

UNITED STATES DEPARTMENT OF EDUCATION OFFICE OF INSPECTOR GENERAL

400 Maryland Avenue S.W., Washington, DC 20202-1510

February 27, 2006



Control Number ED-OIG/X07F0002

Raymond Simon Deputy Secretary Office of the Deputy Secretary U.S. Department of Education 400 Maryland Ave, SW Washington, DC 20202

David Dunn Acting Under Secretary Office of the Under Secretary U.S. Department of Education 400 Maryland Ave, SW Washington, DC 20202

Dear Deputy Secretary Simon and Acting Under Secretary Dunn:

This Final Management Information Report, titled *Overlapping Services in the Department of Education's Office of Postsecondary Education Programs*, is to provide information that you may find beneficial. The objectives of our review were to determine if Office of Postsecondary Education (OPE) grant programs 1) have duplicative program objectives aimed at serving like target populations and areas; and 2) if grant programs administered by other U.S. Department of Education (Department) offices contain program objectives that overlap with OPE grant programs. Our review focused on the FY 2003-2004 grant programs.

An electronic copy has been provided to your Audit Liaison Officer. We received your response dated February 10, 2006, concurring with the finding in our draft report issued on December 29, 2005. The response is included in its entirety as Attachment C. We made minor edits to the report to address technical corrections and clarifications you provided separately.

BACKGROUND

The Department establishes policy for, administers, and coordinates most Federal assistance to education. The Department's mission is to serve America's students to ensure that all have equal access to education and to promote excellence in our nation's schools. Some purposes as stated in the Department's mission include:

• Strengthen the Federal commitment to assuring access to equal educational opportunity for every individual.

- Promote improvements in the quality and usefulness of education through Federally supported research, evaluation, and sharing of information.
- Improve the coordination of Federal education programs.
- Improve the management of Federal education activities.
- Increase the accountability of Federal education programs to the President, the Congress, and the public.

OPE administers multiple programs that award thousands of discretionary and formula grants each year. These programs are intended to address the national need to increase access to quality postsecondary education, strengthen the capacity of colleges and universities, and provide teacher and student development resources. Many programs are generally designed to:

- Provide financial assistance to eligible students enrolled in postsecondary educational institutions,
- Improve postsecondary educational facilities and programs through the provision of financial support to eligible institutions,
- Recruit and prepare disadvantaged students for the successful completion of postsecondary educational programs, and/or
- Promote the domestic study of foreign languages and international affairs and support international education research and exchange activities.

The Department's Office of Vocational and Adult Education (OVAE) and Office of Elementary and Secondary Education (OESE) administer, coordinate, and recommend policy for improving quality and excellence of programs that are also designed to prepare students for postsecondary education and careers through strong high school programs and career and technical education.

REVIEW RESULTS

OPE administers at least 41¹ discretionary and formula grants with duplicative program objectives serving like areas and populations. There also are 14 OVAE and 13 OESE grant programs which overlap, completely or in part, with OPE grant programs. All programs contained some unique characteristics; however, there were a large number with overlapping objectives that offered similar services to the same or overlapping populations. Some programs may not have overlapping primary objectives; but a secondary objective overlaps an OPE program. We believe that this overlap is counter to the Department's mission to improve coordination and management of Federal education programs.

The Department has recommended in past budget requests a reduction in funding for or the elimination of some programs because they duplicate others or can be accomplished within other programs. Congress has sometimes followed those recommendations and other times continued to fund programs recommended for elimination or reduction. The multiple programs, all with their own legislation, regulations, program policies, applications, award competitions,

¹ We only reviewed programs administered through OPE, OESE, and OVAE.

monitoring, and reporting requirements are burdensome for the Department to administer. We noted little coordination between OPE, OESE, and OVAE grant programs. We suggest that the Department improve its coordination between programs within OPE and throughout the Department. We also suggest that grant programs be realigned to administer like programs by the same office within the Department, and to continue to work with Congress to consolidate or eliminate programs that have the same program objectives.

Programs with Overlapping Objectives Offering Similar Services to Overlapping Populations

Our evaluation of OPE's discretionary and formula grants identified 42 grant programs that could be grouped by related program purposes into eight different categories:

- 1. Teacher Quality and Professional Development;
- 2. Student Support for Postsecondary and Adult Education;
- 3. Postsecondary Student Aid;
- 4. Postsecondary Institutions;
- 5. Preparation of Students for Postsecondary Education;
- 6. International;
- 7. Curriculum; and
- 8. Training.

Because some individual programs have multiple goals and objectives, these programs may be included in more than one category. Each program listed in one or more of the eight categories have a similar purpose that provides, in whole or in part, similar services to like target groups. A table of the grant programs in each category is included as Attachment A of the report.

Analysis of Overlapping Programs

We have chosen to demonstrate the extent of overlapping by providing additional detail for three of the above categories in this report:

- Teacher Quality and Professional Development,
- Student Support for Postsecondary and Adult Education, and
- Preparation of Students for Postsecondary Education.

Teacher Quality and Professional Development

We identified seven OPE programs that provide funding to improve and strengthen teacher quality and professional development, along with increasing academic achievement. We also identified two OESE programs that either have a similar purpose or one component of the program is similar. The nine grant programs are listed below.

