indicated by the number of eligible students. The statute requires the Read to Achieve Board to ensure, to the extent possible, that grants are awarded to schools in a variety of geographic areas of the State.

Distribution of Read to Achieve Funds Among Education Regions First Funding Period (January 2001 - June 2002)				
Region	Grant Awards		Eligible Students	
	Amount	Percent	Number	Percent
Metro	\$15,904,000	59%	20,467	55%
North Central	\$2,910,000	11%	4,897	13%
Northeast	\$394,000	1%	529	2%
Northwest	\$1,738,000	6%	1,667	4%
Pikes Peak	\$2,728,000	10%	4,591	12%
Southeast	\$1,923,000	7%	2,650	7%
Southwest	\$426,000	2%	1,202	3%
West Central	\$941,000	4%	1,573	4%
Total	\$26,964,000	100%	37,576	100%

Source: Office of the State Auditor analysis of data from the Department of Education.
Note: A map of the education regions may be seen on P. 71.

Administration of the Grant Was Designed to Ensure Accountability

One of the main principles of the Read to Achieve program is to ensure accountability for the planned and actual use of the funds. By establishing a competitive grant process, policymakers emphasized the value of distributing funds to schools with well-designed programs that were focused on accomplishing specified objectives. Accountability for Read to Achieve grants has been addressed through a rigorous application and evaluation process and the reporting of program outcomes. The grant applications are scored based on information provided by the schools regarding:

- Student needs.
- Program goals and evaluation mechanisms.
- Planned use of funds to support students and teachers.
- Indicators of success.
- Budget cost-effectiveness and the ability to leverage other funds.

To ensure that the programs achieve intended results, future funding is conditional on schools showing progress in their reading programs. By statute, schools awarded grants in the first period are eligible for funding in subsequent years if they achieve the goals set

forth in their applications and demonstrate that a minimum of 25 percent of the pupils enrolled in the program in the prior year improved their reading skills.

Not All Eligible Students Are Served by the Read to Achieve Program

According to information published by the Governor's Office and the Department, a primary goal of the Read to Achieve program is for "all Colorado students to be proficient readers by the end of the 3rd grade." However, the Read to Achieve program is not structured to provide grants to all schools with students needing assistance in reaching this goal. Because the grant process is competitive, funding is not distributed to schools based on the presence of eligible students.

Using information from the Department of Education on the numbers of 2nd and 3rd graders whose reading comprehension is below the levels established for their grade levels, along with the number of students identified to be served in each proposed grant program, we estimate there are nearly 38,000 students in the State who are eligible to participate in Read to Achieve programs in the first grant period. According to the Department, the 414 schools receiving grants will provide intensive reading programs to nearly 21,000 pupils, or about 55 percent of the eligible students. This means that about 17,000 eligible students will not be served through the first round of grant awards.

Some of these students will have the opportunity to participate in Read to Achieve programs next fiscal year. The Department is currently providing another opportunity for unfunded schools to apply for Read to Achieve grants for the period July 1, 2001, through June 30, 2002. There is a maximum of \$9 million available to be awarded. If this second grant round provides the same average amount per pupil as the first round (about \$1,280), another 7,000 students ($\$9,000,000/\$1,280$) could be served. This will still leave about 10,000 eligible students attending schools without Read to Achieve grants next year.

Grant Awards Varied by School Size and Region

In reviewing the distribution of grant funds to schools, we found that larger schools tended to be more successful in obtaining grant funds than smaller schools. The following table shows that schools with more than 600 students were most successful in obtaining grants, receiving 86 percent of the funding amount they had requested overall. In contrast, the smallest schools, with 200 or fewer students, received less than half the funds they applied for.

Read to Achieve Grant Requests and Awards by School Size First Funding Period (January 2001 - June 2002)			
School Size (Number of Students)	Total Grant Requests	Total Grant Awards	Percent Awarded
200 and below	\$1,378,000	\$659,000	48%
201 - 300	\$3,990,000	\$2,561,000	64%
301 - 400	\$8,219,000	\$5,845,000	71%
401 - 500	\$8,074,000	\$6,620,000	82%
501 - 600	\$6,985,000	\$5,157,000	74%
Over 600	\$7,119,000	\$6,122,000	86%
Unknown	\$62,000	\$0	0%
Total	\$35,827,000	\$26,964,000	75%
Source: Office of the State Auditor analysis of data from the Department of Education.			

This finding is consistent with the comments of some of the readers who participated in the Read to Achieve review process. A number of individuals who reviewed and scored grant applications indicated they believed that small schools lacking professional grant writing capacity were disadvantaged. Some of the specific comments of readers included:

- Could/should small schools have weighted scores? They obviously do not have the grant writing resources, which seems unfair to them.
- These are not competitive grants. We were scoring grant writing abilities rather than funding needs/plans for students.
- Schools with a lot of money who have grant writers will be getting more of the money than the small schools who also really need it but don't have the grant writers.

In addition, of the 18 superintendents we interviewed, many questioned the benefits of the competitive approach, which they characterized as both time-consuming and overly complex.

Furthermore, although grants were distributed among the education regions as shown earlier, there was also some variation in the ability of schools in different regions to acquire Read to Achieve funding. The table below shows that while overall three-quarters of the funds applied for were granted, schools in some regions received a considerably larger percentage of what they had requested than others. Specifically, while schools in the Northwest region received, in total, more than they had applied for, schools in the Southwest region were successful in being granted less than half of their budget request amounts.

Read to Achieve Grant Requests and Awards by Education Region First Funding Period (January 2001 - June 2002)			
Region	Total Grant Requests	Total Grant Awards	Percent Awarded
Metro	\$19,121,000	\$15,904,000	83%
North Central	\$4,268,000	\$2,910,000	68%
Northeast	\$524,000	\$394,000	75%
Northwest	\$1,659,000	\$1,738,000	105%
Pikes Peak	\$3,846,000	\$2,728,000	71%
Southeast	\$3,669,000	\$1,923,000	52%
Southwest	\$932,000	\$426,000	46%
West Central	\$1,808,000	\$941,000	52%
Total	\$35,827,000	\$26,964,000	75%

Source: Office of the State Auditor analysis of data from the Department of Education.
Note: A map of the education regions may be seen on P. 71.

Significant Resources Are Devoted to Administering the Read to Achieve Grant Program

Up to 1 percent of the Read to Achieve Fund, or \$150,000 for Fiscal Year 2001, is available to cover the costs of administering the Read to Achieve program. According to Department records, about \$65,000 of the administrative budget was spent on the first grant round. We roughly estimate the total costs of administering the first round of Read to Achieve grants was actually about \$200,000. This figure includes the expenses of school personnel who participated in reading and scoring applications, but does not include school-incurred costs to prepare their grant requests. The majority of the Department's

costs were paid out of the administration portion of the Read to Achieve grant or were absorbed within the Department's overall budget. Specifically, the Department and schools incurred costs for extensive training and review for the program. For example:

- Department staff offered 10 days of training workshops around the State to inform schools about the grant.
- The Department recruited 138 school volunteers to review and score the grant proposals. Each volunteer received a half-day training, reviewed an average of 17 applications, and met for a full day of discussion and scoring.
- The Department hired two temporary consultants to help schools develop proposals and assist with the overall administration of the grant.

There are two main factors that contribute to the costs of administering the Read to Achieve program. One is the extensive training, application, and review process established by the Department to ensure accountability for the distribution and use of the grant funds. However, the statute itself contains a concrete, measurable accountability standard that must be met for schools to obtain continued funding. This standard is the requirement that at least 25 percent of the students enrolled in any school's Read to Achieve program must improve their reading skills to at least grade level or achieve a proficient score on the CSAP in the year following participation. This requirement helps to ensure that only schools with effective programs will receive ongoing funding, offsetting the need for an exhaustive application process to ensure accountability.

The second factor contributing to the administrative costs of the Read to Achieve program is the structure of the grant program, which is set in statute. Because Read to Achieve is a competitive grant directed to individual schools, the program generates costs at the school and district level for a large number of eligible applicants. Providing the training and oversight common to a competitive grant, particularly for numerous participants, is also costly to the Department.

We believe changing the grant structure to be less competitive and simplifying the application process would reduce costs while promoting accomplishment of the stated goal of helping all students become proficient readers by the end of the 3rd grade.

The Department Should Consider Changes to the Grant Structure

Although the General Assembly, the State Board and Department of Education, and the Read to Achieve Board have taken steps to accomplish the various purposes of the Read

to Achieve program, we believe changes to the current structure would help ensure participation of more eligible students at a potentially lower cost. In evaluating the success of the first grant round, the Department recognizes that not all eligible students are being served by the program and has expressed interest in exploring alternative allocation methods for the grant in the future. Several options that should be considered, which may require some statutory changes, include the following:

- Designating a certain portion of the available funds to various categories of schools, such as small or rural schools. Within each designated portion, eligible schools could compete for the available funds. This would ensure that schools sharing similar characteristics, such as size, location, or economic strength, would compete against each other, rather than against schools in very different circumstances.
- Offering a minimal amount of funding to each school but allowing competitive applications to be submitted to obtain additional resources. This would ensure some funding is available for all students but still encourage schools to develop acceptable programs to do more.
- Distributing funds on a formula basis, with a calculated amount per eligible student being allocated to each school. This would eliminate the time-consuming and expensive application and review process while providing funds to each eligible student.

Accountability for any of these alternatives could be achieved through required reporting of results by school districts with continued funding contingent on student reading improvement.

Department managers are reluctant to change the process after only one or two grant rounds because they believe it would be unfair to schools that successfully competed in the first proposal process. We understand this concern, but believe the issue of providing funds to promote literacy in all schools is critical and the need for change to help all eligible students should not be delayed.

