January 31, 2019

The Honorable Ron Johnson
Chairman
Committee on Homeland Security and Governmental Affairs
United States Senate

K-12 EDUCATION: Challenges to Assessing Program Performance and Recent Efforts to Address Them

The U.S. Department of Education (Education) plays a key role in supporting educational opportunities for K-12 students, including awarding grants and overseeing compliance with federal education laws. Over the past decade, Education’s grant awards have generally increased in number and size. Using Education budget data, we determined that in Education’s appropriation for fiscal year 2019, Congress appropriated approximately $38 billion for Education’s K-12 programs. Further, the Every Student Succeeds Act (ESSA), enacted in 2015, changed the education landscape. ESSA includes certain provisions that increase flexibility for state and local educational agencies, such as allowing them to develop performance measures suited to their unique needs, and requires Education to conduct new program evaluations. Performance assessment activities provide feedback on program design and implementation and can help inform program planning, management, and oversight.

However, questions have been raised about how Education assesses the performance of its wide-ranging education programs. Both GAO and Education’s Office of Inspector General (OIG) have reported on various management and oversight issues related to Education’s program performance. You asked us to review Education’s K-12 program performance assessment activities and related barriers. This report describes challenges Education faces in assessing the performance of its K-12 programs as well as steps it has taken to address them.

To identify challenges to program performance assessment and learn about steps Education has taken to address them, we reviewed our wide body of work on government-wide performance assessment activities and Education’s K-12 programs. We also reviewed relevant Education documents and reports, such as the agency’s strategic plans for fiscal years 2014-2018 and 2018-2022 and associated annual performance reports. In addition, we reviewed relevant Education OIG reports, including recent annual reports on management challenges. We conducted a comprehensive analysis of information gathered from these documents to identify common challenges to program performance assessment. We interviewed Education officials from three offices—the Institute of Education Sciences; the Office of Planning, Evaluation, and Policy Development; and the Office of Elementary and Secondary Education—which we selected based on their responsibilities for carrying out various K-12 program performance assessment activities. The Institute of Education Sciences and the Office of

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1 This reflects amounts listed by Education as being appropriated for programs under the Elementary and Secondary Education Act and for certain programs under the Individuals with Disabilities Education Act.
Planning, Evaluation, and Policy Development are generally responsible for supporting various program performance assessment activities. The Office of Elementary and Secondary Education is responsible for directing and coordinating policy for programs designed to improve K-12 outcomes.\(^2\) We solicited officials’ perspectives on the performance assessment challenges we identified through our analysis and inquired about any additional challenges. To identify specific K-12 examples that illustrate each of the challenges, we reviewed our prior related reports and relevant Education OIG reports and considered the views of Education officials. Although these examples are not generalizable, they reflect a variety of K-12 programs and show a range of Education’s actions in response to the challenges. We also reviewed relevant federal laws and regulations pertaining to ESSA and performance assessment activities. For this review, we did not conduct any new assessments of the performance of any of Education’s K-12 programs.

We conducted this review from February 2018 to January 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

**Background**

Various entities at Education carry out program performance assessment activities (see table 1), which include performance measurement and program evaluation. The process of setting goals and tracking progress is known as performance measurement. The Government Performance and Results Act of 1993, as amended, requires Education to establish overall agency performance goals and measures and to report on progress toward these goals at least annually, among other things.\(^3\) At the program level, Education also carries out performance measurement activities and conducts program evaluations for certain programs. Program evaluations are systematic studies that use research methods to address specific questions about program performance.\(^4\)

\(^2\) Other program offices within Education administer or support K-12 programs, such as the Offices of State Support and Innovation and Improvement. Although we did not interview officials from these offices, Education provided specific examples related to assessing programs they administer.


### Table 1: Program Performance Assessment Activities of Selected Offices at Education

<table>
<thead>
<tr>
<th>Category</th>
<th>Category description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Institute of Education Sciences</td>
<td>Conducts program evaluations that often span multiple years; collects certain data from state educational agencies; produces rigorous evidence; conducts evaluations that estimate program impact and assess program implementation; and carries out certain evaluations required by law.</td>
</tr>
<tr>
<td>Office of Planning, Evaluation, and Policy Development</td>
<td>Manages and coordinates planning, evaluation, data, and policy development activities in collaboration with program offices; and coordinates various evidence-related activities, such as reporting on related strategic objectives. Within this office, the Policy and Program Studies Service conducts implementation evaluations and focuses on shorter-term performance assessment activities and studies.</td>
</tr>
<tr>
<td>Program Offices</td>
<td>Develop program performance measures; analyze grantee performance data; conduct ongoing monitoring of grantees; and provide technical assistance. Various K-12 program offices are located within the Office of Elementary and Secondary Education.</td>
</tr>
</tbody>
</table>

Source: U.S. Department of Education (Education) and GAO reports.  