Table 1: Teacher Quality and Professional Development						
			2004			
Program Name ¹	Office	PO^2	Funding	Awards		
Demonstration Projects to Ensure Students with						
Disabilities Receive a Quality Higher Education	OPE	TSD	\$6,912,971	27		
Preparing Tomorrow's Teachers to Use Technology ³	OPE	TSD	\$0	25		
Teacher Quality Enhancement Grants (States,				19 States		
Partnerships, Recruitment)	OPE	TSD	\$88,887,451	38 Partnership		
Fulbright-Hays Faculty Research Abroad Fellowship				26 Fellowship		
Program	OPE	IE	\$1,385,649	23 institutions		
Fulbright-Hays Seminars Abroad-Bilateral Projects	OPE	IE	\$2,200,000	10		
Alaska Native and Native Hawaiian Serving Institutions	OPE	IDUE	\$10,935,100	16		
				53 Strengthening		
				26 Planning		
				207 Continuation		
Strengthening Institutions	OPE	IDUE	\$80,986,345			
		AITQ		104 SEA		
Improving Teacher Quality State Grants	OESE		\$2,930,126,132	104 SAHE		
Enhancing Education through Technology Program	OESE	SST	\$691,840,913	52		
	Totals		\$ 3,813,274,561	730		

1. Data was obtained from the Department's ed.gov website; the Guide to U.S. Department of Education Programs dated 2004; or program officials in OPE, OESE, and OVAE.

2. Program Offices: Teacher and Student Development Programs (TSD), International Education Programs (IE), Institutional Development and Undergraduate Education Programs (IDUE), Academic Improvement and Teacher Quality Programs (AITQ), School Support and Technology Programs (SST).

3. Project was forward funded in FY 2003 for 3 years for \$62,094,000.

- The seven OPE programs support increasing academic achievement by improving teacher quality with emphasis on technology, teaching students with disabilities, improving international studies, and strengthening curriculum development. These programs offer similar services such as: teacher recruitment, professional development activities, improving technology skills, and improving and strengthening academic programs of teacher education.
- The purpose of the two OESE programs is to improve academic achievement by increasing the number of highly qualified teachers and principals by recruitment or retention and through the use of technology.

The OPE programs are small in comparison to the two OESE programs in the amount of funding available. The OESE programs also are broader in scope while the OPE programs are relatively narrower in scope.

Student Support for Postsecondary and Adult Education

We identified nine OPE programs, that include in the various program purposes, providing support services to postsecondary and adult students to encourage the successful completion of their postsecondary and adult education. Programs identified offer very similar services to low-income students or students from disadvantaged backgrounds. Services include: information on college admissions and financial assistance, financial aid, and student support services, such as counseling, tutoring, mentoring, and academic advice. For several programs, these services are authorized along with numerous other program activities directed toward the improvement of

institutions and programs. We also identified two OESE programs and three OVAE programs that either have a similar purpose or one component of the program offers similar services to participants.

Table 2: Student Support for Postsecondary and Adult Education					
		ľ	2004		
Program Name ¹	Office	PO^{2}	Funding	Awards	
Student Support Services	OPE	TRIO	\$263,030,892	935	
McNair Postbaccalaureate Achievement	OPE	TRIO	\$42,092,721	179	
Historically Black Colleges and Universities	OPE	IDUE	\$222,119,992	97	
Historically Black Graduate Institutes	OPE	IDUE	\$53,099,851	18	
Educational Opportunity Centers	OPE	TRIO	\$48,971,567	139	
American Tribally Controlled Colleges and Universities	OPE	IDUE	\$23,286,792	35	
Alaska Native and Native Hawaiian Serving Institutions	OPE	IDUE	\$10,935,100	16	
Developing Hispanic Serving Institutions	OPE	IDUE	\$93,993,149	212	
				53 Strengthening 26 Planning	
Strengthening Institutions	OPE	IDUE	\$80,986,345	207 Continuation	
Alaska Native Education Program	OESE	AITQ	\$33,302,000	5	
Native Hawaiian Education Program	OESE	AITQ	\$32,302,000	10	
Tribally Controlled Postsecondary Vocational and					
Technical Institutions Program	OVAE		\$7,185,355	2	
Vocational Education – Grants to Native Americans					
and Alaska Natives	OVAE		\$14,937,595	31	
Vocational Education – Native Hawaiians	OVAE		\$2,987,519	1	
	Totals		\$929,230,878	1,966	

1. Data was obtained from the Department's ed.gov website; the Guide to U.S. Department of Education Programs dated 2004; or program officials in OPE, OESE, and OVAE.

2. Program Office (PO): Trio Programs (TRIO), Institutional Development and Undergraduate Education Programs (IDUE), Academic Improvement and Teacher Quality Programs (AITQ).

The 14 programs listed above have the same overall objective in providing educational services to program participants to assist in succeeding in postsecondary and adult education.

- The nine OPE programs provide educational services to disadvantaged students to encourage continuing on to a postsecondary institution. Many of the programs offer financial assistance to participants and assist students with basic college requirements. Many of these programs offering support services are aimed at specific-populations, such as African-American, Hispanic, American Tribal, Alaska Native, and Native Hawaiian.
- The two OESE programs focus on providing educational services that address the educational needs of Alaska Native and Native Hawaiian youths to further their education.
- The three OVAE programs geared at serving three specific target groups, Native Americans, Alaska Natives, and Native Hawaiians, provide support services to students choosing to attend a postsecondary vocational and technical institution.

Preparation of Students for Postsecondary Education

We identified four OPE programs with the purpose of providing educational services to elementary and secondary school students to prepare and encourage the students to complete

Table 3: Preparation of Students for Postsecondary Education							
Office	PO ²	2004 Funding	Awards				
OPE	TSD	\$298,230,000	317				
OPE	TRIO	\$274,097,258	763				
OPE	TRIO	\$32,812,036	127				
OPE	TRIO	\$144,230,198	469				
OESE	OME	\$7,884,808	18				
OESE	SASA	\$48,395,000	52				
OESE	OME	\$393,577,113	52				
OESE	AITQ	\$33,302,000	5				
OESE	AITQ	\$32,302,000	10				
OVAE	STE	\$3,628,563	23				
Totals		\$1,268,458,976	1,836				
	Office OPE OPE OPE OESE OESE OESE OESE OESE OVAE	Office PO ² OPE TSD OPE TRIO OPE TRIO OPE TRIO OPE TRIO OESE OME OESE SASA OESE OME OESE AITQ OESE AITQ OVAE STE	Office PO ² 2004 Funding OPE TSD \$298,230,000 OPE TRIO \$274,097,258 OPE TRIO \$32,812,036 OPE TRIO \$144,230,198 OESE OME \$7,884,808 OESE OME \$393,577,113 OESE OME \$33,302,000 OESE AITQ \$32,302,000 OVAE STE \$3,628,563				

high school and to go on to receive a postsecondary education. We also identified five OESE, and one OVAE program that either have a similar purpose or component.