Recommendation No. 5:

The Department of Education should pursue alternatives for administering the Read to Achieve program to ensure distribution to a greater number of eligible students. The Department should consider the following options, which may require some statutory change:

- a. Designating a certain portion of the available funds to various categories of schools, such as small or rural schools, and allowing schools within the categories to compete for the available funds.
- b. Offering a minimal amount of funding to each school but allowing competitive applications to be submitted to obtain additional resources.
- c. Allocating funds on a formula-driven basis to all schools or consortia with eligible students.

The Department should continue to require annual reporting on program outcomes and effectiveness, regardless of any changes in the distribution structure.

Department of Education Response:

Partially agree. The Department agrees that some changes to the administration of the grant should be implemented and CDE and the Read to Achieve Board are directly addressing several of the audit report comments. Currently, CDE is taking proactive steps regarding distribution to a greater number of eligible students in several ways:

1. Meetings have been held with rural superintendents to identify additional means of addressing their needs during future grant distribution (especially targeted at districts with fewer than 200 students). These meetings have been highly productive. Audit Recommendation 5A, which specifies designating a certain amount of funding for the category of small rural districts, is a primary option being considered.
2. Assistance (primarily targeted at small rural districts) during the current grant process has included a step-by-step guide to writing these grants and examples of successful grant components from the last grant review (from both small rural and urban applications) available at all of the 8 regional trainings and on the CDE web site, continued access to timely consultation in planning and writing the application, and regional assistance through a focus on regional center consortium grant option as well as CDE regional team assistance.
3. The Board and CDE are assuring that the Read to Achieve funding efforts are leveraged effectively with other funding sources for making sure students read by the end of third grade, e.g., federal Comprehensive School Reform Demonstration (CSRD), Colorado Reading Excellence Act (CREA), and Title

I School Improvement grants plus expected dramatic increases in federal funds for reading grants. State level - Teacher Development grants.

4. CDE will track schools that have not benefitted from Read to Achieve funds by the beginning of the 2001-2002 school year to (a) make sure they have access to upcoming federal and state grant options and (b) provide additional support through regional teams and Title I assistance.
5. The Read to Achieve Board and CDE will continue to focus on fair distribution of funds across regions in future funding cycles.

However, the Department would disagree with a formula approach on the basis of extensive research regarding formula-driven dollars through the federal Title I program. A majority of these funds have been used to fund literacy over a 20-year period. The critique regarding this program is that dollars have not produced results for students. Data from the program have shown the need to provide accountability on both the front end of funding as well as through analysis of student results. Providing dollars to schools that do not have effective intervention, professional development and parent involvement components in place through a formula-driven mechanism has not worked.

Finally, research on the time necessary to produce change in student performance would support continuation of current funding during the next three years to schools that have met the quality expectations of the grant review. These schools across the state have been notified by the Read to Achieve Board that they were approved for three-year programs contingent on adequate progress.

The Department Should Encourage Development of Consortia for Read to Achieve Grants

The requests for proposals for the Read to Achieve program states that groups of schools are encouraged to apply as a consortium to leverage resources but that each individual school within a consortium must submit an application. Neither the request for proposal materials nor the training provided for the grant elaborated on the definition of a consortium.

In November 2000 the Department received 199 grant proposals from schools applying as consortium members and 406 proposals from schools with individual programs. We compared the number of consortium schools that received funding with the number of schools applying individually that received funding and found that the consortium applicants were somewhat more successful in obtaining Read to Achieve grants. Specifically, 77 percent of the consortium applicants (154 schools) were approved for funding, whereas 64 percent of the individual school applicants (260 schools) were funded. Of the 41 consortia formed, 23 were successful in obtaining funding for all the schools in the consortium, 14 obtained funding for some of the schools, and 4 were not successful in obtaining funding for any of the schools in the consortium.

Although the Department has not analyzed the reasons for the success of the consortium schools, one reason may be that by working together, smaller and more rural schools were able to access more resources or more expertise to prepare their programs and grant proposals. As discussed previously, smaller and more rural schools may be at a disadvantage in successfully competing for grant funds.

Scoring of Consortium Applications Varied

We reviewed over 80 consortium applications and found that schools within 25 of the consortia submitted virtually identical applications. In other words, the applications within each of these consortia appeared to have been copied from one school to the other with only minor changes, such as school name, student numbers, and budget figures; the programs described were the same. We also found that applications that were very similar in content were often scored and funded differently. Although consortium applications were initially reviewed and scored by readers in the same way as individual applications, the Read to Achieve Board then conducted a subsequent review, reassigning scores to address variations and making final funding decisions. However, even after the Board's review, differences in scores remained. For example:

- One consortium with five schools had initial scores of 45 to 60 on a 74-point scale; final scores ranged from 50 to 60 points. All schools in this consortium received some funding.
- Another consortium with five schools had initial and final scores ranging from 24 to 43 points. None of the schools in this consortium were funded.
- One consortium with three schools had initial scores of 48 to 57 and final scores ranging from 45 to 53. Two of the three schools received funding.

- One consortium with eleven schools had initial and final scores ranging from 40 to 59. All but one school in this consortium were funded.

These variations indicate that the evaluation process was not consistent in the scoring of very similar applications. Allowing schools within a consortium to submit a combined application would eliminate the possibility of these types of variances in the future.

Department managers stated that the requirement for schools to submit individual applications was based on interpretation of the statutes. However, Section 22-7-506, C.R.S., refers to schools “apply[ing] jointly” to leverage resources, which appears to allow combined or joint applications for multiple schools within a consortium. We believe the Department should first clearly define a consortium for purposes of the Read to Achieve grant, then develop procedures to permit combined applications. These steps would have several benefits, including:

- Simplifying the application process for schools participating in consortia.
- Reducing the number of applications to be reviewed by readers and the Read to Achieve Board.
- Encouraging the development of true collaborative programs among schools.

Recommendation No. 6:

The Department of Education should improve the application process for consortium applicants in the Read to Achieve program by:

- a. Developing a definition of a consortium for purposes of the Read to Achieve program.
- b. Allowing schools within a consortium to submit one joint application rather than individual proposals.

Department of Education Response:

Agree. CDE and the Read to Achieve Board will clarify the definition of consortium, follow the current 20 consortia applications closely, implement a combined consortium application, and explore the best mechanism for assuring that essential building analysis and planning occurs within the combined framework as this applies to future awards. Individual schools will still need to report results

on meeting the 25% student performance expectation to qualify for continued funding.

Communication Regarding the Read to Achieve Program Could Be Improved

Another area we believe the Department could improve is in its communication with schools regarding the outcomes of the grant process. In particular, written communication with school districts could be tailored to provide more specific feedback to individual applicants.

First, each school awarded a Read to Achieve grant received a letter from the Department regarding the approved funding amount. From reviewing application files and summary data from the Department, we determined that about 40 percent of schools were granted the amount they had budgeted in their proposals. The remaining 60 percent were awarded a different amount than requested, with about half receiving less than budgeted, and half more. Schools that were awarded either more or less than they had requested were not informed, in the award letter, of the reasons for the approved amount. About six weeks after the initial award letters, these schools were sent a form letter with a general explanation that some proposed budgets had been adjusted for one of the following reasons:

- Some schools had incorrectly identified the first budget period by requesting funds for 12 rather than 18 months. These budgets were recalculated by the Department and funds were awarded based on this correction.
- Budgets were reduced to exclude indirect and administrative expenses and to ensure that grants did not exceed \$1,650 per student.

These letters did not specify which, if either, of these situations applied to the individual school receiving the letter, nor did they show the Department's calculations of the approved funding amount. In addition, there were other reasons, which were not communicated in any of the correspondence we reviewed, that schools received a different amount of funding than they had requested. For example, according to notes in the application files, some schools were recommended for reduced funding due to the inclusion in the request of costs that could not be covered by the grant, or the planned provision of services to students outside of the 2nd and 3rd grades.

In addition to the grant award letters, the Department distributed standard feedback forms to each applicant that did not receive a grant. The forms listed each area addressed by the scoring rubric and contained check boxes to indicate which items within each area needed improvement. A minimal amount of explanatory information was included with each form. Overall, the feedback forms did not appear to comprehensively explain the errors or omissions in the application or offer constructive suggestions for preparing future proposals. The Department acknowledged that the feedback provided to Read to Achieve applicants could be improved and has taken steps to address this issue. For example, prior to the second grant round, the Department prepared a guide for writing Read to Achieve grant applications and posted exemplary application components on its web page.

Recommendation No. 7:

The Department of Education should improve its communication with Read to Achieve applicants by:

- a. Developing and disseminating individualized letters to inform each applicant of the reasons for awarding the approved grant amount.
- b. Expanding the written feedback provided to schools to elaborate on specific areas needing improvement and offer constructive suggestions to improve future applications.

Department of Education Response:

Agree. Although individualized feedback was provided to each of the 605 applicants, CDE and the Board will continue to work toward a more effective feedback process. During the current round of funding, the format and thorough analysis provided for the forty Reading Excellence Act grants will be used as a model. This will assure:

1. Adequate clarity regarding program issues
 2. Clear presentation of any budget issues
 3. Consistency of feedback across all applications
 4. Comments that assist next steps
-

The Department Should Establish and Communicate a Standard Process

The Department's administration of the Read to Achieve grant was clearly designed to be comprehensive, objective, and fair to applicants. The Department offered training, hired two temporary consultants to help schools develop proposals, and recruited volunteers from schools around the State to review and score the grant applications. However, the Department can further improve its communication about the grant program and increase consistency in the review process.

The Department initially established and communicated the following standardized grant application, review, and award process:

1. Applications were sent to the Department where they were distributed to voluntary readers for initial review.
2. The Department held a "reading day" for reviewers to meet in teams to discuss and score the applications based on the rubric in the request for proposal. In addition to assigning a team score, the readers recommended funding or denial of each individual application to the Read to Achieve Board.
3. On the basis of the reader scores, the Read to Achieve Board recommended grants to the State Board of Education, which then gave final approval.