In some cases, grant recipients—such as state educational agencies—are responsible for measuring performance, evaluating programs, or both, as a condition of receiving funds. Grantees may also be responsible for collecting data on program performance and reporting to Education. Education’s program offices play a role in performance assessment as well by, for example, supporting grantees in conducting evaluations, monitoring grantee performance, or collecting and reporting data from grantees.

**Education Has Taken Steps to Address Persistent Challenges to K-12 Program Performance Assessment**

We identified four key challenges Education faces in assessing K-12 program performance: 1) oversight and monitoring, 2) data quality, 3) capacity, and 4) methodological limitations (see fig. 1). These challenges are complex and persistent. Federal programs are implemented in dynamic environments where competing priorities must be continually balanced and addressed in a way that meets local needs. Education has taken steps to mitigate these common performance assessment challenges, which could improve transparency and understanding about the extent to which Education’s K-12 programs are achieving their goals. Education’s ongoing efforts to address challenges may prove particularly important given the changing education landscape under ESSA.
Figure 1: Key Challenges in Assessing K-12 Program Performance

Accessible Text for Figure 1: Key Challenges in Assessing K-12 Program Performance

Key challenges

- **Oversight and monitoring**: These challenges include those related to monitoring grantee performance and compliance with requirements, conducting audits and evaluations, and improving risk management.

- **Data quality**: These challenges include those related to the ability to collect or report useful performance information that meets users’ needs for completeness, accuracy, consistency, timeliness, validity, usability, and other attributes.

- **Capacity**: These challenges include those related to the ability to use performance assessment information in decision making and organizational resources to conduct assessment activities and implement results.

- **Methodological limitations**: These challenges include those related to difficulties assessing program effectiveness due to outcomes that are hard to measure or the complexity of the program.

Source: GAO analysis of Department of Education documents and GAO reports. | GAO-19-266R
GAO has identified weaknesses in Education’s internal controls that have hindered Education’s oversight and monitoring of grantees, and its assessments of K-12 program performance. In addition, over the past decade, Education’s OIG has repeatedly identified oversight and monitoring of grantees as a management challenge. Education officials acknowledged that these are persistent agency challenges and, as shown below, described steps to improve Education’s oversight and monitoring activities.

In April 2017, we reported that Education’s oversight of discretionary grants monitoring was limited, including within the Office of Elementary and Secondary Education. Specifically, we found that certain offices did not consistently document required monitoring activities in official grant files. For example, almost all of the official grant files among the nongeneralizable sample of 75 grant files we reviewed were missing key monitoring documents, including grantee performance reports, which describe the results grantees achieve with grant funds. As a result, about $21 million in discretionary grant funds lacked correct documentation of grantee performance in the official grant files GAO reviewed. We reported that documenting the results of monitoring activities helps verify and demonstrate whether grantees made adequate progress toward program objectives, which informs Education’s decisions to continue awarding grants to recipients. In response to our recommendation that Education establish and implement written supervisory review procedures for official grant files, Education officials said they are developing a department-wide standard operating procedure for creating and maintaining official grant records and are planning to issue it in early 2019.

Education’s OIG has also identified internal control issues in Education’s grant monitoring activities. For example, in September 2016, the OIG found that the program office that administers and oversees the Rural Education Achievement Program had conducted very limited monitoring to determine whether grantees were making progress toward program goals. In addition, the OIG found that the office was not using data to inform monitoring efforts or provide assistance to grantees in meeting program goals. The OIG also found that the program office had not developed or fully implemented procedures for monitoring grantees’ performance. As a result, the OIG made several recommendations to Education to improve its program oversight and monitoring. The report states that Education has taken several steps in response to the OIG’s recommendations, such as conducting a risk assessment of Rural Education Achievement Program grantees to inform its monitoring efforts.

