
Audit of New York State Education Department's Reading First Program

FINAL AUDIT REPORT



ED-OIG/A02G0002
November 2006

Our mission is to promote the efficiency, effectiveness, and integrity of the Department's programs and operations.



U.S. Department of Education
Office of Inspector General
New York, New York

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November 3, 2006

Mr. Richard P. Mills
Commissioner of Education
New York State Education Department
Education Building
89 Washington Avenue
Albany, NY 12234

Dear Commissioner Mills:

Enclosed is our final audit report, Control Number ED-OIG/A02G0002, entitled *Audit of New York State Education Department's Reading First Program*. This report incorporates the comments you provided in response to the draft report. If you have any additional comments or information that you believe may have a bearing on the resolution of this audit, you should send them directly to the following Education Department official, who will consider them before taking final Departmental action on this audit:

Henry L. Johnson
Assistant Secretary
Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

It is the policy of the U. S. Department of Education to expedite the resolution of audits by initiating timely action on the findings and recommendations contained therein. Therefore, receipt of your comments within 30 days would be appreciated.

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General. Determinations of corrective action to be taken, including the recovery of funds, will be made by the appropriate Department of Education officials, in accordance with the General Education Provisions Act.

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.

Sincerely,

/s/
Daniel P. Schultz
Regional Inspector General for Audit

Enclosure

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EXECUTIVE SUMMARY

The objectives of our audit were to determine whether the New York State Education Department (NYSED) (1) developed and used criteria for selecting the scientifically based reading research (SBRR) programs in accordance with laws, regulations, and guidance; and (2) approved the local education agencies (LEAs) applications in accordance with laws, regulations, and guidance. Our audit period was May 1, 2002, through September 30, 2005.

The U.S. Department of Education Office of Elementary and Secondary Education (OESE) awarded NYSED \$221.7 million in Reading First funds during the audit period. We judgmentally selected the New York City Department of Education (NYCDOE) and Yonkers Public Schools (Yonkers) in our initial test sample of NYSED LEAs for the Reading First program. As a result of improper use of priority points in the approval of the NYCDOE Reading First application, we also judgmentally selected all NYSED LEAs that received less than 75 points from the expert review team.

We found that NYSED generally developed and used criteria for selecting the SBRR programs in accordance with the law as interpreted by the U.S. Department of Education (ED). However, we found that NYSED did not approve LEA applications in accordance with laws, regulations, and guidance. Specifically, NYSED could not provide support that the 66 approved LEAs, which received \$216 million in Reading First funds, met requirements of the Elementary and Secondary Education Act, as amended by the No Child Left Behind Act of 2001 (ESEA). NYSED also inappropriately used priority points to approve 9 of the 66 LEAs that received \$118 million in Reading First funding. Furthermore, NYSED did not follow Federal record retention requirements.

We recommend that the Assistant Secretary for OESE require NYSED to:

- Provide support to demonstrate that the reading programs at each of the 66 LEAs awarded Reading First subgrants met the seven ESEA required activities or return the unsupported awards, take appropriate action to protect the balance of funds that NYSED awards to the LEAs, and maintain supporting documentation for the grant award process in accordance with Federal laws and regulations;
- Utilize priority points in accordance with the requirements of the ESEA, ensure that all Reading First applications are scored correctly, and return the \$118 million of unallowable Reading First funds; and
- Determine whether any conflict of interest existed for the two expert reviewers whose Conflict of Interest Statements were missing and report any necessary corrective actions, and ensure that Reading First expert reviewers provide Conflict of Interest Statements for each Cohort prior to reviewing applications.

We provided a draft of this report to NYSED. In its response dated September 21, 2006, NYSED concurred with recommendations 1.2, 1.3, 2.1, 2.2, 3.1, and 3.2. NYSED disagreed with recommendation 1.1. NYSED stated that it provided sufficient support for the funding of the 66 LEAs. NYSED strongly disagreed with recommendation 2.3, stating that ED's approval

of the LEA application process, advice from ED's contractor, and the rigorous competitive process support each LEA that received funding met the requirements of ESEA. OIG's findings and recommendations, except for recommendation 1.1, which OIG revised, remain unchanged. We have summarized NYSED's comments and our response after each finding. A copy of NYSED's comments and all supporting documentation is attached.

BACKGROUND

ESEA, signed into law on January 8, 2002, established the Reading First program. The Reading First program provides assistance to State educational agencies (SEA) and LEAs to ensure that every student can read at grade level or above no later than the end of grade three. Funds are dedicated to help States and LEAs eliminate the reading deficit by establishing high-quality, comprehensive reading instruction in kindergarten through grade three. The total appropriation for the Reading First Program was \$993.5 million for award year 2003 and \$1.024 billion for award year 2004. The program is designed to develop, implement, and provide professional development for teachers using SBRR programs and to ensure accountability through ongoing, valid, and reliable screening, diagnostic, and classroom-based assessment.¹

An SEA that desires to receive a Reading First grant must submit an application to the Secretary of ED. SEA Reading First grant applications are evaluated by a panel of experts convened by the Secretary, in consultation with the National Institute for Literacy. SEAs can receive funds for a six-year period. SEAs awarded subgrants to LEAs on the basis of a competitive process.

NYSED submitted its first application in June 2003, and after two revisions it was approved in September 2003.² For the six-year award period, NYSED expects to receive approximately \$460.8 million in Reading First funds, subject to the State's successful implementation of the program and Congressional appropriations.

NYSED awarded \$216 million of Reading First grants to 66 LEAs for fiscal years (FYs) 2004 through 2006. NYSED awarded Reading First subgrants to eligible LEAs through a competitive process based on both need and capacity. According to NYSED's approved Reading First application, to be considered eligible for funding, an LEA application must: (1) receive a final score of 75 points or greater, including bonus points; (2) be rated "Meets Standards" or "Exemplary" for all criteria; and (3) demonstrate commitment to implementing the Reading First program in accordance with Federal and State guidelines. Although NYSED's expert reviewers scored the LEA applications, it was NYSED's responsibility to make the final determinations of which of the LEAs would receive Reading First subgrants.

NYSED had two subgrant award rounds during our audit period, Cohorts A and B. NYSED determined that 135 LEAs were eligible to apply for the Reading First program during the first

¹ SBRR is defined as research that applies rigorous, systematic, and objective procedures to obtain valid knowledge relevant to reading development, reading instruction, and reading difficulties; and includes research that employs systematic, empirical methods that draw on observation or experiment, involves rigorous data analyses that are adequate to test the stated hypotheses and justify the general conclusions drawn, relies on measurements or observational methods that provide valid data across evaluators and observers and across multiple measurements and observations, and has been accepted by a peer-reviewed journal or approved by a panel of independent experts through a comparably rigorous, objective, and scientific review.