However, there appear to have been changes that occurred after the grant applications were submitted and scored that were not anticipated and not communicated to the schools. First, one school district reported to us that it was possible for denied schools to make an informal appeal to the Department after the grants were initially awarded. The Department did not establish and communicate a formal appeals process and Department staff indicated that no applicants formally appealed their status. However, some schools may have essentially had a "second chance" to be awarded funding because, after the initial approval of grants, the Read to Achieve Board conducted subsequent reviews of some denied applications and approved several for funding.

Second, the Board reviewed all the consortium applications to evaluate them collectively and to try to reduce inconsistencies in scoring. According to Department staff, on the basis of this review, the Board decided that some applications should not have been funded. Although the Department ultimately decided not to withdraw any grant that had already been approved, it did inform several schools that their grants were contingent on revising their budgets to address problem areas.

We recognize that Read to Achieve is the first program of this size and nature the Department has administered. The first grant round provided an opportunity for the Department to test approaches and identify methods for improved administration in the future. Department staff indicated that they already plan improvements for the second and subsequent grant rounds. We believe these plans should include standardizing the entire grant process and clearly communicating the process to applicants.

Recommendation No. 8:

The Department of Education should establish and communicate a standardized process for administering the Read to Achieve program. This should include the development of an appeals process, if appropriate, which is communicated to all potential applicants before the beginning of any grant period.

Department of Education Response:

Agree. Further standardization of procedures is being addressed.

CDE and the Board have added an additional process for aligning team results. Each of the teams scoring grants during this round of grant distribution is scoring three identical applications. The external evaluator will adjust scores for each of the team's grants using a statistical procedure for alignment based on these results.

CDE and the Board will include information concerning the appeals procedure for grants within each letter to unsuccessful applicants during the current round of distribution.

Educator Licensing

Chapter 3

The Colorado Educator Licensing Act of 1991 (Section 22-60.5-201, et seq., C.R.S.) authorizes the Department of Education to issue licenses and authorizations to teachers, special services providers (such as school psychologists, counselors, social workers and nurses), administrators, and principals. The specific types of licenses and authorizations issued by the Department are as follows:

- **Provisional License:** This is the standard entry-level license for teachers in Colorado. It is valid for three years and can be renewed indefinitely.
- **Professional License:** This license is obtained after the provisional licensure period, is valid for five years, and is renewable as long as the holder meets ongoing professional development requirements.
- **Master Certification:** This is an optional certification available to professional license holders who meet State Board requirements, including ongoing professional development and excellence in content and performance standards. The master certification is renewable and extends the active period of a professional license to seven years.
- **Alternative License:** This license requires a bachelor's degree from an accredited college or university as well as subject matter knowledge appropriate for teaching in public schools. An alternative license is valid for one year while the holder completes an alternative teacher program at an approved school, district, or higher education institution.
- **Authorization:** An authorization can be issued for a substitute, adjunct, intern, temporary or emergency teaching situation. An authorization gives the holder temporary authority to provide specified services to school districts. All are renewable, except for temporary authorizations.
- **License Endorsements:** Attached to professional and provisional teaching licenses, an endorsement denotes the content area, such as special education, math, or science, in which the holder is specifically trained.

In Fiscal Year 2000 the Department issued over 25,000 licenses and authorizations.

Teaching Licensure Requirements and Process

When applying for a provisional license, individuals must submit to the Department a completed application form, proof of training in an accepted teacher preparation program, college transcripts, an oath and consent form attesting to any criminal convictions other than traffic violations, and a fingerprint card. Staff in the Department's Licensing unit review the materials provided to determine if the individual meets the academic and experience requirements for a license. The fingerprints are sent to the Colorado Bureau of Investigation (CBI) where they are entered into a database to check for arrests in Colorado. The cards are then sent to the Federal Bureau of Investigation (FBI) where the prints are checked in a national database for arrests for federal crimes or for offenses in other states. CBI results are reported back to the Department as quickly as one week after submission; the FBI response can take six weeks or longer.

For applicants who have not disclosed any convictions, and who meet the academic and experience requirements, the Department issues licenses within a few weeks while waiting for the results of the fingerprint check. However, the Department can later revoke the license if necessary. According to Department staff, only one license since 1997 has been revoked under these circumstances. If an arrest or conviction of concern is revealed during the fingerprint check, the Department initiates further investigation of the person and, if warranted, pursues disciplinary action, such as denial or annulment of the license.

In reviewing the Department's educator licensing activities, we identified several areas relating to background investigations that could be improved to ensure that applicants are effectively screened prior to teaching in a Colorado school.

The Department Should Use Additional Resources to Conduct Background Checks

When staff at the Department of Education conduct a criminal history investigation, they use several approaches and resources to ensure they have collected all relevant information on the applicant. In addition to obtaining arrest information from CBI and the FBI, the process typically involves checking a national clearinghouse of disciplinary actions taken against licensed educators, requesting case information from the applicant, and contacting the courts for detailed case dispositions and documentation. In addition, the Department has begun using an Internet site called CoCourts.com for information on case dispositions.

CoCourts.com, which became available in November 2000, is the public access Web site of the State Judicial Department. As a state agency, the Department of Education has free access to the site, which provides information on the status and outcomes of cases in Colorado courts. The Web site simplifies the background investigation process by allowing Department staff to access information for any number of applicants in one location rather than having to contact individual courts.

By collecting information from a variety of sources, the Department gains confidence that it has a complete and reliable file on each case. Individually, each of the systems used by the Department can only provide part of a person's criminal history. For example:

- CBI's database contains primarily arrest records. In some cases a person receives a summons to answer criminal charges rather than being arrested; CBI's fingerprint check will not identify a case where no arrest was made. In addition, CBI has no information about the disposition of most cases.
- CoCourts.com, is the publicly available portion of the Integrated Colorado On-Line Network (ICON), the official electronic courts repository of the Colorado Judicial Branch. CoCourts.com contains much of the same information as ICON but excludes some personal details, such as addresses, as well as dates for upcoming events such as trials and hearings. In addition, the usefulness of CoCourts.com is limited by the fact that searches can only be done by name, unless a court case number is known. Name searches often return numerous and inaccurate results.

Although the Department uses court records to compile files for in-depth investigations, it does not check all applicants against Judicial records. As a result, there is a risk that someone with a criminal record but no arrest record would not be identified by the Department as having a criminal history and could obtain an educator license.

Judicial Records Provide Essential Information for the Department of Education

To assess the completeness of the Department's background investigation process, we requested the Judicial Department to check over 8,500 individuals with licenses granted between July 2000 and January 2001 against the ICON system. ICON contains county and district court records in four major case categories—criminal, civil, traffic, and domestic relations—including cases where a summons was issued but no arrest was made. ICON does not include federal or Denver County court records. The check identified over 700

misdemeanor, felony, and traffic violations, using the social security number, name, and birth date of the applicants. Specifically:

- Sixteen felony cases were identified for violations including theft, possession of illegal substances, menacing, and forgery. Licensing staff reviewed these cases and found that 14 were previously known to the Department. The Department had determined that the nature and age of the crimes did not warrant denial or revocation of licensure. The other two felony cases were not known to the Department prior to our ICON check. The Department has now investigated these cases. For one case, the Department determined that the license should remain in effect; for the other, the Department is pursuing disciplinary action such as suspension or revocation of the license.
- The remaining cases were misdemeanor and traffic offenses including driving under the influence, driving while ability impaired, assault, providing alcohol to a person under 21, child abuse with injury and neglect, false reporting to law enforcement, and possession of controlled substances. Having knowledge of these cases allows the Department to identify patterns that could put children at risk and that might lead to an action against the license.

Although Department staff indicated that checking all applicants against Judicial records is valuable, they believe current resources are not sufficient to do so. Checking each application would require typing each applicant's name and/or court case number into CoCourts.com. However, an alternative would be for the Department to work with Judicial to have batches of license applicant information matched with ICON on a regular basis. This approach would allow licensees to be checked by social security number and birth date as well as name. Furthermore, a batch comparison would ensure that all licenses issued or renewed during the year would be checked against Judicial records, providing an efficient way for the Department of Education to investigate all license holders more completely than is currently being done.

Recommendation No. 9:

The Department of Education should increase its use of Judicial Department records in conducting background checks of license applicants. The Department should work with the Judicial Department to establish a system to have applicant information compared with ICON records in periodic batches.

Department of Education Response:

Agree. The Department concurs that access to ICON would be beneficial in augmenting its investigation processes. The Department will seek the cooperation of the Judicial Department to establish a system to compare its licensing records to the ICON database on a regular basis. The Department will attempt to negotiate with the Judicial Department to access records every month and to have immediate modem access to ICON files to monitor active cases that are moving through the court system.

Statutes Governing Background Checks Could Be Strengthened

Section 22-60.5-105, C.R.S., indicates that the Department of Education is responsible for determining the moral qualifications of applicants for educator licenses. This determination is made based on self-disclosure of criminal convictions by applicants, results of fingerprint checks, and further investigation by the Department, as necessary. As noted above, it appears that the Department's background investigation procedures are thorough. However, we found the Department's statutory authority and responsibility for conducting background investigations and issuing educator licenses are less than comprehensive. We identified several weaknesses in the statutes that could reduce the Department's ability to identify and deny license applicants who may pose a threat to children. Specifically:

- The statutes permit, but do not mandate, the denial, suspension, or revocation of an educator license because an individual has committed or has a pattern of committing any particular crime.
- The statutes do not specifically include general crimes of violence or domestic violence as offenses for which the State Board of Education is permitted to deny, suspend, or revoke a license.
- The statutes prohibit the Department of Education from denying, suspending, or revoking an educator license based solely on an individual's conviction of a felony or other offense of moral turpitude, although the Department may consider such conviction in determining an applicant's moral qualifications for licensure.

- The statutes do not define school-aged children in the public schools as “vulnerable persons” who need protection because of their age.
- The statutes do not give the Department the specific authority to conduct criminal background investigations of educator license applicants as deemed necessary.