1. Data was obtained from the Department's ed.gov website; the Guide to U.S. Department of Education Programs dated 2004; or program officials in OPE, OESE, and OVAE.

 Program Office: Teacher and Student Development Programs (TSD); TRIO Programs (TRIO), Office of Migrant Education (OME), Academic Improvement and Teacher Quality Programs (AITQ), Student Achievement and School Accountability Programs (SASA), and Secondary and Technical Education (STE).

- All four OPE programs provide educational services that promote academic preparation designed to increase the number of low-income students who are prepared to enter and succeed in postsecondary education. The programs offer very similar services including information on postsecondary education and funding opportunities, encouragement and assistance to complete high school, mentoring, and tutoring, and are aimed at disadvantaged youth in elementary and secondary schools.
- The OESE programs all contain segments that encourage graduation (or receipt of a GED) and enrollment in postsecondary education for specific sub-populations: migrant workers' children, Alaska Natives, Native Hawaiians, and youth in local and state institutions for neglected and delinquent youth.
- The single OVAE program provides similar services for students with aspirations to vocational and technical education programs.

In some cases, the individuals in the sub-populations covered under the OESE and OVAE programs would also be considered eligible under the OPE programs' definitions of eligible students.

Consequences of Multiple-Programs with Overlapping Objectives and Services

The multiple programs, all with their own legislation, regulations, program policies, applications, award competitions, monitoring, and reporting requirements are burdensome for the Department to administer. We noted little coordination between OPE, OESE, and OVAE grant programs. We suggest that the Department improve its coordination between programs within OPE and

throughout the Department. We also suggest that grant programs be realigned to administer like programs by the same office within the Department, and to work with Congress to consolidate or eliminate programs that have the same program objectives.

Multiple Programs Are Burdensome to Administer

The multiple programs provide numerous flexibilities in funding services to various entities and individuals. However, the multiple programs, each with their own legislation, regulations, program policy, application, award, and reporting requirements are burdensome for the Department to administer. Since 2002, the Office of Inspector General (OIG) has issued three internal reports and 24 recipient reports covering programs where we found non-compliance and poor program administration at the Department and individual grantees.² Past audit reports have shown that there is a need for the Department to increase its monitoring, provide more technical assistance, and clarify program guidance to reduce confusion and misinterpretation of policy guidelines. These findings were due in part to program staff not following prescribed policy and procedures, and not having controls in place to effectively administer their program. Program staff stated that their caseload and diverting staff to assist with other program award cycles were barriers to monitoring the grants as they desired.

This administrative burden is reflected in the Department's Report to Employees on Agency Results, July 2005, which reported, "... despite the tremendous growth in the size of ED programs over the past 25 years, the number of full-time equivalent ED staff reached a 25-year low ... in fiscal year 2004. Managing significantly greater resources with fewer people"

Eliminating or combining programs could help reduce the burden on program staff and reduce the amount of different, yet overlapping program guidance, award competitions, and other materials. Realignment of programs may also allow the Department to leverage or better use oversight resources. This may lead to increased efficiency and better use of the Department's resources in direct support of its mission.

More Coordination Needed Within OPE and With OESE and OVAE

There was little effort to coordinate between the programs, either within OPE itself, or with OPE and OESE or OPE and OVAE. In accordance with one purpose of the Department's mission: "to improve the coordination of federal education programs," coordinating OPE programs, along with programs administered in other Principal Offices, could help ensure efficient and effective use of taxpayer resources. All Principal Offices should coordinate programs offering similar services to meet the needs of all individuals seeking project services, and ensure that duplication does not exist by serving the same target group with like services. In some cases, effective coordination might require that programs be administered by another office.

The Talent Search and Gear Up grants in OPE are two of the more closely related programs within the Preparation of Students for Postsecondary Education grouping; however, they are not even administered by the same program office within OPE. Many Talent Search grantees also are administrating GEAR UP grants. However, there is no assurance that the programs are not over-serving one area while overlooking another altogether, and efforts to coordinate the award

² See Attachment B for a listing.

of the grants would be more difficult when they are administered out of two different program offices within OPE.

In the Teacher Quality and Professional Development group of programs, the largest grant programs by far are administered by OESE. In contrast, the largest OPE program, the Teacher Quality Enhancement Grant program, with a total of \$88,887,451 appropriated for FY 2004, was listed for termination in the Department's 2006 Budget request due to its lack of performance information and program management deficiencies.

The Department also recommended eliminating the GEAR UP, Upward Bound, and Talent Search Programs in its FY 2006 budget request. The Department's reasons for eliminating existing programs include indications that programs

- have achieved their original purpose,
- duplicate other programs,
- may be carried out with flexible state formula grant funds, or
- involve activities that are better or more appropriately supported through state, local, or private resources.

In administering programs, the flexibility and control to allocate funds to activities determined to best meet the needs of at-risk students should be a primary goal. Since OPE does not award discretionary grants by geographic location, the Department cannot be certain that all geographic areas are being served, or what portion of eligible populations have been over- or under-served by discretionary grant programs. Grant awards should be managed so that services are matched to the needs of various populations both within that program and among other programs with similar objectives.