² During the process of awarding Reading First funds to SEAs, ED's expert review panel identified three areas of NYSED's application that did not meet standards. There was no additional information provided, either by ED or NYSED, to show whether these issues were resolved prior to ED's approval of NYSED's application. This finding, however, was included in a separate Final Inspection Report titled *The Reading First Program's Grant Application Process*, I13F0017, dated September 2006 issued to ED.

round, Cohort A. Only the LEAs that applied for and were subsequently denied Reading First subgrants during this round were allowed to reapply for the second round, Cohort B. Of the 135 eligible LEAs, 86 applied and 66 were awarded Reading First subgrants in Cohorts A and B. The process for awarding funding for a third round, Cohort C, began in February 2006. New York State Comptroller's office directed NYSED to give priority, in Cohort C, to LEAs that did not apply during the first round (Cohort A) and were not given the opportunity to apply during the second round (Cohort B).

On December 16, 2005, we issued an Interim Audit Memorandum (IAM), ED-OIG/E02-G0003, to inform the OESE that NYSED inappropriately awarded over \$75 million in Reading First funds to NYCDOE, which had drawn down approximately \$61 million during our audit period. Additionally, on March 20, 2006, we issued an IAM, ED-OIG/E02-G0006, stating that: (1) ED awarded NYSED approximately \$221.7 million in Reading First funds during our audit period, despite ED's expert review panel identifying three unresolved areas in NYSED's application; (2) NYSED awarded \$184 million of Reading First grants to 66 LEAs without providing sufficient support that the LEA applications met the Reading First requirements of the ESEA; and (3) NYSED improperly used priority points to meet NYSED's minimum scoring level to approve 9 LEA applications.

OESE responded that it immediately contacted appropriate personnel at NYSED regarding the matters reported in the IAMs. OESE also stated that NYSED would provide additional information that would support its award of the subgrants. To date, OIG has not received any additional documents that support NYSED's awards of the subgrants.

AUDIT RESULTS

We found that NYSED generally developed and used criteria for selecting SBRR programs in accordance with the law as interpreted by ED.³ NYSED required LEAs to use Reading First criteria and the Simmons-Kame'enui, *A Consumer's Guide to Evaluating a Core Reading Program Grades K-3: A Critical Elements Analysis* for evaluating a comprehensive reading program as appropriate for Reading First.

However, NYSED did not approve LEA applications in accordance with laws, regulations, and guidance. Specifically, NYSED could not provide support for subgrants it awarded and inappropriately used priority points to award subgrants to nine LEAs. Furthermore, NYSED did not follow Federal record retention requirements.

FINDING NO. 1 – NYSED Could Not Provide Support for \$216 Million in Reading First Subgrants

NYSED awarded \$215,832,254 to 66 LEAs, but it did not provide sufficient support that NYSED or its expert review teams determined that the Reading First requirements of ESEA were met. Based on the methodology used to score the applications and NYSED's destruction of key documents, we could not determine that approved LEAs met all activities required for a Reading First subgrant.

According to ESEA § 1202 (c)(7)(A), an LEA that receives a Reading First subgrant, shall use the funds to carry out seven required activities. In addition, ESEA § 1202 (c)(4) states that to be eligible to receive a subgrant, an eligible LEA shall submit an application to the SEA at such time, in such manner, and containing such information as the SEA may reasonably require.

NYSED incorporated the seven ESEA-required activities, along with its additional requirements, within its Reading First rubric. This included the requirement that an LEA application be scored at a minimum of 75 points and be rated "Meets Standards" or "Exemplary" for each section of the rubric by NYSED's expert review team in order to be approved. Under NYSED's scoring, an LEA could receive a maximum of 80 points for addressing components listed under "Meets Standards" and 20 points for addressing components listed under "Exemplary." (See Enclosure 1) However, the rubric was insufficient to support that LEA applications met all the ESEA requirements.

NYSED's Reading First rubric did not adequately document that requirements were met because each individual bulleted item in a category was not assigned a minimum point value to be considered having met standards for that category. In addition, NYSED's expert reviewers were not instructed to judge a category as having met standard only if all the bulleted items for that category were addressed.

³ ED's interpretation of SBRR is under review in another OIG audit.

ED's expert review panel recommended that NYSED raise the minimum cut-off score from 75 to 80 or include a sentence addressed to the State's reviewers and LEAs that unless all of the bulleted points for each section were addressed, the section could not be judged to have met standard. Otherwise, the scoring rubric implied that an LEA could receive a "Meets Standards" rating for a section of the rubric without meeting all the required Reading First components included under that section.

The Reading First legislation requires LEAs to use Reading First funds to select and implement a learning system or program of reading instruction based on SBRR that includes the essential components of reading instruction (phonemic awareness, phonics, vocabulary development, reading fluency and reading comprehension strategies).

NYSED's expert review teams individually scored the LEA applications, and then, arrived at a consensus overall score, with comments, for each LEA application reviewed. NYSED officials stated it destroyed the individual expert reviewer's scores for each rubric category, including the required activities, upon receiving instructions from a representative from ED's contractor, Learning Point Associates (LPA).⁴ We interviewed the LPA representative regarding this issue. The representative indicated she had given NYSED instructions it did not need to retain the working documents and could shred if NYSED did not have a retention policy. Accordingly, NYSED did not have documentation to support the consensus team score.

Per 34 CFR § 76.731, a State and a subgrantee shall keep records to show its compliance with program requirements.

We could not determine if the LEA applications met all of the seven ESEA-required activities under Reading First. Therefore, we consider NYSED's awarding of funds to the 66 LEAs to be unsupported.

ED funds were put at risk when NYSED awarded \$215,832,254 in Reading First funds to 66 LEAs without maintaining sufficient evidence that the programs met the requirements set forth in the ESEA.

Recommendations

We recommend that the Assistant Secretary of OESE require NYSED to —

- 1.1 Provide support to demonstrate that the reading programs at each of the 66 LEAs awarded Reading First subgrants met the seven ESEA required activities or return the unsupported awards;
- 1.2 Take appropriate action to protect the balance of funds that NYSED awards to the LEAs; and

⁴ The LPA representative provided assistance to eight other approved Reading First states, including the Bureau of Indian Affairs. The representative's instructions for shredding were the same for all nine states unless the state had its own record retention policy.