To enhance its grantee oversight and monitoring, Education has also issued guidance that provides resources and examples to help state and local educational agencies comply with ESSA and implement certain programs. For example, Education issued guidance to state and local educational agencies on ways to strengthen the effectiveness of education investments

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6 According to GAO-17-266, Education officials stated that they found the missing performance reports and acknowledged that some were found outside of the official grant files, such as in other Education systems. According to Education’s Handbook for the Discretionary Grant Process, these key monitoring reports should be included in the official files.

and improve outcomes under ESSA.\(^8\) The guidance encourages grantees to develop implementation plans, including strategies to monitor performance and plans for data collection and analysis. It also recommends that grantees examine the effects of their efforts and use performance monitoring and evaluation information to inform decision-making.

While such efforts serve to mitigate challenges related to oversight and monitoring, these challenges will likely persist as Education continues to implement ESSA. Education officials told us that the flexibility ESSA provides for state and local educational agencies under various grant programs complicates efforts to design program-level performance measures because state and local educational agencies’ program goals vary based on their unique needs. According to officials, they have begun to work closely with states to develop new program performance measures, which they anticipate will be a multi-year effort. In addition, according to Education officials, the agency is currently reviewing its guidance for program offices on how to create an effective monitoring plan to determine whether aspects of the guidance should be revised to better address new ESSA requirements.

Persistent quality issues with K-12 data that grantees submit to Education have limited Education’s ability to use those data to assess performance. GAO has reported on data quality issues related to specific K-12 programs. In addition, Education’s OIG has consistently identified data quality as a management challenge.

In April 2017, we reported that Education lacks reasonable assurance that data submitted by grantees for its 21st Century Community Learning Centers grant program are accurate, and that these data may not be useful to Education for decision making and reporting.\(^9\) We found that although Education’s internal guidance states that data should be processed and edited to help ensure they are accurate, Education did not independently assess the accuracy of these program data submitted by grantees or perform basic logic checks.\(^10\) We recommended that Education conduct federal-level data checks on the accuracy of data submitted by grantees. In response to our recommendation, Education officials described various ways in which they modified and improved the agency’s data system to perform these types of checks and reduce errors.

A 2016 OIG report also noted concerns about Education’s controls over state-reported K-12 program data more broadly.\(^11\) For example, the report stated that the agency could make improvements to its procedures to help ensure the accuracy and reliability of K-12 data that


states report. The OIG recommended improvements, and Education agreed to take action. For example, Education reported taking a number of steps to enhance data quality, including implementing new management certification language for key state performance reports. Education officials told us the strengthened certification language requires states to attest that they have internal controls over their data. Additionally, Education officials told us that individual program offices are also taking a variety of actions to address concerns about the quality of data states submit. For example, officials said certain program offices have sent letters to grantees about data quality issues and implemented grant requirements aimed at addressing data quality issues.

Education officials told us they are implementing efforts to improve the quality of K-12 program data more broadly. For example, officials from the Office of Elementary and Secondary Education told us they provide ongoing technical assistance to state educational agencies to help them meet data and reporting requirements and review the data they submit. They also said they recently established a data quality community of practice that convenes state-level grantee administrators to discuss data quality issues and concerns.

Despite these efforts, Education officials said that data quality challenges will likely persist under ESSA because Education and its grantees continue to face challenges collecting reliable, comparable program performance data in a minimally burdensome manner.

Education’s ability to oversee and monitor grantees, collect and report quality data, and use performance assessment information in decision making is directly related to its capacity and organizational resources. We have previously reported on Education’s known capacity for conducting evaluations, and raised concerns about Education’s human capital management. According to Education officials, capacity has been and remains a challenge to assessing K-12 program performance to some extent.

We have previously reported on Education’s capacity for performance assessment activities, including challenges related to its ability to coordinate and prioritize evaluation research. In December 2013, we reported that statutory requirements related to evaluation funding posed certain challenges for the agency. Education officials we interviewed for our 2013 report stated that, as a result of statutory limitation, the funds available for evaluation were often insufficient to conduct high-quality program evaluations. To address this limitation, our 2013 report recommended that Congress consider granting Education authority to combine funds authorized for evaluations of Elementary and Secondary Education Act programs. In 2015, Congress implemented our matter for congressional consideration by providing Education authority in ESSA to consolidate funds available for program evaluation.

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14 Evaluation funds for programs authorized by the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act, are typically set aside as a percentage of program funding or as national activities funds. With some exceptions, Education is authorized to reserve up to 0.5 percent of program appropriations to conduct comprehensive program evaluations. 20 U.S.C. § 7941(a).