Department of Education Statutes Do Not Align With Those of Other Agencies

The shortcomings in the Department of Education’s statutes are noticeable, in part, when compared with other agencies that directly deal with, or license others to deal with, children. The following table compares the statutes pertaining to the Department of Education with those relating to various functions within the State Department of Human Services, including Child Care Licensing. The table shows that statutes pertaining to the Department of Education generally contain less specificity than statutes for other agencies that employ or license individuals dealing with children.

Comparison of Background Investigation and Licensing Statutes	
Education	Human Services (including Child Care Licensing)
Reasons for denial of licensure or employment:	
<p>Section 22-60.5-107, C.R.S., <i>allows</i> the Department to deny, suspend, or revoke an educator license if the holder has been determined mentally incompetent or has been convicted of any of the following:</p> <ul style="list-style-type: none"> • Felony child abuse. • Sexual assault, including enticement of a child and incest. • Contributing to the delinquency of a minor. • Child prostitution or pornography. • Sale of controlled substances. • A felony offense in another state which is similar to the crimes above. 	<p>Section 26-6-104, C.R.S., <i>prohibits</i> the issuance of a license to operate any type of child care facility to an applicant convicted of any of the following crimes:</p> <ul style="list-style-type: none"> • Felony child abuse. • Sexual assault. • A crime of violence. • Domestic violence. • A felony offense in another state which is similar to the crimes above. <p>Section 27-1-110, C.R.S., <i>prohibits</i> the Department from employing an individual in a position involving direct contact with vulnerable persons if he or she has ever been convicted of the crimes above, except domestic violence, and disqualifies a person from employment with the Department if fewer than 10 years have passed since the discharge of a sentence for:</p> <ul style="list-style-type: none"> • 3rd degree assault. • A misdemeanor involving domestic violence, child abuse, or certain types of sexual assault. • Violation of a restraining order.
Definition of populations served as vulnerable:	
<p>No statute containing language that defines children as "vulnerable."</p>	<p>Section 27-1-110, C.R.S., defines a vulnerable person as any individual served by the Department of Human Services who is susceptible to abuse or mistreatment because of his or her circumstances, including age.</p>
Ability to deny a license or employment based solely on criminal history:	
<p>Section 22-60.5-105, C.R.S., requires the Department to be guided by Section 24-5-101, C.R.S., which states that, except for those employed in positions involving direct contact with vulnerable persons, conviction of a felony or other offense of moral turpitude shall not, in and of itself, prevent a person from receiving a license to engage in any occupation or profession.</p>	<p>Section 27-1-110, C.R.S., allows personnel in positions of direct contact with vulnerable persons to be denied licensure or employment based solely on their criminal backgrounds.</p>
<p>Source: Office of the State Auditor analysis of statutes.</p>	

Changes in Statutes Could Help Ensure Consistency in Licensing Decisions

The State Board of Education denies, suspends, and revokes licenses for a wide variety of reasons. According to the State Board's monthly newsletter, since 1997, action has been taken on licenses for reasons ranging from physical violence, such as assault, murder, and child abuse, to nonviolent illegal activities such as the sale and manufacture of illegal substances, theft, bribery, and professional gambling, to lawful but unethical behavior. The Department and the State Board have taken several steps to promote consistency in licensing decisions. First, decisions regarding revocation, denial, suspension, or annulment of a license based on the background of an individual are made after going through four levels of review. Any potential negative licensing action is considered by the Licensing Unit Manager, the Assistant Commissioner for Professional Services, the Commissioner of Education, and the State Board of Education. Second, the State Board has established rules that define specific standards for professional incompetence and unethical behavior, which may be grounds for denial of a license. These include:

- Failure to make a reasonable effort to protect a student from conditions harmful to health and safety.
- Providing professional services in a discriminatory manner.
- Failure to keep in confidence information obtained in the course of professional services.
- Deliberately distorting or suppressing curricular materials or educational information.
- Falsifying or misrepresenting records or facts.
- Making false or malicious statements about students or school personnel.

Furthermore, in practice, the Department has identified offenses that virtually always result in action on a license. For example, staff report that they will not recommend licensing someone convicted of child abuse.

In trying to balance the protection of children with the educator needs of the school districts in the State, the State Board and the Department carefully investigate and deliberate each case relating to educator licensure. We reviewed 80 files of licenses issued

in the past several years and found no evidence in these files of a license being issued to an individual who appeared to have an inappropriate criminal background.

However, the latitude afforded the State Board of Education regarding licensing decisions poses increased risks that someone with a potentially dangerous history could obtain a license. Opinions of what behavior is and is not acceptable for an educator licensee may vary among different Department staff and different State Board members and may change over time. If unacceptable criminal offenses are not clearly delineated in statutes and regulations, individuals with similar criminal backgrounds may be treated differently. In addition, because the State Board does not have standard, documented criteria in law or rule to support its decisions, there may be a greater possibility that an individual could successfully challenge a denial or revocation. Establishing in law the specific offenses that will definitively cause a license to be denied, suspended, or revoked would provide added assurance to the Department and the public that inappropriate persons are not licensed.

Recommendation No. 10:

The Department of Education should propose legislation to strengthen current licensing laws to clarify what offenses will prohibit a person from obtaining an educator license and what populations are being protected. This should include:

- a. Specifying in statute what offenses will result in mandatory denial, revocation, or suspension of a license. This list would be similar in content to that contained in Section 26-6-104, C.R.S.
- b. Maintaining latitude for the State Board of Education to decide on offenses that do not fall into the aforementioned list.
- c. Adding to the statutes a definition of the population the Department is protecting, and identifying this population as vulnerable.

Department of Education Response:

Partially agree. The Department concurs that a review of the legislation regarding grounds for disciplinary action of licensed educators and license applicants could be beneficial particularly in removing some of the ambiguities that have evolved over time. The Department would discourage any legislation that would limit the discretion of the elected State Board of Education in its consideration of disciplinary actions.

Language Should Be Added to Close Loopholes in Department Laws

Although the Department has various methods of learning about the criminal activities of educator license applicants or holders, as previously described, the Department's statutory authority to conduct background investigations is limited. Section 22-60.5-103, C.R.S., requires the Department to conduct fingerprint checks on individuals making an initial application for a provisional license or authorization. However, this is the only specific authorization given the Department to investigate the background of a license applicant or holder. We noted two areas of concern with the Department's current statutory authority in this area.

First, there are circumstances under which the statutes allow a person to obtain a license without undergoing a fingerprint check. These circumstances occur when a person applies for a professional license without having first held a provisional license, because statutes specifically exclude professional license applicants from the fingerprint requirement. For example, applicants from out of state who meet academic and experience requirements and show three continuous years of evaluated experience may obtain a professional license. In addition, the Department can issue a professional license to a person who is certified by a national education foundation. Neither of these situations requires the applicant to have previously held a Colorado provisional license, which would have involved a fingerprint check. Department staff indicated they do not know the number of licenses granted under any of the circumstances listed above.

Second, there is a risk that a license holder can commit a crime that is not brought to the attention of the Department. CBI offers one mechanism for the Department to learn of crimes committed by licensed educators. Once an educator has had a fingerprint check, the individual is flagged in CBI's database and the Bureau notifies the Department whenever such an individual is arrested in Colorado. However, this mechanism is not all-inclusive. One reason is that educators licensed before 1991, when the fingerprint requirement was enacted, have never undergone fingerprint checks and therefore are not flagged in CBI's files. If these educators commit a crime, CBI is not aware that they should be reported to the Department. In addition, CBI only has information on arrests in Colorado, so it cannot inform the Department of crimes committed by Colorado licensees in other states. Because the Department has no statutory authority to check fingerprints after an individual has initially been licensed, the Department is hindered in investigating any possible criminal activities of educators after they are licensed.

Recommendation No. 11:

The Department of Education should propose statutory changes to strengthen its authority to conduct background investigations of educator license applicants and holders. The proposed modifications should add language giving the Department specific authority to:

- a. Conduct complete background investigations on license applicants, rather than just having fingerprint checks performed.
- b. Conduct background checks on license holders as deemed necessary rather than only when applicants are seeking an initial provisional license or authorization.

Department of Education Response:

Agree. The Department concurs with recommendation 11(a). While current practice is to conduct a background check after receiving a fingerprint card, the statutes may not specifically authorize the Department to proceed with the necessary background check and take appropriate action. The Department has relied on 22-60.5-103 (4), C.R.S. as its statutory authority to submit and review returned results of CBI and FBI checks, and pursue appropriate disciplinary action.

The Department concurs with recommendation 11(b). Educators who have previously been fingerprinted and are on file at CBI as clients of the Department of Education are “flagged” to enable the CBI to immediately notify the Department if a new offense has occurred. This notification would occur if CBI were notified by local law enforcement of an arrest. However, offenses committed in other states would not be reported to the CBI and would remain undetected by the Department. This would hold true for educators who had placed their licenses on hold as well as any educator with a current or expired license or authorization. Obtaining knowledge of offenses committed in other states could only occur with subsequent or periodic fingerprint checks processed through the FBI. The Department should be authorized to require an educator to submit a new fingerprint card for good cause if the Department reasonably believes the educator may have been involved in recent criminal activity.

Storage of Educator Licensing Data Could Be Improved

The Department of Education is designated as the sole agency authorized to issue licenses to teachers, special services providers, administrators, and principals. In fulfilling this responsibility, the Department collects, maintains, and disseminates data on applicants. For example, the Licensing unit:

- Receives applications and related supporting information, which are maintained on microfilm.
- Receives reports from school districts on illegal or unethical behavior of staff.
- Informs districts of Board actions on licenses.
- Enters and maintains license information in a computer database.
- Updates districts on the status of applicant licenses.

We identified several areas where the Department could improve the efficiency and effectiveness of some of its data management efforts.

The Licensing unit maintains licensing records on two separate filing systems. One system is an electronic database that stores information on all the license applications since 1988. For each applicant this includes the name, social security number, and last reported address, as well as the license number and type, if a license is granted. If the application is denied, this is also noted in the database. Staff update the computer database regularly to reflect actions taken, such as license denial, revocation, expiration, or renewal.