The Department Should Continue to Work With Congress to Consolidate or Eliminate Overlapping Programs

As noted, the Department has made recommendations to eliminate some duplicative programs by recommending that the funding be discontinued. We also acknowledge that Congress sets the number and nature of the programs through legislation. Although the Department must administer all the programs enacted by Congress, we believe that OPE should increase its efforts to identify and inform Congress of inefficiencies and overlaps between programs and to identify those programs which, through consolidation or elimination could improve the efficiency and effectiveness of the Department in achieving its goals of academic excellence and expanded access to higher education.

Suggestions

We suggest that the Department consider:

1.1 Continuing its work with Congress to consolidate or eliminate programs that have the same or similar program objectives.

- 1.2 Realigning similar grant programs to be administered by the same office within the Department.
- 1.3 Improving coordination between OPE and other Department programs with the same or similar program objectives.
 - a. Such coordination may require the reassignment of administrative responsibilities between program offices within OPE or the transfer of programs between OPE, OESE, or OVAE.
 - b. The Department should explore creative ways to ensure that similar services offered to like populations be coordinated between the existing programs so that individuals and geographic areas are neither over- or under-served.
 - c. Other areas of coordination could include identifying overlapping areas wherever possible and ensuring consistent application of definitions, guidance, and other requirements to reduce the burden of Departmental policy on grant administrators and grant recipients.
 - d. The Department should encourage consolidation of reporting and similar requirements for recipients with multiple grants to reduce the administrative costs and enable more services to be provided to the intended beneficiaries.

OBJECTIVES, SCOPE, AND METHODOLOGY

The objectives of our review were to determine if OPE grant programs 1) have duplicative program objectives aimed at serving like target populations and areas; and 2) if grant programs administered by other Department offices contain program objectives that overlap with OPE grant programs.

To achieve the review objectives, we

- Conducted interviews with program directors and staff of selected programs from OPE, OESE, and OVAE.
- Obtained and reviewed program data.
- Identified and selected all discretionary and formula OPE grant programs that offer similar services to a general population or area. (Programs that had unique program purposes were not selected.)
- Selected OESE programs that had a similar program objective to OPE programs.
- Selected OVAE programs that had a similar program objective to OPE programs.
- Reviewed legislation and regulations governing each of the selected OPE programs.
- Reviewed prior issued OIG audit reports pertaining to selected programs from each of the three Principal Offices.
- Reviewed grant application instructions, the 2004 Program Assessment Rating Tool, the Department's FY 2005 Performance Plan, and the Department's Strategic Plan 2002-2007.

We assigned the programs selected to eight different categories of related program purposes: Teacher Enhancement, Postsecondary Student Services, Postsecondary Student Aid, Postsecondary Institutions, Elementary and Secondary, International, Curriculum, and Training Programs (See Attachment A). Because some individual programs have multiple goals and objectives, these programs may be included in more than one category.

We compared all programs selected from OESE and OVAE for similarities between services, target groups, and target areas and compared those programs to OPE programs. We did not compare programs selected within OESE or OVAE, nor did we compare selected programs between OESE and OVAE. Programs selected from OESE and OVAE were only compared to OPE programs that were selected for our review.

We relied, in part, on computer-processed data to determine the number of grant programs in each of the three Principal Offices: OPE, OESE, and OVAE. Based on our assessments, we concluded that the data used was sufficiently reliable for the purpose of our review. We did not assess the adequacy of OPE, OESE, or OVAE controls over the programs selected for review.

Fieldwork was performed at the selected OPE, OESE, and OVAE program offices during the periods of December 8-10, 2004, and January 10-14, 2005. We conducted an exit conference with officials from OPE on October 6, 2005. Our review focused on the FY 2003-2004 individual program objectives. Our review was conducted in accordance with generally accepted government auditing standards appropriate to the scope of the review described above.

ADMINISTRATIVE MATTERS

Statements that managerial practices need improvements, as well as other conclusions and suggestions in this report, represent the opinions of the Office of Inspector General.

In accordance with the Freedom of Information Act (5 U.S.C. § 552), reports issued by the Office of Inspector General are available to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.

We appreciate the cooperation given us during this review. If you have any questions, please contact Richard J. Dowd, Regional Inspector General for Audit, at (312) 886-6503.

Sincerely,

/s/ Helen Lew Assistant Inspector General for Audit Services

Attachment A

Grant Programs Within OPE With Overlapping Purposes and Services, Including OESE and OVAE Programs Which Overlap OPE Grant Programs

Teacher Quality and Professional Development	Student Support for Postsecondary and Adult Education
OPE PROGRAMS	OPE PROGRAMS
Demonstration Projects to Ensure Students with	
Disabilities Receive a Quality Higher Education	
\$6,912,971	*Student Support Services \$263,030,892
Preparing Tomorrow's Teachers to Use Technology	
(no funding in 2004)	McNair Postbaccalaureate Achievement \$42,092,721
Teacher Quality Enhancement Grants (States,	*Historically Black Colleges and Universities
Partnerships, Recruitment) \$88,887,451	\$222,119,992
*Fulbright-Hays Faculty Research Abroad Fellowship	
Program \$1,385,649	*Historically Black Graduate Institutions \$53,099,851
*Fulbright-Hays Seminars Abroad-Bilateral Projects	
\$2,200,000	Educational Opportunity Centers \$48,971,567
*Alaska Native and Native Hawaiian Serving	*American Tribally Controlled Colleges and
Institutions \$10,935,100	Universities \$23,286,792
*Strengthening Institutions \$20,026,245	*Alaska Native and Native Hawaiian Serving
*Strengthening Institutions \$80,986,345	Institutions \$10,935,100
OESE PROGRAMS	*Developing Hispanic-Serving Institutions \$93,993,149
Improving Teacher Quality State Grants	ψ,5,5,5,147
\$2,930,126,132	*Strengthening Institutions \$80,986,345
*Enhancing Education through Technology Program	
\$691,840,913	OESE PROGRAMS
	*Alaska Native Education Program \$33,302,000
	*Native Hawaiian Education Program \$32,302,000
	OVAE PROGRAMS
	*Tribally Controlled Postsecondary Vocational and Technical Institutions Program \$7,185,355
	Vocational Education - Native Hawaiians \$2,987,519
	Vocational Education - Grants to Native Americans
	and Alaska Natives \$14,937,595