15 20 U.S.C. § 7981(c). According to our 2013 report, the President’s Fiscal Year 2014 Budget request for Education contained a proposal to increase Education’s flexibility to conduct program evaluations by allowing the department to
evaluation plans that specify which program evaluations will receive the consolidated funds.\textsuperscript{16} Agency officials said they have a process for coordinating and prioritizing which programs to evaluate. Officials told us that they weight various factors when deciding which evaluations to conduct, such as existing legal requirements to perform evaluations and whether certain programs have already been evaluated. Education officials told us that they have used the authority to consolidate funds to support high-quality program evaluations that otherwise may not have been possible. For example, according to Education officials, the department has used this authority to support new, high-quality impact evaluations and implementation studies to improve instruction and outcomes for K-12 students.

In its 2016 report on the Rural Education Achievement Program, Education’s OIG concluded that Education’s inadequate monitoring of program grantees was partly due to its limited human capital capacity. The report notes that, in response, Education requested additional staff. However, human capital management not only relates to having enough staff, but it also entails having staff with the right skills to carry out their duties. In its 2018-2022 strategic plan, Education identified various ways in which it aims to build capacity to enhance performance assessment activities.\textsuperscript{17} However, Education last issued a hiring plan in 2009, which outlined specific hiring goals and related initiatives, according to our 2017 report.\textsuperscript{18} At the time of our 2017 report, Education officials said they were reviewing the effectiveness of Education’s strategy to recruit, hire, and retain staff—including grant staff. As part of the review, Education planned to assess its efforts to recruit diverse candidates and review the job series that comprise the department’s grant workforce to ensure job descriptions match the duties being performed by staff in those roles. Education planned to issue an updated hiring plan in late 2017 but, as of December 2018, agency officials did not respond to our request for an update.

Education officials also stated that they implemented a risk-based approach for selecting grantees to monitor for the Rural Education Achievement Program. Officials told us that given the large number of program grantees and the agency’s limited oversight resources, they rely on risk assessments to inform their monitoring plans. Beyond this program, Education officials noted that they use various risk assessment tools and methods to inform how they spend resources on monitoring efforts. Such risk-based strategies may help Education leverage its existing resources and target them where they are most needed.

We have previously reported on methodological limitations to assessing program performance, such as difficulties assessing the benefits of flexible grant programs, isolating program impact, and measuring long-term outcomes.\textsuperscript{19} Education officials told us that methodological challenges, such as isolating program impact, are difficult to address.

In May 2014, we reported on the difficulty Education faces use funds from certain programs across the department for this purpose. Beginning in fiscal year 2014, Education was authorized to combine funds for evaluations through its annual appropriations.

\textsuperscript{16} ESSA requires Education to develop an evaluation plan on a biennial basis. 20 U.S.C. § 7981(d).

\textsuperscript{17} U.S. Department of Education Strategic Plan for Fiscal Years 2018-2022.

\textsuperscript{18} GAO-17-266.

in evaluating the effectiveness of the Promise Neighborhoods program in part because the program provides certain flexibilities to grantees and the lack of a national evaluation plan. Education had collected a large amount of data from grantees that were intended, in part, to be used to evaluate the program. However, we found that Education officials had not developed plans for how to use the data or evaluate the program. The report stated that an official from Education’s Institute of Education Sciences said it was not feasible to conduct a national impact evaluation for the program and described alternative evaluation options, though each had limitations. Partly in response to our recommendation that Education develop a plan to use the data collected from grantees to conduct a national evaluation of the program, Education awarded a contract in fiscal year 2018 to develop feasible design options for evaluating the program’s effect on student outcomes. In November 2018, Education officials stated that their next step is to conduct a national impact evaluation of the program and that they intend to award a new contract in late fiscal year 2019.

We have also previously reported on challenges related to programs that aim to improve complex systems, such as an educational system, over which federal agencies have limited control. For example, education is primarily a state and local responsibility in the United States. The federal Title I program helps states and localities meet low-income students’ educational needs by supporting a broad range of activities that aim to provide them with significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. However, we have reported that portraying the results of federal formula grant and block grant programs with loosely defined objectives, such as Title I, presents a significant challenge. There are external factors that influence these programs’ goals and outcomes over which Education has limited control. In an effort to mitigate these challenges, Education has employed different strategies. For example, Education’s grantees establish certain long-term goals and measure interim progress for the Title I program. This strategy minimizes risk due to Education’s limited control over external factors. If the agency cannot assess overall program goals, it may be able to demonstrate program effectiveness through these measures of interim progress.