The other system, a microfilm library, stores copies of all application documents such as the application form and transcripts. The Department currently maintains an estimated 500,000 individual license records, or over 5 million pages, on microfilm. To access any record, staff must search the computer database for the license number, locate the corresponding roll of microfilm, and scroll through it to find the application and materials, which can then be printed out. Currently application files are kept in hard copy for several weeks, then sent in batches to be microfilmed. These two data maintenance systems are not integrated.

New Technology Is Available to the Department

The Department has begun to look into a new database that would convert paper documents to digital media. This would be done by scanning papers, such as licenses and applications, into an electronic database for storage and retrieval. The system under consideration would provide the Department with increased efficiency in several different areas. These include:

- **Time and Labor Savings.** According to Department staff, it can take up to six weeks to have a batch of applications transferred to microfilm. During the time records are being microfilmed they are available to the Department only by requesting copies from the microfilm center. By scanning documents rather than microfilming them, the Department would have almost continual access to the documents. Also, the time required for staff to access information in the future would be reduced because the new system would allow direct access via the computer system rather than by means of microfilm records.
- **Increased Confidentiality.** Department staff believe that files contained in the electronic database would be safer from tampering and misuse than those currently stored on microfilm. The new system being considered by the Department would provide several levels of clearance to protect sensitive files, such as investigations, from unauthorized access. This would replace the current Department security procedure for protecting these files, which involves keeping the microfilm locked in a file cabinet in the Unit Manager's office.
- **Improved Data Management and Retrieval.** According to Department staff, the new system would allow for faster and better data searches, not only by license number but by a variety of other key words or phrases such as address or school name. For example, the Department could search for "Colorado State University" to retrieve all records of licensees who attended that University. Department staff indicated that this type of search would result in more efficient data retrieval than is currently possible.

A Scanning System Could Reduce Licensing Unit Costs

The Department has obtained an estimate from one firm that offers a scanning system that may meet the Department's needs. The estimate includes leased hardware, new software, and system support for a first-year cost of about \$10,000 and subsequent years' expenditures of under \$2,500 for ongoing support and maintenance. Department management indicated that the cost for the system can be absorbed in the Licensing unit's

budget. This system would eliminate microfilm charges, which total about \$15,000 annually, according to Department records, resulting in savings of over \$10,000 annually after the first year. The scanning system would not replace the current computer system but would be linked to allow concurrent updating any time an entry or change is made to either system. This feature would eliminate any duplicate data entry.

Recommendation No. 12:

The Department of Education should pursue efforts to improve data management and retrieval in the Licensing unit, using a new scanning system. The Department should ensure that any new system addresses all its data collection, storage, and retrieval needs and eliminates redundancy. The Department should also consider features that would allow comparison of information in the licensing system to human resource data collected and maintained by the Research and Evaluation unit.

Department of Education Response:

Agree. The Department concurs with the recommendation. Implementation of the system described will be contingent upon finding a qualified contractor with available equipment and expertise and the ability of the Department's Information Management Systems Unit to devote the time and resources necessary to resolve compatibility issues between the new scanning system and the Department's current data system.

District Access to Applicant Information Should Be Streamlined

Portions of the Department's electronic licensing database are currently accessible to school districts via modem. Districts can check the database when they are considering hiring personnel to determine whether an individual's license is current or whether any reports of unlawful behavior by licensed or nonlicensed staff have been filed with the Department. School districts are required by law to report any illegal behavior involving licensed or nonlicensed staff to the Department. For nonlicensed employees, information is provided primarily by school districts. For licensed personnel, however, information also comes from the licensing process, including the Department's background checks. Unlawful incidents that must be reported for both licensed and nonlicensed individuals

include convictions or allegations of unlawful behavior involving a child, unlawful sexual behavior, abuse or neglect in an official capacity, and unethical behavior.

When school district personnel check the Department's database for information on a licensed individual, they type in a social security number. If there is a problem with the license which the Department is authorized to disclose to school districts, a message reading "CALL CDE" appears in the background check field. For example, if an educator has a denied, suspended, or revoked license, the "CALL CDE" message appears. The district must then call the Department's security hotline and leave a message on an answering machine inquiring about the license. Department staff check the message machine daily, look up the status for all inquiries, and get back in touch with the school district to provide information on the license status. This typically occurs within 24 hours of the initial call from the school district.

Expanded Access Would Increase the Efficiency of District Hiring Efforts

Currently school districts cannot get real-time information about applicants who may have problems with their licenses. Instead, they must wait up to 24 hours for the Department to return their call. School districts do not want to risk hiring an applicant without obtaining relevant information concerning the individual's fitness to hold a license. Having immediate access to information on license denials, suspensions, and revocations would help streamline the hiring efforts of school districts.

In addition, both school districts and the Licensing unit would save time if districts could avoid calling the Department and determine directly from the database if an individual has a denied, revoked, or suspended license. The Licensing unit's security hotline log indicates that staff responded to more than 1,300 requests for information between February 2000 and February 2001. On the basis of information from the Department, we estimate that this amounts to approximately 150 hours of staff time per year spent on answering requests of this nature.

One reason the Department receives so many phone calls regarding educator licenses is that some school districts do not use the Licensing unit's database. In the hotline log, we noted several districts that either faxed or called in all their requests for licensing status information. Department staff stated that some districts do not have the software to easily access the database by modem. To address this issue, the Department is developing plans to make license status information available over the Internet. However, these efforts are currently in the early stages and no firm timelines for the project have been developed.

Department staff report that the main benefit of the current call-back system is that Licensing staff can protect confidentiality by ensuring they release information only to the appropriate people. However, the Department already provides information on license denials, revocations, and suspensions to all school districts by sending school superintendents a list every year of all the actions ever taken on any educator license. Providing the same information through its database would streamline the process without compromising confidentiality.

Recommendation No. 13:

The Department of Education should expand the system available to districts to check the license status of potential employees. The Department should modify the licensing database to indicate whether final action, such as denial, suspension, or revocation of a license, has occurred. In addition, the Department should pursue efforts to make licensing data available to school districts through the Internet.

Department of Education Response:

Agree. The Department believes that its current system of returning calls to school districts making inquiries is an efficient process that meets both the needs of the requesting school district as well as the Department. The benefits of conversations that occur between Department staff and school district hiring personnel cannot be totally replaced by a cryptic notation on a computer screen. The Department agrees the modem technology in use is antiquated and could be enhanced considerably by use of controlled website access. The Department further concurs that the information concerning final disposition of cases by the State Board should be posted and available to school districts electronically by accessing the licensing database.

The Department Should Improve School District Reporting of Unlawful Incidents

Statutes require that all school districts report to the Department of Education the occurrence of any unlawful incidents that involve district staff, both licensed and non-licensed. Specifically:

- Section 19-3-308, C.R.S., requires districts to report to the Department any information they receive from social services or law enforcement agencies regarding an employee's involvement in unlawful behavior toward a child.
- Section 22-32-109.7, C.R.S., requires districts to notify the Department of any district employee who is dismissed or resigns due to an allegation of unlawful behavior involving a child, including unlawful sexual behavior, which is supported by a preponderance of the evidence. In addition, districts must report to the Department whenever they learn that a current or past employee of the school district has been convicted of, pled nolo contendere to, or has received a deferred sentence or deferred prosecution for a felony or a misdemeanor crime involving unlawful sexual behavior or unlawful behavior involving children.

In support of these statutes, State Board of Education rules require school districts to report to the Department any dismissals or resignations resulting from convictions for crimes that may cause license suspension, denial, or revocation. In addition, school districts must report employees who the district board of education reasonably believes are guilty of unethical behavior as defined in the State Board rules. The Department investigates any reported illegal or unethical behavior to determine if action such as suspension or revocation of a license is needed.

Incident Reporting Varies Among School Districts

School district reporting of staff incidents is variable in format and content. Currently districts fulfill the requirement to report unlawful and unethical incidents by writing letters to or calling the Department. We reviewed letters and documentation of the 11 incidents reported to the Department during Fiscal Year 2000. We found that all of the reports contained the name of the teacher, the name of the district, and general information on the charge and outcome of the incident. Otherwise, the detail in the reports varied considerably. For example:

- Only one letter included the name of the school where the teacher was employed.
- Five letters included detailed information about the incidents being reported, such as the timing and chain of events surrounding the incident.
- Two letters specifically cited the statute that required the report.
- Three of the notifications were provided via phone calls from the districts and eight were by means of letters addressed to four different people in the Department.

Overall, most of the letters left out at least some information that is crucial to the Department for pursuing action on the license, such as the employee's social security number and most current address and the location of the offense. None of the letters contained the license number of the teacher in question.

Department staff indicated that each year they learn of a number of incidents involving the unlawful or unethical behavior of school district personnel through newspapers or calls from concerned citizens, rather than from reporting by school districts. Although the Department does not know the full number of incidents that go unreported, they recognize that reporting could be improved. In addition, this lack of standard reporting makes it more difficult for the Department to compile and use the data as needed to follow up on cases. The Department could improve the reliability and completeness of reporting by creating a uniform method for districts to report required information, such as a standard form identifying all the data elements needed on each reported incident. The use of standardized forms would simplify the process for districts.

Recommendation No. 14:

The Department of Education should develop and distribute a standard form for school districts to report incidents of staff involved in unlawful or unethical behavior. The Department should design the form to ensure all necessary information is included, such as licensee name, date of birth, social security number, license number, school name, district name and contact person, and sufficient information about the incident so that the Department is able to determine appropriate action.