- 1.3 Maintain supporting documentation for the grant award process in accordance with Federal laws and regulations.

NYSED's Comments

In its response to the draft report, NYSED disagreed with finding 1 and recommendation 1.1, but agreed with recommendations 1.2 and 1.3. NYSED stated that the scoring rubric and the LEA Proposal Review Summary Sheets were sufficient support to demonstrate that all 66 funded LEAs met ESEA requirements. NYSED added that these documents provided evidence of the expert panels consensus scores and that the directions to the reviewers were clearly stated.

According to NYSED, the reviewers were provided explicit instructions on the Reading First Reviewer Notes/Worksheets that proposals that do not address each listed item in the category must be rated "Does Not Meet Standard." The Reviewers Notes/Worksheet directed the reviewers to ensure that each bulleted item was addressed in the LEA application and to give a score of zero to any criterion that did not address each bulleted item. NYSED stated that each funded application received a score of at least one point in the "Meets Standard" column for each criterion as evidence that each bulleted item was addressed. NYSED stated that it retained the key documents (LEA Proposal Review Summary Sheets) that provided evidence of the expert reviewers consensus scores, which were the basis for making determinations about applications. NYSED further stated that reviewers were neither required nor encouraged to prepare an individual score. The Reviewer Notes/Worksheets were used to individually review applications but were not retained. These documents were considered to be temporary drafts, neither distributed nor used to determine an application's final score. Furthermore, NYSED's retention policies considered such documents to be exempt from retention.

NYSED disagreed with the recommendation to provide documentation in support of the seven ESEA required activities at the 66 LEAs awarded Reading First Subgrants or return the unsupported awards plus interest. NYSED contended it had sufficient support for funding all 66 LEAs, and the funding should not be returned. NYSED stated it was prepared to provide alternative documentation.

OIG Response

We considered NYSED's response to Finding 1 and recommendation 1.1, but OIG's position regarding Finding 1 remains unchanged. However, OIG revised recommendation 1.1. NYSED identified 135 LEAs as eligible to apply for Reading First subgrants. In Cohort A, 86 LEAs applied with 48 LEAs being approved and 38 LEAs disapproved. Under Cohort B, 28 of the 38 LEAs were invited to re-apply, of which 18 LEAs were approved. The New York State Comptroller's office directed NYSED to give 50 LEAs, which were not invited to apply in Cohort B, preference in the application process for Cohort C.

OIG maintains that the consensus scoring report does not provide sufficient evidence that each bulleted item within each rubric category was addressed. Instructions for reviewers to rate proposals that did not adequately address each bulleted item as "Does Not Meet Standard" were not included in the scoring rubric or the consensus scoring report. According to NYSED, these instructions were included in Attachment D, Reviewers Notes/Worksheets. The Reviewer

Notes/Worksheets, however, were not retained. In addition, interviews with NYSED's reviewers did not disclose evidence that the reviewers were provided and used the Reviewers Notes/Worksheet. Therefore, there is no support for NYSED's response that instructions were provided to reviewers for proposals that did not address each listed item in the category must be rated "Does Not Meet Standard" and given a score of zero for that category. In fact, there were instances where the rubric scores OIG reviewed were scored very low in some categories. It is not evident on the consensus scoring reports whether such overall low scoring for a category resulted from reviewers determining that each bulleted item within the rubric category was sufficiently addressed. Accordingly, there is no assurance that the seven ESEA requirements contained within the rubric's bulleted categories were properly addressed.

In its response, NYSED stated that the Reviewers Notes/Worksheets were neither used to individually score the LEAs nor were the sheets used to determine the final score. However, an NYSED official, expert reviewers, and the LPA contractor we interviewed, all stated that the reviewers individually scored each LEA application and then, as a group, came to a consensus score based on each reviewer's individual review. In addition, the Reviewers Notes/Worksheet, submitted by NYSED in its response to the draft, has a section for the reviewers to recommend points for each section of the rubric.

Furthermore, NYSED stated that the reviewers' notes were not retained, as this was not required by its record retention policy. The record retention policy, provided by NYSED in Attachment F, excluded temporary drafts and personal notes that were not used to make decisions. However, individual review notes should have been retained under NYSED's record retention policy because reviewers stated that the individual review notes were used to determine a consensus final score. If the reviewers' notes had been maintained by NYSED, along with the consensus scores, NYSED could have had sufficient evidence to support whether the LEAs applications met the requirements of ESEA.

NYSED stated that it could provide OIG alternative documentation to support that the 66 LEAs awarded met the ESEA requirements. NYSED had ample opportunity to provide alternative documentation during the audit, at the formal exit meeting, and in its response to the draft report. It should also be noted that NYSED provided a management representation letter, on June 28, 2006, which indicated that it had complied with our requests for information or disclosed all non-compliance related to the audit. While the management representation letter indicated NYSED complied or disclosed all non-compliance related to the audit, we have modified our recommendation to reflect the NYSED offer of alternative information that should be provided to ED to aid in its determination of whether the new information adequately supports the award of the subgrants. Given the documentation received, OIG could not determine if the LEA applications met all of the seven ESEA-required activities under Reading First. Therefore, we consider NYSED's awarding of funds to the 66 LEAs to be unsupported.

FINDING NO. 2 – NYSED Inappropriately Awarded \$118 Million in Reading First Subgrants to 9 LEAs

Inappropriate Use of Priority Points

NYSED inappropriately used competitive priority points to approve approximately \$118 million in Reading First subgrants for 9 of 66 approved LEA applications. These nine LEAs had a total rubric score of less than 75 by NYSED's expert review teams (see Enclosure 2). NYSED approved for funding all LEA applications that scored 75 or above, including priority points. NYSED staff used priority points to make up the scoring deficit for the nine LEA applications. Priority points may not be used to change the rubric scoring when that scoring shows that the expert panel determined that the application did not meet NYSED's minimum scoring level for funding.

NYSED awarded competitive priority to LEAs that demonstrated specified need indicators and/or indicators of capacity and commitment to increasing reading achievement. According to NYSED's application, up to seven priority points could be awarded by NYSED Reading First staff to eligible LEAs based on need and capacity indicators it identified. ESEA § 1202 (c)(7)(A), states an LEA that receives a Reading First subgrant, shall use the funds to carry out seven required activities. In addition, ESEA § 1202 (c) authorizes an SEA “. . . to make competitive subgrants to eligible LEAs.” When doing so, the SEA “. . . shall give priority to eligible [LEAs] in which at least (i) 15 percent of the children served by the [LEA] are from families with incomes below the poverty line; or (ii) 6,500 children served by the [LEA] are from families with incomes below the poverty line.”