Education continues to pursue broader efforts that could help mitigate methodological challenges. For example, Education’s Evidence Planning Group brings together different offices from across the agency to coordinate on performance assessment activities, according to Education officials. Officials also noted that the group has started a systematic review of how grant competitions use and generate evidence, with the goal of increasing the rigorous use of evidence across the agency’s programs. Officials indicated that the group’s efforts are ongoing and stated the lessons learned from this effort could inform the design of new programs, performance metrics, and grant recipient requirements.

Agency Comments


22 For example, see GAO, Managing for Results: Measuring Program Results That Are Under Limited Federal Control, GAO/GGD-99-16 (Washington, D.C.: Dec. 11, 1998).

23 The Office of Planning, Evaluation, and Policy Development convenes this group, which also includes staff from the Institute of Education Sciences and the Office of Innovation and Improvement. In Education’s technical comments on a draft of this report, officials noted the agency’s reorganization plans include merging the Office of Innovation and Improvement with the Office of Elementary and Secondary Education.
We provided a draft of this report to the Department of Education (Education) for review and comment. Education provided written comments that are reproduced in enclosure I, as well as technical comments that we incorporated, as appropriate. In its written comments, Education stated its commitment to maximizing the performance of federally-funded K-12 programs and to fully responding to the GAO and OIG reports cited in this report. It also noted that the agency’s reorganization should better position it to support program performance assessment.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Education, and other interested parties. In addition, this report will be available at no charge on GAO’s website at http://www.gao.gov.

If you or your staff members have questions about this report, please contact me at (617) 788-0580 or nowickij@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in enclosure II.

Jacqueline M. Nowicki
Director, Education, Workforce, and Income Security Issues

Enclosures
Enclosure I: Comments from the Department of Education

UNIVERSITY OF EDUCATION
OFFICE OF PLANNING, EVALUATION AND POLICY DEVELOPMENT

January 11, 2019

Ms. Jacqueline M. Nowicki
Director, Education, Workforce, and Income Security Issues
Government Accountability Office
Washington, D.C. 20548

Dear Ms. Nowicki:

Thank you for the opportunity to review the draft Government Accountability Office (GAO) report titled, “K-12 Education: Challenges to Assessing Program Performance and Recent Efforts to Address Them,” (GAO-19-266R). The U.S. Department of Education (ED) appreciates the GAO’s focus on the assessment of program performance and is pleased to respond.

ED is committed to maximizing the performance of federally funded K-12 programs in partnership with the broader education community, including students and families, local organizations, school districts, and states. We have demonstrated the importance of this work through our Strategic Plan; one of our four goals is to “strengthen the quality, accessibility and use of education data through better management, increased privacy protections and transparency.”

We recognize the importance of our human capital capacity in supporting the assessment of program performance. The reorganization of ED that took effect on January 6, 2019 made a number of changes that will lead to a more effective and efficient way of executing our mission, including by better leveraging staff knowledge and expertise. For example, we are planning to boost our capacity in the Office of Planning, Evaluation and Policy Development through a redesigned Policy and Program Studies Service (PPSS). With appropriate resources, PPSS will be positioned to deepen its support for education policy decisions by providing analytic support and research and data expertise to the Assistant Secretary and program offices. Through its work, PPSS will improve internal and external decision-making, optimize programs for desired outcomes, generate efficiencies to reduce reporting and other burdens on stakeholders, and promote the development, collection, analysis and use of high-quality and open data.

We are committed to fully responding to the other GAO and Inspector General reports cited in this draft report. Attached are technical comments. Please let me know if you have any questions or concerns.

Sincerely,

James C. Blew
Assistant Secretary for Planning, Evaluation and Policy Development

400 MARYLAND AVE., S.W. WASHINGTON, D.C. 20202-2110
January 11, 2019

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Director, Education, Workforce, and Income Security Issues
Government Accountability Office
Washington, D.C. 20548

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Sincerely,

James C. Blew
Assistant Secretary for Planning, Evaluation and Policy Development

Enclosure II: GAO Contact and Staff Acknowledgments

GAO Contact:
Jacqueline Nowicki, (617) 788-0580 or nowickij@gao.gov

Staff Acknowledgments:
In addition to the contact named above, Jamila Jones Kennedy, Assistant Director; Meredith Moore, Analyst-in-Charge; James Bennett; Valerie Caracelli; Kathryn O’Dea Lamas; Benjamin Licht; Jessica Orr; Huseyin Sari; Monica Savoy; and Benjamin Sinoff made significant contributions to this report. Also contributing to this report were Deborah Bland, Lilia Chaidez, Maria Gadel, and Sheila R. McCoy.
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