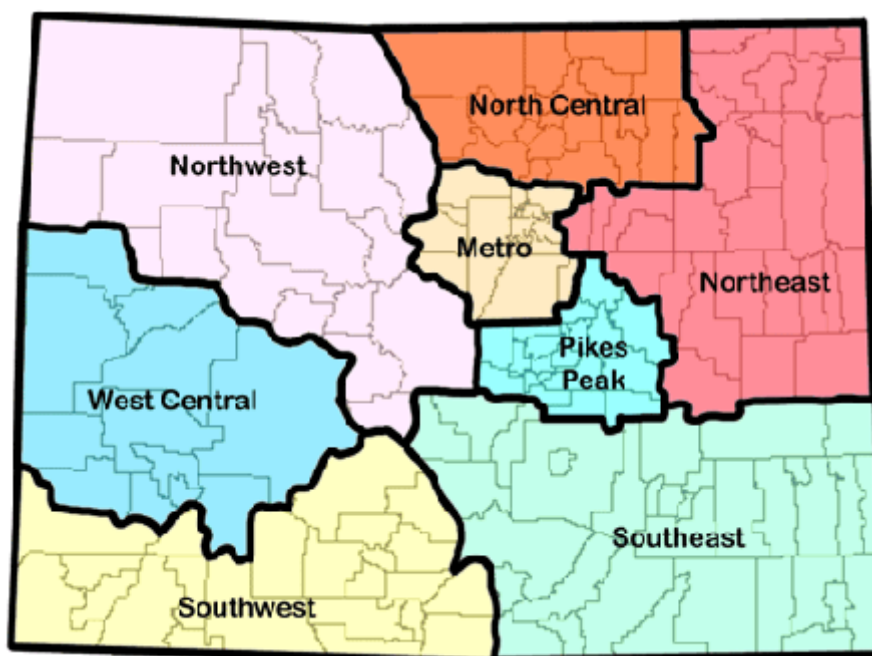
Department of Education Response:

Agree. The Department concurs with the recommendation.

Regionalization

Chapter 4

The Department's Regional Education Services Unit was established to provide assistance and support to school districts in achieving educational goals. In 1999 the Department expanded its regional service efforts by establishing eight regional service teams to represent the education regions shown in the map below.



The Department's eight regional service teams consist of staff located primarily at the Department of Education. Each region has a "core team" composed of a team manager and a regional coordinator, as well as specialists in various areas such as special education, literacy, English Language Acquisition, and professional development. Some specialists within the Department are assigned to one education region while others are assigned to multiple regions. Appendix C contains a matrix of the regional service team members. In Fiscal Year 2001 the total budget for the regional service unit was nearly \$1.2 million.

Developing an organization that is responsive to the varying and unique needs of the school districts in different regions is beneficial to improving education across the State. We interviewed superintendents and administrators in 18 districts within six of the educational regions. All of the school district representatives indicated that the regional service team managers provide needed assistance with Accreditation Contracts and serve as communication links to help districts stay informed of developments in the Department. However, over half the districts we contacted reported that while the regional team managers are helpful, the regionalization approach overall has not resulted in any noticeable increase in assistance or services from the Department. There was also a great deal of concern over the fact that the majority of districts had contact with only the team manager.

We identified several steps the Department could take to improve its approach to regionalization and help ensure that desired outcomes are achieved.

The Department Has Not Established Specific Objectives for the Regional Teams

The Department has established an overarching goal for the regional service teams of improving academic achievement across the State. In addition, team managers indicated that they are generally expected to promote efficiency and help school districts get their Accreditation Contracts approved. However, the Department has not developed specific objectives to support the broad goal of the regional teams, nor has it clearly defined the teams' role in accomplishing this purpose. As a result, each team is left to determine how to improve academic achievement in its region, and services are provided on an ad hoc, rather than a planned, basis. The services offered and the manner in which these services are delivered appear to vary based on the perspective and dedication of the individual team manager, with some teams being more active in their regions than others. For example, according to team managers and members we spoke with, some teams concentrate on actively helping districts align their curriculum to state standards and focus their professional development efforts. Other teams serve more as information conduits by responding to questions and keeping districts informed of new developments and practices. Although variations in the services provided to each region may be appropriate, the variations should be driven by regional needs, not team capabilities or interests.

The Staffing of the Regional Service Teams May Not Reflect Regional Needs

The assignment of staff to regional teams could be improved to reflect the needs of the regions. The current staffing of the teams is variable, but not always based on regional needs. For example, a number of English Language Acquisition specialists and a Prevention Initiatives specialist were assigned to the Northeast region, where the population of students requiring this type of assistance was significantly less than in other areas, such as the Metro region. In addition, according to some team managers, some Department staff are assigned to a regional team simply to be involved in the regionalization effort, not because their expertise is particularly needed by districts in the region.

The school districts we contacted noted several concerns with the regional service teams, including the following:

- Districts originally expected that having a regional team assigned to them meant that they would have increased contact with Department staff whose primary responsibilities would be to address regional issues. However, except for the core team, team members have a primary obligation to the unit they represent rather than to the regional team, so they have not developed particular familiarity with issues in their regions.
- There has been a loss within the Department of subject area specialists because individuals who had served as statewide experts in the past are now assigned to teams. For example, some subject area specialists also serve as regional coordinators and must carry out duties in both areas.
- Districts report increased difficulty in reaching Department staff directly. Because of their participation on the regional teams, some staff spend more time traveling to the regions than in the past, reducing their availability to all other districts.

We believe the Department could address the concerns of the districts by establishing specific, measurable objectives for the teams; defining the roles of the teams in improving student achievement; and clearly communicating the structure and staffing of the teams.

Recommendation No. 15:

The Department of Education should clearly define and communicate the roles, services, and resources of its regional approach. This should include:

- a. Conducting a needs assessment for each region, including input from districts in the region. This should identify the specific expertise requirements for each service team and how the service teams will address the needs of their region.
- b. Developing specific objectives for the regional service teams. There should be some consistency in the goals and objectives across all of the teams but also individual goals and objectives to reflect needs in each region.
- c. Accurately communicating the roles, objectives, and staff resources for each team to schools districts they serve and to the public.

Department of Education Response:

Agree. References to the overall purposes of regionalization are correct. It may be, however, that conclusions of the auditors contain a margin of error in that the 18 districts used in the interviews represent 10% of Colorado's 178 districts, and two of the eight regions are not represented. Nevertheless, many of the recommendations in the report point to ways to strengthen Department services and center on recognized needs, most of which are being addressed. It can be anticipated that by the end of the 2001-2002 school year an audit report will demonstrate increased value and accomplishment of regionalization.

- a. A brief questionnaire was sent to all superintendents in January 2001 seeking input regarding strengths and weaknesses of CDE's regionalization. Responses were sparse but paralleled to a degree some of the comments in the audit. As the 2001-2002 school year begins, the Regional Services Unit will conduct an in-depth survey of needs of each district in each of the eight regions. Results will be used to more precisely tailor regional services to each district. Also, roles of all participants in regionalization will be reviewed and clarified. All of these staff members are readily available via telephone, cell phone, and e-mail.
- b. The basic purposes of regional service teams are clear in support of CDE's primary objectives. These are well articulated in several publications including

CDE's "Consolidated State Performance Report for State Formula Grant Programs." However, individual goals and objectives for each region will be clarified and supported by clear, focused action plans.

- c. This recommendation will be accommodated as a basic component of the action plan referred to in 15 b.

The Department Needs Mechanisms to Evaluate the Regional Approach

As mentioned previously, the main goal of the Regional Service Teams is to improve academic achievement. Regional managers have indicated that Colorado Student Assessment Program (CSAP) data will be used to measure the level of achievement in the regions. However, CSAP scores are a very indirect way of measuring regional team effectiveness. Multiple factors, including individual school and district efforts, activities of the Regional Assistance Centers, and programs such as Read to Achieve, may contribute to an increase in CSAP scores in a particular region. Due to the number of variables impacting scores, their value as a tool to evaluate the regional teams is uncertain. For example, districts within a particular region could have high CSAP scores that are in no way the result of regional team efforts. Conversely, a region could have low scores, even though the regional team provided valuable services.

Aside from the CSAP scores, the only method used by the Department to evaluate the regional team effort is the performance planning and assessment process for regional team managers and coordinators. This process sets and measures very broad goals, which are agreed to between the managers and coordinators and their supervisors. Examples of goals set for some of the regional managers include the following:

- Assisting all schools in the region to increase and sustain academic achievement through ensuring tight alignment among standards of achievement, effective classroom instruction, and utilization of well-defined assessment practices.
- Quality staff development related to measurable goal number one (increased academic achievement) will occur in the region.
- School achievement will have improved in more than 80 percent of the schools in the region.

Although these goals are consistent with the overall intent of the regional service teams, they do not include specific, measurable components.

Because the Department has not developed a mechanism to assess the regional service team effort as a whole, the Department cannot determine if the \$1.2 million and 16 FTE allocated to the teams are being used efficiently. There is no formalized way for the Department to assess how beneficial the regional teams are or whether districts across the State are receiving an increased level of service. In addition, the Department does not have a means for ascertaining whether there are areas that need improvement or identifying best practices among the regional service teams.

The Department generally believes that the regional approach is working quite well; however, all the districts we interviewed indicated that the quality of services provided by the Department has not improved with regionalization. Without a formalized evaluation process, it is difficult for the Department to determine if the intent of the regional approach is being accomplished.

Recommendation No. 16:

The Department of Education should establish formal mechanisms to evaluate the regional service teams and the regionalization effort. The evaluation mechanisms should:

- a. Be based on established goals and objectives.
- b. Include specific details of the activities and services that the regional teams provide in the region that they are serving.
- c. Include input and feedback from the school districts in the region.

Department of Education Response:

Agree.

- a. Formal evaluation mechanisms currently include Regional Services Unit meetings for sharing data, experiences, problems, and responses. These discussions relate to the Unit's goals and objectives. Additionally, the action plans (see 15 b.) for 2001-2002 will respond pointedly to this recommendation.

- b. Not only will the action plans (see 15 b.) respond to this recommendation for details regarding activities and services, they will also include specification of results.
- c. The action plans (see 15 b.) will be based in part on input and feedback from districts and on steps to be taken to fulfill CDE's basic objectives.