NYSED's use of priority points resulted in the approval of applications that did not meet ESEA requirements. NYSED's expert review teams reported, within the reviewer notes, that the NYCDOE, Ilion Central School District (Ilion), Madison Central School District (Madison), and Fort Edward Union Free School District (Ft. Edward) applications were not in compliance with Federal requirements for Reading First.

In relation to NYCDOE's selected SBRR program the reviewers stated that, "While this program does adequately meet the SBRR requirements in several aspects it is not an adequate total program." The team also stated that, ". . .not all of the gaps falling below the acceptable level for SBRR have been recognized" and recommended that supplemental programs be identified to ensure that all elements of the five reading components are adequately covered. Three of the main components were missing from the alignment of Ilion's selected core program with Reading First. The reviewers stated that Madison's application "does not meet standard." Further, the reviewers stated that several areas "lacked sufficient detail to substantiate the applicant's compliance with the requirements." For Ft. Edward, the review team stated that the instructional materials identified did not cite sufficient research to support that the materials were SBRR.

NYSED's inappropriate use of priority points enabled LEAs whose applications received scores below the minimum cut-off score, to receive Reading First funding. More importantly, as per NYSED's expert review teams, the applications of these LEAs did not meet ESEA requirements.

Incorrect Awarding of Priority Points

We found that NYSED's Reading First personnel incorrectly awarded priority points to LEAs for which they were not eligible to receive. The incorrect application of these points contributed to the awarding of Reading First funds to LEAs whose applications received scores below the minimum cut-off score.

NYSED's expert reviewers scored the application for one of the nine LEAs, NYCDOE, at 68, on the LEA Proposal Review Summary Sheet. NYSED's summary records indicated that NYCDOE received seven priority points. This total scoring resulted in NYCDOE receiving the minimum score required, 75 points, which made it eligible to receive a Reading First subgrant. In response to an OIG request for supporting documentation for the seven priority points awarded, NYSED provided support that showed only four priority points were awarded to NYCDOE's score. NYSED officials had no documentation to support the awarding of the additional three points. As a result, NYSED's scoring for NYCDOE was three points short of the 75 points required, as it really only received 72 points. Therefore, NYCDOE's score was not sufficient to justify receipt of Reading First funding.

We also found two additional LEAs, Ilion and Franklinville Central School District (Franklinville), were awarded priority points they were not eligible to receive. According to our review of NYSED's Reading First Application Screening Checklist (checklist) and the LEA's application, Ilion was eligible to receive only three priority points. NYSED's Reading First personnel inappropriately awarded two additional priority points, for a total of five points, which increased Ilion's total score to 75, resulting in the approval of Reading First for this LEA.

NYSED's checklist for Franklinville disclosed that NYSED Reading First staff initially awarded only one priority point to Franklinville. NYSED's Coordinator of Early Education & Reading Initiatives revised the checklist and awarded all seven priority points before a final revision was made awarding four priority points. The four priority points increased Franklinville's total score to 75 resulting in the approval of Reading First funding for this LEA.

Incorrect Scoring of Reading First Rubric Application

We also found that the expert review team incorrectly scored Elmira's application in two categories. According to NYSED's Reading First Grant Scoring Rubric, for categories "Evaluation Strategies" and "Access to Print Materials," the total score the LEA could receive for "Meets Standards," were eight and four, respectively. The reviewers scored these sections of the application as nine and five. As a result, Elmira's score was inflated by two points. If correctly scored, Elmira's total score should have been 73, including priority points, and therefore, it failed to meet NYSED's minimum cut-off score of 75.

ESEA § 1203 states that an SEA must submit an application to ED to receive funding. One of the items that must be included in the application is a plan containing a description of, among other things, how the SEA will assist LEAs in identifying instructional materials, programs, strategies and approaches, based on scientifically based reading research.

ED's published guide entitled *Guidance for the Reading First Program (April 2002)* notes that the SEA is responsible for ensuring that only programs based on SBRR are funded through

Reading First. In fact, each SEA must demonstrate how it will assist LEAs in identifying instructional materials, programs, strategies and approaches based on SBRR, and how it will ensure that professional development activities related to reading instruction are based on SBRR. The legislation is clear -- in determining which LEAs receive funding, it is the responsibility of the SEA to ensure use of SBRR programs, strategies and activities.

NYSED's approved application states that to be considered eligible for funding, an LEA application must: (1) receive a final score of 75 points or greater; (2) be rated "Meets Standards" or "Exemplary" for all criteria; and (3) demonstrate commitment to implementing the Reading First program in accordance with Federal and State guidelines by providing a Statement of Assurance signed by the Superintendent and principals of each school participating in the program.

NYSED's application further states that, consistent with Federal Reading First criteria, NYSED will give funding priority to LEAs with at least 15 percent of the students from families with incomes below the poverty line, or those LEAs that have at least 6,500 students from families below the poverty line. In addition, applicants will be awarded priority points based on State-identified need and capacity indicators. A district may earn a maximum of seven priority points.

NYSED did not follow Federal requirements when it approved Reading First applications for nine LEAs that the expert review teams scored below NYSED's minimum cut-off score for funding. NYSED did not follow its procedures for awarding priority points as outlined in its approved Reading First application.

NYSED inappropriately awarded approximately \$118 million in Reading First subgrants, of which the nine LEAs had drawn down approximately \$70 million. These subgrants were used to fund Reading First programs that did not meet the requirements set forth in the ESEA. Had NYSED used priority points in accordance with laws and regulations, OIG concluded that the nine LEAs in question would not have been funded and these funds could have been made available to other LEAs.

Recommendations

We recommend that the Assistant Secretary of OESE require NYSED to—

- 2.1 Utilize priority points in accordance with the requirements of the ESEA;
- 2.2 Ensure that all Reading First applications are scored correctly; and
- 2.3 Return the \$118 million of unallowable Reading First funds.

NYSED's Comments

NYSED disagreed with Finding 2 and recommendation 2.3, but agreed with recommendations 2.1 and 2.2. In response to our finding on the inappropriate use of priority points, NYSED responded that its staff awarded priority points only to applications that met standards on all ESEA criteria as determined by the expert review panel. NYSED stated in its response that its submission that was approved by ED, the application and Request for Proposal (RFP) clearly

states that “to be considered for funding a LEA proposal must receive a final score of 75 points or greater, including bonus points.” (priority points) The reviewer’s consensus score, plus the priority points, became the final score. The reviewer’s consensus score is not a deficit score, it is a component of the total score.