Postsecondary Student Aid	Postsecondary Institutions	Preparation of Students for Postsecondary Education
OPE PROGRAMS	OPE PROGRAMS	OPE PROGRAMS
*Gaining Early Awareness and Readiness for Undergraduate Programs \$298,230,000	*Historically Black Colleges and Universities \$222,119,992	*Gaining Early Awareness and Readiness for Undergraduate Programs \$298,230,000
B.J. Stupak Olympic Scholarships \$988,135	*Strengthening Institutions \$80,986,345	Upward Bound \$274,097,258
Robert C. Byrd Honors Scholarship \$40,758,100	*Developing Hispanic-Serving Institutions \$93,993,149	Upward Bound Math & Science \$32,812,036
*Student Support Services \$263,030,892		*Talent Search \$144,230,198
Thurgood Marshall Legal Educational Opportunity (not funded in 2004)	*Historically Black Graduate Institutions \$53,099,851	OESE PROGRAMS
Graduate Assistance in Areas of National Need \$30,616,292	*American Tribally Controlled Colleges and Universities \$23,286,792	Prevention and Intervention Programs for Children and Youths Who Are Neglected, Delinquent, or At Risk \$48,395,000
Jacob K. Javits Fellowship Program \$9,876,383	*Alaska Native and Native Hawaiian Serving Institutions \$10,935,100	Education of Migratory Children \$393,577,113
Foreign Language and Area Studies Fellowship \$26,960,000 Child Care Access Means Parents in	*Fund for the Improvement of Postsecondary Education- Comprehensive Program \$11,100,000	Migrant Education - High School Equivalency Program \$7,884,808 *Alaska Native Education Program
School Program \$16,098,455	OVAE PROGRAMS	\$33,302,000
*Fulbright-Hays-Doctoral Dissertation Research Abroad \$4,440,379	*Tribally Controlled Postsecondary Vocational and Technical Institutions Program \$7,185,355	*Native Hawaiian Education Program \$32,302,000
*Alaska Native and Native Hawaiian Serving Institutions \$10,935,100		OVAE PROGRAMS
OESE PROGRAMS		*Tech Prep Demonstration Program \$3,628,563
Migrant Education-College Assistance Migrant Program \$15,667,075		
OVAE PROGRAMS		
*Tribally Controlled Postsecondary Vocational and Technical Institutions Program \$7,185,355		

International	Curriculum	Training		
70PE PROGRAMS	OPE PROGRAMS	OPE PROGRAMS		
	Eisenhower Regional Mathematics			
American Overseas Research Centers		TRIO Dissemination Partnership		
\$1,000,000		\$4,374,000		
*Fulbright-Hays Faculty Research	*American Tribally Controlled			
Abroad Fellowship Program		Training Program for Federal		
\$1,385,649		TRIO Programs \$6,000,000		
*Fulbright-Hays Group Projects	*Business and International Education			
Abroad \$4,312,450	Program \$4,490,000			
*Fulbright-Hays Seminars Abroad	Centers for International Business			
Bilateral Projects \$2,200,000	Education \$10,700,000			
[*] Fulbright-Hays Doctoral Dissertation	*Fulbright-Hays Group Projects			
Research Abroad \$4,440,379	Abroad \$4,312,450			
*Business and International Education	International Research and Studies			
Program \$4,490,000	\$5,620,900			
	*Language Resource Centers			
\$1,639,330	\$4,850,000			
	*Technological Innovation &			
	Cooperation for Foreign Information			
	Access \$1,700,000			
	Undergraduate International Studies			
	and Foreign Language Program			
	\$4,490,000			
	*Alaska Native and Native Hawaiian			
	Serving Institutions \$10,935,100			
	*Developing Hispanic-Serving			
	Institutions \$93,993,149			
	OESE PROGRAMS			
	*Alaska Native Education Program			
	\$33,302,000			
	*Native Hawaiian Education Program			
	\$32,302,000			
	*Mathematics and Science			
	Partnerships \$149,115,000			
	*Enhancing Education through			
	Technology Program \$691,840,913			
	OVAE PROGRAMS			
	*Pacific Vocational Education			
	Improvement Program \$1,510,015			
	*College and Career Transitions			
	Initiative			
	*Vocational Education-Basic Grants			
	to States \$1,168,239,440			
2004 Funding shown				