Regional Assistance Centers

A second element in the Department's effort to implement a regional approach to education is the establishment of the Colorado Coordinated Professional Development and Technical Assistance Grant program. Prior to Fiscal Year 2000 the Department's approach to providing professional development was to offer direct services such as workshops and to make grants to school districts and Boards of Cooperative Educational Services (BOCES). According to the Department, there was a general concern across the State from small and rural districts that the majority of the development activities being offered by the Department were concentrated in the Front Range area. In an effort to address this concern, the new grant program, initiated in 1999, encouraged the development of Regional Assistance Centers to provide professional development and technical assistance to school districts throughout the State. Each center includes BOCES, schools (including charter schools), school districts, and institutions of higher education. Private schools may also be included.

The Colorado Coordinated Professional Development and Technical Assistance grant is composed of six federal sources and state Gifted and Talented money. In Fiscal Year 2000 the Department distributed a total of \$3.9 million to eight Regional Assistance Centers for the first year of funding. A total of almost \$4.8 million was distributed in Fiscal Year 2001.

Administrative structures for the Regional Assistance Centers vary from region to region. The majority of centers have a governing board that solicits input from advisory committees made up of representatives of the participating members. In some centers, BOCES provide financial and administrative oversight. The services offered also vary and include establishing networks of literacy coaches, offering training seminars and workshops for educators, distributing subgrants to districts, and providing material resources to schools.

The Department Should Consider Options for Providing Professional Development Assistance to School Districts

The Department established a number of parameters to limit how funds were distributed and to encourage cooperative efforts among various educational organizations in the Regional Assistance Centers. For example, the request for proposal for the Professional Development and Technical Assistance grant stated that:

- Applications would only be accepted from consortia serving the educational regions established by the Department.
- The consortia must be open to all public schools and other eligible clients within each region.
- The Department expected to fund eight consortia—one within each of the Department's pre-defined regions.

The purpose of establishing the Regional Assistance Centers to receive and administer the grant was to promote local control in the area of professional development. This approach benefits school districts that do not have resources to offer professional development themselves, and that may have had to rely primarily on Department efforts in the past. Through the Regional Assistance Centers, these districts can work cooperatively with others to develop and access professional development activities needed in their region. Most of the 18 school district superintendents we interviewed believe the Regional Assistance Centers have had a positive impact on their districts.

However, a drawback of this approach is that it created an additional administrative layer between the Department and the districts. Where in the past the Department had either offered professional development services or funds directly to districts, it now offers funds to the Regional Assistance Centers, which in turn offer services or funds to districts. In addition, the centers generate new administrative costs, averaging about 5 percent of the grant total, or about \$188,000 for all eight regions in Fiscal Year 2001. Every dollar spent on administration of the programs is a dollar not spent on direct services. Almost half the superintendents we spoke with voiced concerns about the cost of the Regional Assistance Centers, and mentioned this additional administrative layer as a disadvantage.

Other concerns raised by some of the school district representatives we contacted include:

- The goals for professional development established by the Regional Assistance Centers do not always align with the goals of the districts being served.
- Only a small percentage of schools served by the Regional Assistance Centers are receiving services or taking advantage of activities.
- The decision-making process and distribution of services by the Regional Assistance Centers are not always equitable, and some are not responsive to their advisory boards.

BOCES existed in the regions prior to the establishment of the Regional Assistance Centers and 17 of the BOCES already offered staff development services to their member districts. As established organizations with their own staff and administrative structures, some of the BOCES may be able to use the Colorado Coordinated Professional Development and Technical Assistance grant funds to offer professional development services more cost-effectively, with lower added administration, than the Regional Assistance Centers.

Future Funding for the Regional Assistance Centers Is Uncertain

One source of grant funds for the Regional Assistance Centers is the federal Goals 2000 grant, which provides nearly half of the grant funding, or about \$2 million in Fiscal Year 2000. This grant ends after Fiscal Year 2001. According to Department staff, there is no other funding source to replace the Goals 2000 money in Fiscal Year 2002, but by the following year, money from other federal sources may be available. Department staff have expressed concerns that if other funds are not found, the Regional Assistance Centers may not be sustainable. Due to the potential loss of a substantial portion of their funding, this may be an appropriate time for the Department to assess whether the regional assistance center structure is an efficient and effective means of providing professional development to school districts. Making the grant available to other applicants, such as BOCES, other consortia, or even individual school districts, could allow the provision of professional development at the local level to continue even with changes in the funding levels.

In 2002 the Department plans to conduct a three-year external evaluation of the Regional Assistance Centers. The study will assess the impact of the grant program on student achievement, examine the effectiveness of the implementation of the grant program, and identify recommended practices. However, we reviewed the planned assessment tool and

found that the evaluation may not consider all the issues discussed above. The Department has developed criteria for the evaluation, but the criteria may not address concerns about the lack of participation of all districts in the centers' decision making or the efficiency of the centers in delivering professional development services. We believe the Department should reschedule the planned evaluation to occur at the end of the current year and ensure that it addresses the issues of efficiency, effectiveness, and sustainability of the Regional Assistance Centers.

Recommendation No. 17:

The Department of Education should consider alternative methods for distributing professional development funds and/or services to school districts throughout the State. In particular, the Department should consider expanding the pool of eligible applicants to include BOCES, school district consortia, and individual school districts. In addition, the Department should evaluate the Regional Assistance Centers at the end of 2001 rather than 2002, paying particular attention to the efficiency, equity, and sustainability of operations to help determine if the Regional Assistance Centers are the best means for providing professional development.

Department of Education Response:

Agree. The audit accurately defines the purposes, intended values, and funding problems of the Regional Assistance Centers (RACs). The planned review of the RACs should be re-evaluated and modified as needed to assure that the costs, effectiveness, and outcomes of the centers are fully revealed.

Appendix A
Examples of School District Reporting Requirements

Reporting Deadline	Reporting Requirement	Legal Authority	Method/Format of Data Submission	Major Uses and Users of Submitted Data	Examples of Required Data
March	Miscellaneous report card data not included in other reports	Section 22-7-605, C.R.S.	Web-enabled data collection.	Used to prepare school report cards for the Department of Education, Governor's Office, State Legislature, schools, districts, parents, and the general public.	Information about whether the school requires uniforms, has a closed campus, and holds parent conferences. Also includes the number of professional development days and school year length.
June	Suspensions and Expulsions	Section 22-33-105, C.R.S.	Web-enabled data collection.	Colorado Department of Education: For trend analysis, accreditation, and to prepare school report cards used by schools, districts, policy makers, parents, and the general public.	Number of students who were suspended or expelled in the prior school year.
July	Graduation and Dropout Rates for Middle, Junior, and High Schools	Section 22-11-104, C.R.S., for graduation rates; Section 22-2-114.1, C.R.S., for dropout rates.	District staff submit via computer diskette.	Department of Education: For trend analysis, school report cards, accreditation. Used by schools, districts, the public, and policy makers.	Number of students who graduated and dropped out in the prior school year.
August	Special Ed: Application for Federal Funds	Federal Law	Special Education Administrative Unit staff submit via computer diskette.	Federal Government: Application required by the Individuals with Disabilities' Education Act.	Administrative unit budgets, employee names and salaries, time records, funding sources.
August	Special Ed: Student Discipline Information	Section 22-20-104, C.R.S.	Special Education Administrative Unit staff submit in hard copy.	Federal Government: Compliance with Federal Individual with Disabilities' Education Act.	Number of incidents involving weapons and drugs. Number of student removals, suspensions, and expulsions. All data are reported by category of disability and race/ethnicity.
August	Special Ed: Revenues and Expenditures	Section 22-20-104, C.R.S.	Special Education Administrative Unit staff submit via computer diskette.	Federal Government, State Legislature, and the general public.	Data on staff paid for with federal funds; performance reports for federal grants; federal equipment inventory; revenues/expenditures by fund source.
November	Student Count Data (includes Free and Reduced Lunch data) as of October 1	Section 22-54-112, C.R.S.	Electronic upload from Internet via the Automated Data Exchange.	Colorado Department of Education: To calculate per pupil funding as well as funding for some federal and state grants such as Title I. To report demographics, perform trend analyses, prepare school report cards.	For each student: district, school, gender, date of birth, and grade; public school funding status.

Appendix A
Examples of School District Reporting Requirements

Reporting Deadline	Reporting Requirement	Legal Authority	Method/Format of Data Submission	Major Uses and Users of Submitted Data	Examples of Required Data
November/ December	CSAP Label Data	Section 22-7-409, C.R.S.	District sends a file via the Automated Data Exchange to the Department, which then sends the data to McGraw-Hill, where the CSAP labels are produced.	Labels are affixed to CSAP booklets to replace hand-written information.	Student name, district, school, gender, date of birth, and grade.
December	Financial Data	Section 29-1-603, C.R.S.	Electronic upload from Internet via the Automated Data Exchange.	Colorado Department of Education: For audit (internal and external), budgeting, annual report preparation, publishing of education statistics and school report cards, used by schools, districts, the public, and policy makers.	Revenues and expenditures for the district for the past fiscal year.
December	School District Personnel Information	Section 22-2-112, C.R.S.	Electronic upload from Internet via the Automated Data Exchange.	Colorado Department of Education: For trend analyses, cost of living calculations, and preparation of district statistics and school report cards used by schools, districts, the public, and policy makers. Also used to investigate complaints about license holders.	Names, social security numbers, birth dates, degrees, teaching areas, employment dates, gender, race, experience, and email addresses for all employed staff.
December	Special Ed: Staff and Student Information	Section 22-20-104, C.R.S.	Special Education Administrative Unit staff submit via computer diskette.	Verification of staff qualifications, distribution of funds, and reporting of special education student and staff data for the State Legislature, the general public, and the Federal Government.	For all staff: name, social security number, and assignment. For all students: name, date of birth, disability, race/ethnicity, and gender.
Year Round	Grants: Federal and State	Various	Districts submit data to the Department in hard copy and electronically.	Colorado Department of Education and the Federal Government use to ensure compliance with grant requirements.	Varies based on the grant. Typically includes program costs and outcomes.
Upon Employment	Special Ed: Temporary Teacher Eligibility	Section 22-20-104, C.R.S.	Special Education Administrative Unit staff submit in hard copy.	Application to allow temporary employment of teachers with valid Colorado licenses who are in a university program leading to a special education endorsement.	Teacher name, social security number, license number, verification from the Administrative Unit that a qualified person was not available and verification of enrollment from the university.