NYSED asserted that priority points were not used to determine compliance with ESEA requirements, but rather to determine which applications among those that met all ESEA requirements would receive funding. NYSED also stated that it did not use priority points to “make up for a scoring deficit.” NYSED said that it approved LEA applications in accordance with the methodology submitted in its Reading First application approved by ED.

NYSED also disagreed with our finding that it incorrectly awarded priority points to three LEAs. NYSED stated that the scoring of applications was a multiple stage process and that priority points were designed to meet the needs of high need LEAs. Also, its professional staff reviewed the priority points transcribed by its support staff. As final determinations of scores were made, professional staff, in some cases, modified the awarding of priority points to reflect the number of points for which it had been anticipated the application would be eligible. However, documentation for these changes was not maintained. NYSED acknowledged that in order to meet an extremely compressed timeframe for issuing grants, professional staff in some cases modified the awarding of priority points without documenting these changes.

In response to our finding that NYSED incorrectly scored the Reading First rubric, NYSED stated that LPA submitted the consensus scores to NYSED staff. NYSED further stated that it was not aware of any mathematical scoring mistakes made by the expert panels and that it accepted the reviewer consensus sheets as submitted.

NYSED strongly disagreed with the recommendation to return \$118 million of unallowable Reading First funds. NYSED strongly believes that, based upon ED approval of the LEA application process, advice from LPA, and a rigorous competitive process, each LEA that received funding met ESEA requirements.

OIG Response

We considered NYSED’s response to Finding 2 and recommendation 2.3, but our position remains the same. Because the categories used to award priority points had no relation to the categories in the rubric for scoring whether the application met standards, priority points cannot be used to increase expert reviewers scoring of the applications. Bonus points were not strictly defined in the NYSED application as priority points. NYSED’s application clearly defines exemplary points and priority points and how they were to be evaluated during the scoring process. Page 10 of NYSED’s RFP states that to be considered for funding, an LEA proposal must: receive a final score of 75 points or greater, including bonus points. In its rubric for consensus scoring, NYSED clearly aligns “Meets Standard” scoring of 80, with its “Exemplary Points” of 20, for a total of 100 points for consideration for funding.⁵ Page 39 of NYSED’s RFP, Competitive Priorities, clearly states that priority points can be added to the consensus score to determine need-based priority. Therefore, priority points are not the same as bonus points and

⁵ Exemplary points were awarded, within the NYSED scoring rubric, to LEA applications that provided additional information that strengthened the coherency of the application.

cannot be used to determine the eligibility of an LEA's application for Reading First awards. Priority points can only be used to prioritize funding amongst applications deemed eligible.

Regarding our finding that priority points were incorrectly awarded, NYSED stated that it did not maintain documents that would support its awarding of additional priority points to LEAs. It was NYSED's responsibility to evaluate and determine the number of eligible priority points for each of the LEAs, however NYSED's professional staff was inconsistent in the evaluation and application of priority points. Since supporting documents were not retained, there was no evidence to show that the LEAs were properly awarded priority points. Because NYSED did not provide additional support regarding the awarding of priority points, we find that NYSED inappropriately used priority points to fund \$118 million of Reading First funds.

NYCDOE received substantial technical support prior to NYSED's Reading First application being approved by ED. According to an interview with NYCDOE officials, NYSED provided pre-submission discussions, and had extensive phone conversations with NYCDOE. NYCDOE received a Reading First rubric score of 68. According to one of NYSED's national reviewers there was "anxiety" amongst the team in that NYCDOE's application was close but the reviewers could not score NYCDOE's application any higher. NYCDOE was awarded three priority points in excess of the eligible amount of priority points it should have received. The ineligible priority points were used to boost the score of NYCDOE to 75.

Regarding the finding that NYSED incorrectly scored the Reading First rubric, NYSED stated that LPA provided consensus scores to its staff and that it was unaware of any errors or mistakes. However, in documents that LPA provided NYSED, LPA advised NYSED to review the documents of the reviewers. Had NYSED implemented this suggested review process, it could have found that Elmira received more points than allowed in two areas.

NYSED stated that ED approved its LEA application process, however ED's expert review panel found NYSED's application "Does Not Meet Standard" for three criteria. There was no additional information to show whether these issues were resolved prior to ED's approval of NYSED's application. At the exit conference, NYSED stated it did not receive and was unaware of comments made in regards to their application to ED. In OIG's Final Inspection Report titled *The Reading First Program's Grant Application Process*, I13F0017, dated September 2006, it was noted that ED awarded grants to states without documentation that the subpanels approved all criteria. Specifically, the report questioned whether NYSED should have been awarded Reading First funds without documentation that it met all of the criteria.

FINDING NO. 3 – NYSED Did Not Follow Federal Record Retention Requirements

Missing Conflict of Interest Statements

NYSED could not provide signed Conflict of Interest Statements for two of the three expert reviewers who participated in the evaluation of the Yonkers Cohort B Reading First application. NYSED used four teams of three reading experts to review Cohort B applications. Prospective reviewers with a formal relationship with any eligible Reading First school district or charter school or any commercial vendor of reading instructional programs or materials were not permitted to participate in the review of LEA Reading First applications. All reviewers were required to sign Conflict of Interest Statements to ensure objectivity and fairness in the

competitive review process. However, NYSED was unable to locate Conflict of Interest Statements for two reviewers. Both of these individuals were assigned to the team responsible for the review of the Yonkers Cohort B Reading First application.

Both reviewers also participated in the review of Cohort A Reading First applications. They were assigned to the team responsible for the review of the Yonkers Cohort A Reading First application. Although NYSED provided Conflict of Interest Statements for all 36 Cohort A reviewers, the Statements were signed and dated in January of 2004. Given this, the Conflict of Interest Statements related to the Cohort A review would not be applicable to the review of Cohort B applications conducted in April of 2005. Cohort A Conflict of Interest Statements may not reflect activity that occurred between the review of Cohort A applications and Cohort B applications. NYSED could not provide Conflict of Interest Statements for two of the three expert reviewers assigned to the team responsible for the review of the Yonkers Cohort B Reading First application.

Per 34 CFR § 76.731, a State and a subgrantee shall keep records to show its compliance with program requirements.