Attachment B

4 1.	Office	of inspecto	r General Issued Reports	D 11
Audit Control Number	Title	Date Issued	Issues Identified	Recommended Recovery Amount
		De	epartment Audits	
A07E0009	Talent Search Program at the U.S. Department of Education	02/16/05	The report stated that the TRIO Office did not maintain sufficient internal control over Talent Search participant numbers because it did not (i) properly maintain the records and procedures needed to readily determine the correct number of participants planned or (ii) provide the monitoring and policy guidance needed to insure accurate reporting of participants served. It was found that the Department might be using overstated Talent Search participant numbers for assessing grant performances and reporting to Congress and the general public.	\$0
A07A0033	Audit of Gaining Early Awareness and Readiness for Undergraduate Programs	06/07/02	The GEAR UP audit report found that the program did not establish and follow management controls necessary to assure that it administered the program in accordance with legislative, regulatory and internal administrative requirements. Specifically, the audit found that the Department did not assure that: GEAR UP officials informed GPOS when changes were made with GEAR UP program staff and officials holding warranty authority; GEAR UP program staff followed the Department's Technical Review Plan in reviewing budget data submitted by applicants prior to awarding grant funds; GEAR UP officials established and implemented a monitoring plan as prescribed in the Technical Review Plan; GEAR UP program staff completed the necessary steps to determine eligibility prior to awarding grant funds; and GEAR UP program staff adequately reviewed the completed technical review forms and panel summary sheets for completion and mathematical accuracy as required by the Technical Review Plan.	
A0790034	Department Controls Over TRIO Grantee Monitoring	01/04/02	The audit disclosed that the Department needs to improve its oversight of TRIO grantees. Specifically, the Department needs to ensure that 1) TRIO grantees are effectively monitored for compliance with federal requirements, 2) internal controls are strengthened to help prevent program abuse, resolve compliance problems, and enforce corrective actions, and 3) reporting instructions are clarified to ensure the integrity of national performance information.	\$0
				Grantee Audits
A05D0041	University of Illinois at Chicago's Upward Bound Project	12/20/04	The audit disclosed that UIC misrepresented the achievement of the Upward Bound project's objectives because it did not have documentation supporting the achievements as reported to the Department. In addition, UIC (1) did not serve only ineligible participants, (2) did not appropriately account for grant funds, (3) could not support all of its expenditures, and (4) charged unallowable costs to the grant.	

A05D0017	The University of Illinois at Chicago's Gaining Early Awareness and Readiness for Undergraduate Programs Project	01/14/04	The audit disclosed that UIC did not comply with the terms of its agreement with the Department. UIC failed to show that its GEAR UP project provided services to 1,130 participants from its cohort during each of the first three years of the grant (September 1, 1999, through August 31, 2002). In addition, UIC and its partnership failed to provide \$990,847 in required non-federal matching contributions for the first three years of the grant.	\$1,018,212
A06D0015	New Orleans Educational Talent Search Program, Inc	10/21/04	New Orleans Educational Talent Search Program, Inc., materially failed to comply with the Higher Education Act of 1965 (HEA), as amended, regulations governing the Talent Search Program, and its approved grant application. During the period September 1, 1998, through December 31, 2002, NOETSP did not (1) comply with the grant performance requirements, and (2) properly account for \$1,937,980 in Talent Search Program funds. Specifically, NOETSP did not (1) document needs assessments for its participants, including whether the students were low-income or prospective first- generation college students, and (2) maintain a record of services provided and educational progress made by each participant as a result of the services.	\$1,937,98(
A04C0019	Stillman College's Administration of the Federal TRIO Programs Needs Improvement	10/15/03	The audit covered the following TRIO programs; Student Support Services (SSS), Upward Bound (UB), Upward Bound Young Scholars (UBYS), and Upward Bound Math & Science (UBMS). The audit found that the college: 1) had drawn down TRIO funds in excess of its program expenditures totaling \$313,545 for three TRIO programs (SSS, UBYS, and UBMS); 2) lacked proper accounting controls over recording and reporting TRIO program expenditures and reporting expenditures in the financial statements; 3) did not maintain an adequate inventory of computer equipment purchased with TRIO funds, and 4) SSS program services were provided to non-SSS participants.	\$313,545
A07C0031	Audit of the Talent Search Program at Luther College	03/28/03	Luther College did not always administer its Federal Talent Search grant in accordance with applicable law and regulations. For the grant period September 1, 2001, through August 31, 2002, it was estimated that Luther College served only 363 of the 625 participants it was funded to serve, which is significantly less than the 600 participants required of Talent Search grantees.	\$219,567
A07D0001	The Talent Search Program at the University of New Hampshire	01/15/04	The University did not always administer its Talent Search grant in accordance with applicable regulations or its Departmental agreement. The University could not provide documentation for all services it claims to have provided to participants. For the grant period September 1, 2001, through August 31, 2002, we estimated that the University might have served fewer than the 1,150 participants it was funded to serve.	\$(
A07D0009	The Talent Search Program at Wahupa Educational Services	11/25/03	Wahupa did not always administer its Talent Search grant in accordance with applicable law and regulations. For the grant period September 1, 2001, through August 31, 2002, it was estimated that Wahupa served 1,702 allowable participants of the 2,300 participants it was funded to serve. Wahupa did not serve the participant number it reported on the APR, and less than two-thirds of its Talent Search participants were low-income individuals who were potential first-generation college students.	\$122,900