Source: Office of the State Auditor compilation of information from the Department of Education.

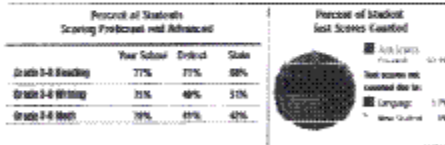
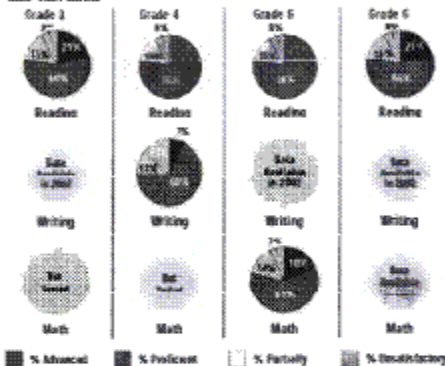
Note: This appendix contains examples of the main reporting requirements for school districts; it is not inclusive of all data reporting requirements.

Appendix B

STUDENT PERFORMANCE

Colorado students are assessed each year in order to measure their performance on state academic content standards, using the Colorado Student Assessment Program (CSAP). This chart shows the results for grades 3-6 in the subject areas of reading, writing and math.

CSAP 2001 Results



CSAP results are reported by school, district and state. The state results are reported by grade and subject. The district results are reported by grade and subject. The school results are reported by grade and subject. The state results are reported by grade and subject. The district results are reported by grade and subject. The school results are reported by grade and subject.

Overall Academic Performance for the 2000-2001 school year: **High**

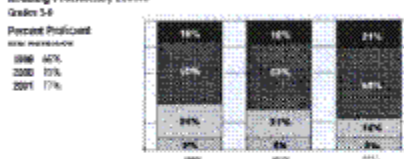
SCHOOL HISTORY

	1998-1999	1999-2000	2000-2001
Overall Academic Performance	Low	Moderate	High
School Improvement	Not Improved	Improved	Improved

* Not calculated for 1998-1999 school year

CSAP is a summative measure of student learning and achievement for all public schools in Colorado. It is used to measure student performance in reading, writing and math. The results are reported by grade and subject. The state results are reported by grade and subject. The district results are reported by grade and subject. The school results are reported by grade and subject.

Reading Proficiency Levels



Writing Proficiency Levels



Math Proficiency Levels



Overall Academic Performance for the 2000-2001 school year: **High**

ABOUT OUR STAFF

School Employment

Each year, your school reports to the Colorado Department of Education on the number of adults who work in your school, as well as the type of work they do last year, your school employed:

Year School	District
1999	1,301
2000	1,345
2001	1,345
2002	1,345

* Full time and part time teachers permanently assigned to this school

** School counselors are included in the Other Professionals category

*** Other Professionals employed via contract or per diem

Students per Teacher Ratio

Student Enrollment	Students per Teacher
Grade 1	20
Grade 2	22
Grade 3	24
Grade 4	22
Grade 5	21
Grade 6	17

Professional Experience of Teachers

Year School	District
1999	14
2000	14
2001	14
2002	14

Salaries

Year School	District	State
1999	\$ 43,484	\$ 40,440
2000	\$ 43,484	\$ 40,440
2001	\$ 43,484	\$ 40,440
2002	\$ 43,484	\$ 40,440

Principal, Susan Parnowski

Number of years as Principal at this school: 12

Number of years as Principal at any school: 12

Blue Spruce Elementary

11000 Parkview Drive • Northglenn, CO 80061 • 303.437.4207

For more information and further details about this report, visit www.state.co.us/edw/eds
Colorado Department of Education • 201 East Colfax Ave • Denver, CO 80202

SAFETY AND SCHOOL ENVIRONMENT

Safe and Orderly School Features

Your school	does	does not
allows after school programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>
requires student uniforms	<input type="checkbox"/>	<input checked="" type="checkbox"/>
encourages community programs in school building	<input type="checkbox"/>	<input checked="" type="checkbox"/>
conducts home visits	<input checked="" type="checkbox"/>	<input type="checkbox"/>
has a closed campus	<input checked="" type="checkbox"/>	<input type="checkbox"/>
conducts periodic fire drills	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Safety and Discipline

Safe schools are a top priority for parents, teachers, and communities. Your school's safety and discipline record for the 2000-2001 school year is:

Type of Incident	Number of Incidents Reported		Action Taken		Other Information
	2000-2001	1999-2000	2000-2001	1999-2000	
Arms & Weapons (By-Sc)	0	0	0	0	0
Substance Abuse	0	0	0	0	0
Sexual Offenses	0	0	0	0	0
Stolen Automobile	0	0	0	0	0
Stolen Property	0	0	0	0	0
Other Incidents as Defined by C.R.S.	0	0	0	0	0
Discipline	0	0	0	0	0
Code of Conduct	0	0	0	0	0

Student Attendance and Time Spent in Classrooms

	2000-2001	Your School	Dropout Rate
Length of School Year	180 days	181 days	0%
Enrollment	347	347	
Average Daily Attendance	91.7%	91.7%	
Student Dropouts	76	76	21%
Students Over School Year	19,129	19,129	
Annual Number of Teacher Days Scheduled without Student Contact	0	0	

Source: U.S. Dept. of Education, 2000

	1998-1999	1999-2000	2000-2001
Market Average Daily Attendance	87%	87.5%	91.8%
Market Dropout	7%	8%	2%
Safety and Discipline Incidents Reported	42	34	37

OVERALL ACADEMIC PERFORMANCE MEASURES

- Excellent
- High
- Moderate
- Low
- Unsatisfactory

SCHOOL IMPROVEMENT MEASURES

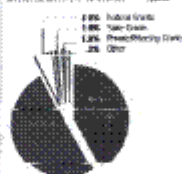
- Significant Improvement
- Improvement
- Stable
- Decline
- Significant Decline

TAXPAYERS' REPORT

Overview of School District Revenue

	2000-2001
Local Tax Contribution	\$48,970,000
State Tax Contribution	\$1,737,000
Federal Grants	\$3,277,000
State Grants	1,730,000
Private/Partnership Grants	965,000
Other Discretionary Income	1,140,000
Total School District Revenue	\$57,812,000
Total 2001 District Students Per Pupil	\$4,302

District Allocation of Funds



District Use of Funds

	2001
Teachers	\$124,638,917
Administrators	19,445,870
Building & Facilities Maintenance	1,880,480
Operational Expenses	1,175,520
Transportation	1,200,140
Total	\$149,140,927

District Use of Funds — 2001



District Debt and Capital Construction & Equipment

Total Outstanding Bonded Debt	\$ 271,000,000
Average Annual Percentage Interest Rate on Debt	5.25%
Amount Received from State Bond Aid	\$ 50,000,000
Amount Spent on New Buildings During Last 2 Years	\$ 14,000,000

Your Approved Funding Changes

Your Community did did not had an election last November. The following items have been approved by voters:

<input type="checkbox"/> Increase in property taxes	<input checked="" type="checkbox"/> Increase in state aid	<input checked="" type="checkbox"/> Increase in state bond aid
	\$ 50 million	\$ 40 million

Blue Spruce Elementary

11314 Colorado Hwy - Rocky Mountain, CO 80001 - 303-733-4527

For more information and further details about this report, visit www.state.co.us/schools
 Additional information at www.state.co.us/schools - 2001 State School Report - Districts

BLUE SPRUCE ELEMENTARY SCHOOL

Annual Accountability Report 2000-2001 School Year

School Performance Summary

Overall Academic Performance

High

Percent of students meeting or exceeding state standards
 State of Colorado Department of Education, 2000-2001

Improved

How Blue Spruce Elementary School Compares to Nearby Elementary Schools

School	Performance
Ponderosa Elementary	Excellent
Lodge Pole Elementary	Moderate
Eagles Nest Elementary	High
Rainbow Trout Elementary	High
Bighorn Sheep Elementary	Moderate
Lark Sparrow Elementary	Unsatisfactory
Rocky Mountain Elementary	Low
Arroyo Wolf Elementary	Moderate
High Peak Elementary	Low

1 Located in Mustang, 100% of school district
 2 Located in Golden, 100% of school district

School Report Cards prepared by the Colorado Department of Education
 are independently audited and verified by
 (781) 944-1800

For more information on additional schools, visit

www.state.co.us/schools

Appendix C

Staff Assigned to Regional Service Teams by Specialty Area as of June 2001								
Specialty Area	Education Region							
	Northeast	North Central	Northwest	West Central	Southwest	Southeast	Pikes Peak	Metro
Regional Manager	X	X	X	X	X	X	X	X
Regional Coordinator		X					X	X
Special Education	XX	XXX	XXXX	XXXX	XXX	XX	XXXX	XXXX
Regional Special Education*								
Title I	X	X	X	XX	X	X	X	X
Early Childhood*	X		X		X	X	X	
English Language Acquisition*		X			X			XXX
Prevention Initiatives*	X		X	X	X		X	X
Math		X						
Education Technology*								
Education Telecommunications*	X		X		X	X	X	X
Family Literacy		X					X	X
Library Services		X	X	X	X		X	X
Environmental Education			X					
Science							X	
Even Start							X	
Fine Arts/Physical Education								X
English Language Acquisition Council		X	X	X	X		X	X
Charter Schools								X
* Indicates areas where specialists serve more than one region.								
X = Team staff assigned.								

Source: Office of the State Auditor analysis of information from the Department of Education.

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d.b.a. General Support Services
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Honorable Bill Owens, Governor

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