According to the "Call for Expert Reviewers - Reading First" issued by NYSED for January 20-24, 2004, "[p]rospective reviewers with a formal relationship with any eligible Reading First school district or charter school or any commercial vendor of reading instructional programs or material may not participate." Individuals selected to participate in the reviews were required to sign Conflict of Interest Statements.

Recommendations

We recommend that the Assistant Secretary of OESE require NYSED to —

- 3.1 Determine whether any conflict of interest existed for the two expert reviewers whose Conflict of Interest Statements were missing and report any necessary corrective actions they plan to take if conflicts existed; and
- 3.2 Ensure that Reading First expert reviewers provide Conflict of Interest Statements for each Cohort prior to reviewing applications.

NYSED's Comments

NYSED generally agreed with the recommendations.

OBJECTIVES, SCOPE, AND METHODOLOGY

The objectives of our audit were to determine whether NYSED (1) developed and used criteria for selecting SBRR programs in accordance with laws, regulations, and guidance; and (2) approved the LEAs applications in accordance with laws, regulations, and guidance.

To achieve our objectives, we reviewed ESEA §§ 1201, 1202, 1203, 1204, and 1208; Education Department General Administrative Regulations (EDGAR) Parts 76, 77, 80, 81, and 85; and *Guidance for the Reading First Program* issued by the U.S. Department of Education.

We examined:

- NYSED's approved Reading First application for its process for approving LEAs,
- NYSED's Reading First applications submitted to ED, NYSED's Reading First request for proposals to its LEAs, and both NYCDOE's and Yonkers' Reading First applications submitted to NYSED,
- ED's contract with LPA to provide Reading First technical assistance to SEAs,
- Reading First technical support materials, and Reading First monthly reports generated by the LPA,
- Emails and other written documentation between ED, NYSED, Yonkers, and NYCDOE,
- Confidentiality Statements and Conflict of Interest Statements for NYSED's expert reviewers,
- NYSED's financial and budgetary documentation for NYCDOE and Yonkers (FS-10s, 10As and 10Fs), and
- *The A Consumer's Guide to Evaluating a Core Reading Program Grades K-3: A Critical Elements Analysis*, by Drs. D. Simmons and E. Kame'enui.

We interviewed:

- Key NYSED Reading First personnel,
- NYCDOE and Yonkers Reading First personnel involved with the application process,
- LPA's director responsible for providing Reading First technical assistance to NYSED and other States, and
- Members of NYSED's expert review team for NYCDOE and Yonkers application evaluation process.

We reviewed funding for NYSED, NYCDOE, and Yonkers. In addition, we reviewed LEA Proposal Review Summary Sheets for eight other LEAs that received subgrants but did not obtain a rubric score of at least 75 points from the expert review team. We reviewed funding and the application scoring for all LEAs approved by NYSED. We reviewed audit reports by ED OIG, New York State Office of the State Comptroller, monitoring reports generated by the ED contractor (American Institutes for Research), and reports by NYSED program personnel.

We conducted our fieldwork in the offices of the New York State Education Department in Albany, New York; the Yonkers Public Schools in Yonkers, New York; and the New York City

Department of Education, in Brooklyn, New York. The audit period was May 1, 2002, through September 30, 2005.

We judgmentally chose NYCDOE and Yonkers as our initial sample of NYSED districts to examine for the Reading First program. We sampled NYCDOE because the amount of Reading First funds that it was approved to receive for each of the first two years of the program, accounted for more than half of the total Reading First funds distributed by NYSED, and Yonkers because it scored 33 on the first round of funding and 83 in the second round of funding. As a result of the improper use of priority points found in the NYCDOE Reading First application, we also judgmentally sampled all NYSED LEAs that scored less than 75 by the expert review teams. There is no assurance that the judgmental sample is representative of the entire universe.

Our work disclosed significant deficiencies in NYSED's internal control for assuring and documenting that LEA applications met the Reading First requirements prior to awarding subgrants. These deficiencies are discussed in the findings.

Our audit was performed in accordance with generally accepted government auditing standards appropriate to the scope of the review described above.

Enclosure 1: NYSED Rubric for Scoring LEA Applications

| Category | Maximum Points for Meets Standards | Maximum Points for Exemplary | Total |
|---|---|-------------------------------------|--------------|
| (i) Schools to be Served | 8 | 2 | 10 |
| (ii) Instructional Assessments | 8 | 2 | 10 |
| (iii) Instructional Strategies and Programs | 12 | 3 | 15 |
| (iv) Instructional Materials | 8 | 2 | 10 |
| (v) Instructional Leadership | 8 | 2 | 10 |
| (vi) District and School-Based Professional Development | 8 | 2 | 10 |
| (vii) District-Based Technical Assistance | 8 | 2 | 10 |
| (viii) Evaluation Strategies | 8 | 2 | 10 |
| (ix) Access to Print Materials | 4 | 1 | 5 |
| (xii) Budget Narrative | 8 | 2 | 10 |
| | | | |
| Total | 80 | 20 | 100 |

Enclosure 2: Inappropriate Use of Priority Points

| LEA | Expert Reviewer Scores | | | Priority Points | Total Score | Funds Awarded (FY 2004-2006) |
|--|------------------------|-----------|-------|-----------------|-------------|---------------------------------|
| | Meets Standard | Exemplary | Total | | | |
| NYCDOE ⁶ | 58 | 10 | 68 | 7 | 75 | \$107,018,028 |
| Franklinville | 63 | 8 | 71 | 4 | 75 | 1,237,586 |
| Mount Morris Central School District | 63 | 11 | 74 | 3 | 77 | 1,053,375 |
| Ilion | 63 | 7 | 70 | 5 | 75 | 2,423,374 |
| North Rose-Wolcott Central School District | 69 | 4 | 73 | 3 | 76 | 1,250,000 |
| Stepping Stone Academy Charter School | 65 | 7 | 72 | 3 | 75 | 1,250,002 |
| Elmira | 68 | 4 | 72 | 3 | 75 | 3,258,663 |
| Madison | 62 | 10 | 72 | 6 | 78 | 424,938* |
| Ft. Edward | 66 | 7 | 73 | 6 | 79 | 424,616* |
| Total Funds Awarded | | | | | | \$118,340,582 |

* FY 2006 was the LEA's first year of funding.

⁶ We reported to you in IAM State and Local No. 06-01, dated December 16, 2005, that NYSED granted NYCDOE priority points it was ineligible to receive.