A07D0015	The Talent Search Program at Communities in Schools of San Antonio	01/29/04	CIS did not fully comply with the HEA and specific regulations or follow its own grant proposal in meeting its target population. The grant project did not serve the minimum required (600) participant population for an eligible Talent Search program. For the September 1, 2001, through August 31, 2002, budget period, it was estimated that out of the 601 participants claimed as served, only 481 were allowable participants.	\$298,349
A07D0024	Talent Search Program at LULAC National Educational Service Centers, Inc.	06/18/04	LNESC did not always administer its grant in accordance with the law and regulation governing the documentation of participant eligibility. As a result, LNESC overstated Talent Search participants served in its APR submitted to the Department for the September 1, 2001, through August 31, 2002, budget period.	\$(
A07D0002	The Talent Search Program at Case Western Reserve University	07/11/03	Case Western Reserve University did not always administer its Federal Talent Search grant in accordance with applicable law and regulations. For the grant period September 1, 2001, through August 31, 2002, we estimate that CWRU served only 399 of the 600 participants, the minimum number of participants required of TA grantees, it was funded to serve.	\$212,428
X06D0021	State Education Agencies (Texas, Florida, Kansas, and California) and their sub- grantees, and to identify how the Office of Migrant Education can improve the Migrant Education Program	09/30/03	It was found that none of the four States (1) established and implemented appropriate procedures to identify and target services to migratory children who are failing, or most at risk of failing, to meet State standards, and whose education was interrupted during the regular school year, and (2) established procedures to report to the Department an accurate number of "Priority for Services" migratory children served. As a result, the Department could not determine whether the \$212.2 million in Migrant Education Program funds received by these four States in FY 2001 were used to provide services to Priority for Services migratory children before services were provided to other migratory children.	\$0
A05D0037	Future Teachers of Chicago, Illinois Teacher Recruitment Grant	03/23/04	The audit disclosed that Future Teachers did not expend grant funds in accordance with Title II of the Higher Education Act of 1965, as amended, applicable regulations, and terms of the Grant award. Future Teachers lacked the ability to adequately administer the grant because it was not familiar with program requirements and, as a result, did not establish or implement an adequate financial management system and adequate management controls. During the period October 1, 2002, through June 30, 2003, Future Teachers charged the Grant for costs it did not adequately support and for unallowable costs, and maintained excess cash.	\$365,296
A06E0015	The Dallas Independent School District's (DISD) administration of the Teaching American History Grant	09/16/04	The audit disclosed that although DISD properly accounted for and used grant funds in accordance with applicable federal laws, regulations, grant terms, and cost principles during the first two years of the grant, DISD did not obtain the required prior approval for a change in key personnel for the approved grant. Consequently, DISD disbursed \$205,000 in grant funds to the new unapproved and, therefore, ineligible grant partner.	\$205,000
A05E0002	The University of Illinois at Chicago's (UIC) Student Support Services program	12/15/04	The audit disclosed that UIC (1) failed to provide evidence of fulfillment of assurances, (2) did not accurately report the accomplishments of its SSS program to the Department, (3) charged unallowable costs to the grant, and (4) could not support all of its personnel expenditures.	\$260,050

\$76,15	The audit found that the College drew down more Title III funds than it expended for program activities and did not inform the Department of changes in key personnel.	12/30/03	Stillman College's Administration of the Title III, Part B, Strengthening Historically Black Colleges and Universities Program	A04D0013
\$28,08	KSU generally met the Title III, Part B, cash management requirements, but it did not always meet the record keeping requirements for grant expenditures. KSU accounting controls did not always ensure that grant expenditures were fully documented and supported.	03/12/03	Kentucky State University's Administration of the Title III, Part B, Strengthening Historically Black Colleges and Universities Program	A04C0014
\$	The objective of the audit was to determine if the College expended Federal Strengthening Institutions grant funds in accordance with its grant agreement, federal law and regulations, and applicable cost principles for the two years ended September 30, 2004. There were no findings that required resolution.	04/04/05	College of Lake County Community College District No. 532 (College) Strengthening Institutions grant funds	A05F0011
\$3,21	The audit disclosed that GSU 1) operated a financial management system that was inadequate to completely and accurately account for Student Support Services and Upward Bound funds and inadequate to compare outlays with approved budgeted amounts for each award year, 2) did not accurately report the accomplishments of its Student Support Services and Upward Bound programs, 3) did not maintain adequate support for all Student Support Services and Upward Bound expenses, and 4) incorrectly calculated indirect costs.	08/18/03	Governors State University's (GSU) administration of its Student Support Services and Upward Bound programs	A05C0028
\$274,49	The audit disclosed that UIC misrepresented its UBMS project's accomplishments to the Department. UIC did not maintain documentation supporting that it achieved the project's objectives as reported to the Department, served ineligible participants and did not provide all required services, did not appropriately account for grant funds, could not support all its expenditures, and charged unallowable costs to the grant.	12/17/04	University of Illinois at Chicago's (UIC) Upward Bound Math and Science (UBMS) project	A05E0018
\$21,76	Magdalena did not properly account for and use GEAR UP partnership grant funds in accordance with all applicable regulations, grant terms, and cost principles. Specifically, Magdalena awarded GEAR UP scholarships to ineligible students, charged the grant for fund raising costs, used grant funds for expenditures that were not adequately supported, and did not establish a separate trust fund to safeguard GEAR UP scholarship funds.	03/30/04	Magdalena Municipal Schools' (Magdalena) administration of the Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant	A06D0027
\$380,40	The Foundation did not meet the required matching contributions for any of the four years covered by the review because the Foundation did not have the required documentation for the claimed contributions. Further, the Foundation did not use and properly account for the GEAR UP grant funds in accordance with federal regulations.	06/17/04	California State University, Fresno Foundation's Administration of GEAR UP Partnership Grant	A09D0032
\$1,822,86	The audit found that VCC officials did not administer its GEAR UP projects in accordance with legislative, regulatory, and administrative requirements for non-federal match. Further, VCC did not maintain adequate documentation to support the required match, claimed facilities and equipment costs were improperly calculated, and matching claims included unallowable, unallocable, and unreasonable room usages.	05/08/03	Audit of Valencia Community College's Gaining Early Awareness and Readiness for Undergraduate Programs Matching Requirement	A07B0011

A09B0026	Audit of Delaware State University's Administration of the Title III Strengthening HBCU Program	07/11/02	The University did not 1) promptly account for HBCU Program funds drawn down for the Endowment Challenge Program activity, 2) promptly provide matching funds for the HBCU Program funds, and 3) deposit and invest the endowment fund corpus in a timely manner. In addition, the University reported inaccurate information on the status of the Endowment Challenge Program activity to the Department in its continuation grant applications and annual performance reports. Further, the University did not adequately account for the endowment funds established with Title III HBCU Program and Endowment Challenge Grant Program funds. Lastly, the University charged unallowable and unsupported costs to the program.	\$0
A04D0001	North Alabama Center for Educational Excellence's Administration of the TRIO Programs Needs Improvement	11/24/03	NACEE violated the conflict of interest regulations regarding payment for rental space at its central office, used TRIO funds to pay performance awards to employees without an established institutional award plan, lacked documentation for one expenditure, failed to maintain activity reports to support the Executive Director's TRIO salary distribution, and did not adequately support TRIO program achievements reported in the 2000-2001 and 2001-2002 performance reports.	\$877,384