Enclosure 3: NYSED Comments



THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY
12234

PRESIDENT OF THE UNIVERSITY
AND COMMISSIONER OF EDUCATION

September 21, 2006

Mr. Daniel P. Schultz
U.S. Department of Education
Office of Inspector General
32 Old Slip, 26th Floor
Financial Square
New York, NY 10005

Dear Mr. Schultz:

I am responding to your letter of August 22, 2006 regarding the draft Audit Report of the New York State Education Department's Reading First Program, Control Number ED-OIG/A02G002. A copy of our detailed response is attached. The response addresses specific comments and observations in the text of the report as well as the audit recommendations.

The New York State Education Department (NYSED) takes seriously its obligation to administer Federal programs in accordance with applicable laws, regulations, and guidance. We are pleased that the Office of Inspector General (OIG) has found that the NYSED developed and used criteria for selecting scientifically based reading research (SBRR) programs in accordance with the law as interpreted by the United States Department of Education (USDE). However, in general, we disagree with the findings of the audit that NYSED failed to approve LEA applications in accordance with applicable laws, regulations and guidance. As detailed in our response, many of the actions taken by the NYSED were either explicitly delineated in the application that was approved by the USDE or recommended to NYSED by USDE's contracted technical assistance provider, Learning Point Associates. In other cases, the auditors have made inferences based on isolated statements in documents that are not supported by a more complete review of the entire process by which NYSED approved Reading First grants.

Throughout the audit process, NYSED staff have cooperated with the audit team and been responsive to its requests. To the extent to which the audit has identified improvement opportunities, we are committed to taking appropriate actions, many of which have already been implemented, as detailed in our response.

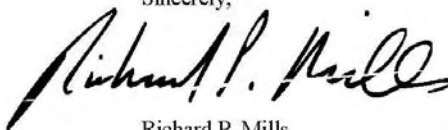
The demands and requirements of the Reading First are very rigorous. The NYSED and local educational agencies have been diligent in adhering to these requirements. The funding awarded to districts in New York was made to very high need districts. Over 90% of the public schools participating in New York's Reading First program were Title I schools. All LEAs that received funding were among those that reported the lowest percentages of students achieving proficiency on the 2002-2003 school year administration of the State Grade Four English Language Arts assessment. The implementation of Reading First in schools that have received funding has been carried out with fidelity.

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Initial student data shows that participating students throughout the New York State are making progress in developing reading skills. With the technical assistance and support of USDE, we will work to further improve our process and ensure that the program meets our mutual goal of creating exemplary reading programs in participating schools.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard P. Mills". The signature is written in a cursive style with a large, prominent initial "R".

Richard P. Mills

c: Christopher Doherty
Charles Foster
Jean C. Stevens
Theresa E. Savo
Shelia Evans-Tranum
Kathy Ahearn
Alan Ray
Diana Hinchcliff

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Response to Finding No. 1 - NYSED Could Not Provide Support for \$216 Million in Reading First Subgrants

Overall the New York State Education Department Does Not Agree with Findings in No. 1

| Issue in Finding #1 | NYSED Response | Documentation |
|--|---|---|
| <p>¶ 1 p. 4</p> <p>NYSED awarded \$215,832,254 to 66 LEAs, but it did not provide sufficient support that NYSED or its expert review teams determined that the Reading First requirements of ESEA were met.</p> | <ul style="list-style-type: none"> ▪ NYSED has sufficient support to demonstrate that each funded LEA application met the requirements of ESEA: <ul style="list-style-type: none"> - The rubric used to guide the development of applications by LEAs and by the expert panel to score the applications was approved by USDE and contained each of the seven ESEA requirements. - SED maintained copies of the consensus scoring sheets (LEA Proposal Review Summary Sheet) used by the expert panels. These summary sheets demonstrate that each approved application met the Reading First requirements because each such approved application was rated as "Meets Standard" for each bullet in each criterion. | <p>Attachment A</p> <p>Attachment B</p> |
| <p>¶ 1 p. 4</p> <p>Based on the methodology used to score the applications and NYSED's destruction of key documents, we could not determine that approved LEAs met all activities required for a Reading First subgrant.</p> | <ul style="list-style-type: none"> ▪ The methodology used to score applications was submitted by SED as part of NY's Reading First application and approved by USDE. ▪ New York's review process adhered to the directions provided by Learning Points Associates, which was contracted by USDE to assist states to establish their peer review processes. ▪ The key documents (LEA Proposal Review Summary Sheet) that provide evidence of the expert panels' consensus scores were retained. Upon the advice of Learning Points Associates, SED did not retain the personal notes of review panel members. The fact that Learning Points Associates provided this direction to SED was confirmed by the OIG. | <p>Attachment B</p> |

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| Issue in Finding #1 | NYSED Response | Documentation |
|--|--|----------------------------------|
| | <ul style="list-style-type: none"> ▪ Instructions provided to review panel members on the Reading First Reviewer Notes/Worksheets explicitly state that "Proposals that do not address each listed item in the category <u>must</u> be rated 'Does Not Meet Standard.'" The determination that LEAs met all the required activities under ESEA is documented on the review panel's consensus scoring sheet. The scoring sheet matches each criteria in the rubric and the rubric aligns with each of the seven requirements under ESEA § 1202(c)(7)(A)i-vii. ▪ Any criterion for which a bulleted item was not satisfactorily addressed received a score of zero for that criterion and was judged to have "not met standards." Any application in which any criterion was determined to "not meet standards" was ineligible for funding. ▪ Each funded application received a score of at least one point in the "Meets Standard" column for each criterion – evidence that each bulleted item was addressed. A score of zero meant that an ESEA criterion had not been met. | Attachment D |
| <p>¶ 2 p. 4</p> <p>According to ESEA § 1202 (c)(7)(A), an LEA that receives a Reading First subgrant, shall use the funds to carry out seven required activities. In addition, ESEA § 1202(c)(4) states that to be eligible to receive a subgrant, an eligible LEA shall submit an application to the SEA at such time, in such manner, and containing such information as the SEA may reasonably require.</p> | <ul style="list-style-type: none"> ▪ The Reading First rubric that was included in New York's application was approved by USDE and deemed a complete and allowable tool to use to score applications. ▪ The auditors from the OIG acknowledge that "NYSED incorporated the seven ESEA required activities, along with additional requirements within its Reading First rubric." ▪ The Reading First rubric used by LEAs in the development of their applications contained all of the seven components required under ESEA § 1202 (c)(7)(A)i-vii. A chart developed by NYSED demonstrates the completeness of the rubric. | Attachment A Attachment C |