Auditee Response

Attachment C

February 10, 2006

Ms. Helen Lew Assistant Inspector General for Audit Services Office of the Inspector General U.S. Department of Education 400 Maryland Avenue, SW Washington, DC 20202

Dear Ms. Lew:

Thank you for the opportunity to comment on the Office of Inspector General's (OIG's) Draft Management Information Report, "Overlapping Services in the Department of Education's Office of Postsecondary Education Programs," (ED-OIG/X07F0002) dated December 29, 2005. The objectives of the review were to determine: 1) if Office of Postsecondary Education (OPE) grant programs have duplicative program objectives aimed at serving like target populations and areas; and 2) if grant programs administered by other U.S. Department of Education (Department) offices contain program objectives that overlap with those of OPE grant programs.

The report summarizes the results of the audit of 42 discretionary and formula grant programs administered by OPE and funded in FY 2003-2004, which OIG believes may overlap in some way with 15 Office of Vocational and Adult Education (OVAE) and 13 Office of Elementary and Secondary Education (OESE) grant programs. The Department concurs with the report's finding that some of the 42 programs reviewed by OIG overlap with or are duplicative of other Department programs and should be reformed or eliminated. Indeed, the President's budget has proposed to replace a number of the programs that are directed at preparing students for postsecondary education with a more comprehensive approach to improving high school education and has included other recommendations for eliminating other duplicative programs. As noted below, the Department has also made some organizational changes that should facilitate management of similar programs. Further analysis and discussion are needed to determine whether there are other options that should be considered for enhancing program administration through reorganization or better coordination.

In the following paragraphs, the Department would like to respond directly to the specific recommendations in this report:

1.1 Consider working with Congress to consolidate or eliminate programs that have the same or similar program objectives.

The Department concurs with this suggestion and, for a number of years, the Administration had proposed elimination of duplicative or otherwise unneeded programs. In the fiscal year 2006 budget request, we recommended elimination of 48 Department programs, and Congress responded by eliminating funding for five of them. In the newly announced fiscal

year 2007 budget, we recommended the elimination of 42 programs. Proposed terminations included B.J. Stupak Olympic Scholarships, Byrd Honors Scholarships, Teacher Quality Enhancement, Demonstration Projects to Ensure Students with Disabilities Receive a Quality Higher Education, and Thurgood Marshall Legal Educational Opportunity programs, which are administered by OPE, and the Enhancing Education Through Technology Program, which is administered by OESE, because they are duplicative of other programs. Other programs were also proposed for elimination because they would be replaced by the more comprehensive High School Reform initiative. These programs included Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP), the TRIO Talent Search Program, TRIO Upward Bound, and TRIO Upward Bound Math/Science, which are administered by OPE, and the Vocational Education State Grants, Vocational Education Grants to Native Americans and Alaskan Natives, and Vocational Education -- Native Hawaiians programs, which are administered by OVAE. In addition, the Administration previously proposed the elimination of the Preparing for Tomorrow's Teachers to Use Technology program, and Congress terminated funding.

The Department continues to conduct reviews on various programs using the Office of Management and Budget's Program Assessment Rating Tool. This process continues to serve as a mechanism for the Department to examine the effectiveness of its programs and consider opportunities for the consolidation and elimination of programs, taking into account Administration priorities and data regarding program effectiveness.

1.2 Consider realigning similar grant programs to be administered by the same office within the Department.

The Department concurs, in general, with this suggestion and continues to assess program goals and objectives, realigning similar programs when appropriate. However, the Department does not believe that realigning program staff at the present time would necessarily increase efficiency of its operations. In 2005, the Department reorganized to streamline the agency's functions, clarify roles and responsibilities, and integrate policy development, program implementation, and communication. This should assist the Department as it reviews its grant programs for additional opportunities to increase efficiency and effectiveness.

To promote coordination among OPE programs, all but one of the higher education grant programs are administered under the Deputy Assistant Secretary for Higher Education Programs (HEP). The HEP office coordinates program policy, planning, and implementation. Program managers and staff interact on a daily basis. Additionally, OPE has increased the use of electronic resources, such as the Grants.gov Web site, resulting in improved services and reduced burden on applicants.

In addition, the Administration has requested funding for the Tribally-Controlled Postsecondary Vocational and Technical Institutions program, which is currently administered by OVAE, under OPE's Higher Education account and has recommended that Congress reauthorize the program as part of the Higher Education Act.

1.3 Consider improving coordination between OPE and other Department programs with the same or similar program objectives.

The Department recognizes the benefits of coordination and routinely explores ways to strengthen coordination among various OPE programs with similar objectives that are administered by other program offices. For example, there has been extensive coordination between OPE and OESE on the issue of highly qualified teachers and the Secretary's annual reports under Title II of the Higher Education Act. One outcome of this cooperation has been the adoption of common performance measures for programs with comparable objectives.

OPE administers 47 discretionary and formula grant programs that have a broad range of objectives, target populations, and grant recipients. OPE will continue its current efforts to look for opportunities to streamline programs, maximize electronic capabilities to reduce burden, and standardize program administration.

The Department will provide technical corrections and clarifications separately for you to consider as you complete the final version of your report. We hope that this response will further your efforts to support the Department goals of improving the management of Federal resources and strengthening overall accountability.

Sincerely,

Raymond Simon Deputy Secretary David Dunn Acting Under Secretary

 cc: Hudson La Force, Senior Counselor to the Secretary Sally Stroup, Assistant Secretary, Office of Postsecondary Education Henry Johnson, Assistant Secretary, Office of Elementary and Secondary Education
 Beto Gonzalez, Acting Assistant Secretary, Office of Vocational and Adult Education