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| Issue in Finding #1 | NYSED Response | Documentation |
|--|---|--|
| | <ul style="list-style-type: none"> ▪ New York's Reading First Reviewer Notes/Worksheets state that "Proposals that do not address each listed item in the category <u>must</u> be rated "Does Not Meet Standard." Determinations that LEAs met all the required activities under ESEA are documented on the review panels' consensus scoring sheets. The scoring sheets match each criteria in the rubric, and the rubric aligns with each of the seven requirements under ESEA § 1202(c)(7)(A)i-vii. ▪ Each funded application received a score of at least one point in the "Meets Standard" column for each criterion – evidence that each bulleted item was addressed. A score of zero meant that an ESEA criterion had not been met. | Attachment D |
| <p>¶ 3 p. 4</p> <p>NYSED incorporated the seven ESEA-required activities, along with its additional requirements, within its Reading First rubric. This included the requirement that an LEA application be scored at a minimum of 75 points and be rated "Meets Standards" or "Exemplary" for each section of the rubric by NYSED's expert review team in order to be approved. Under NYSED's scoring, an LEA could receive a maximum of 80 points for addressing components listed under "Meets Standards" and 20 points for addressing components listed under "Exemplary." (See Enclosure 1) However, the rubric was insufficient to support the LEA applications met all the ESEA requirements.</p> | <ul style="list-style-type: none"> ▪ Directions to the reviewers clearly stated as documented on the Reviewer Notes/Worksheet that every component contained in the rubric must be addressed in the LEA application or a score of 0 must be assigned to the criterion. Reading First Reviewer Notes/Worksheets state that "Proposals that do not address each listed item in the category <u>must</u> be rated "Does Not Meet Standards." ▪ The approved RFP used by LEAs to develop their applications stated the same. The expert panels were provided the RFP during their orientation. The expectation was evident in the RFP and stated directly on the Reviewers Worksheets. ▪ The USDE approved NYSED application stated that every application must be rated as "Meets Standard" for all criteria. | Attachment D Attachment E Attachment I |
| <p>¶ 4 p. 4</p> <p>NYSED's Reading First rubric did not adequately document that requirements were</p> | <ul style="list-style-type: none"> ▪ New York's Reading First rubric was submitted in its application and approved by USDE as a complete and allowable tool to use for scoring applications. The rubric included each of the seven ESEA criteria in § | Attachment A |

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| Issue in Finding #1 | NYSED Response | Documentation |
|--|---|---------------------|
| <p>met because each individual bulleted item in a category was not assigned a minimum point value to be considered having met standards for that category. In addition, NYSED's expert reviewers were not instructed to judge a category as having met standard only if all the bulleted items for that category were addressed.</p> | <p>1202(c)(7)(A).</p> <ul style="list-style-type: none"> ▪ In order to provide the expert review panels with flexibility in determining a consensus score, the reviewers were permitted to assign an appropriate score of from one to the maximum number of points in the "meets standard" category so long as each bullet item was adequately addressed. Requiring the panel to assign a point value to each bulleted item would have significantly narrowed the range of permissible scores. ▪ The NYSED has used similar rubrics in other competitive grant processes that have been approved by the NYS Office of the State Comptroller and the NYSED Contract Administrative Unit. NY standard operating procedures do not require each bullet to be assigned a discrete score so long as reviewers make a determination that each bulleted item is addressed adequately. | |
| <p>¶ 1 p. 5</p> <p>ED's expert review panel recommended that NYSED raise the minimum cut-off score from 75 to 80 or include a sentence addressed to the State's reviewers and LEAs that unless all of the bulleted points for each section were addressed, the section could not be judged to have met standard. Otherwise, the scoring rubric implied that an LEA could receive a "Meets Standards" rating for a section of the rubric without meeting all the required Reading First components included under that section.</p> | <ul style="list-style-type: none"> ▪ The Reviewers Notes/Worksheet contained a sentence that directed the reviewers to ensure that each bulleted item was addressed in the LEA application and to give a score of 0 to any criterion that did not address each bulleted item, thereby making the application non-fundable. These directions are documented on the Reviewers Notes/Worksheets. ▪ Every funded application was rated as "Meets Standards" for each criterion. These criteria were aligned to each of the seven required criteria of the ESEA. ▪ At a meeting on June 14, 2006, the OIG auditors met with SED staff in Albany, New York. At that meeting it was clearly stated that, in fact, the NYSED did not receive these comments and therefore was unaware of this recommendation. At this closing conference the auditors | <p>Attachment D</p> |

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| Issue in Finding #1 | NYSED Response | Documentation |
|---|---|---------------------|
| <p>¶ 3 p. 5</p> <p>NYSED's expert review teams individually scored the LEA applications, and then, arrived at a consensus overall score, with comments, for each LEA application reviewed.</p> | <p>from OIG acknowledged that the USDE did not advise NYSED of the expert panel's recommendation.</p> <ul style="list-style-type: none"> ▪ The review panel's consensus score and not the individual judgments of reviewers was the basis for making determinations about applications. The score of the review panel was determined by consensus and was not derived by adding or averaging an individual reviewer's score. In fact, individual reviewers were neither required nor encouraged to prepare an individual score. | <p>Attachment D</p> |
| <p>¶ 3 p. 5</p> <p>NYSED officials stated it destroyed the individual expert reviewer's scores for each rubric category, including the required activities, upon receiving instructions from a representative from ED's contractor, Learning Point Associates (LPA). We interviewed the LPA representative regarding this issue. The representative indicated she had given NYSED instructions it did not need to retain the working documents and could shred if NYSED did not have a retention policy. Accordingly, NYSED did not have documentation to support the consensus team score.</p> | <ul style="list-style-type: none"> ▪ The reviewers did not individually score applications. The reviewer's were provided worksheets so that reviewers could write notes to help them to organize for participation in the consensus discussion and consensus scoring process. ▪ The documents not retained were the reviewers Notes/Worksheet. The documents were temporary drafts, neither distributed nor used to determine an application's final score. NYSED's retention policies consider such documents as exempt from retention. ▪ Learning Points Associates, working under contract for USDE, provided advice that such documents did not need to be retained. ▪ NYSED contends that records were kept that document the consensus score provided. Disposal of the individual reviewer's notes, which were not the basis of the consensus score, was done to protect the confidentiality of the individual reviewers. | <p>Attachment D</p> |
| <p>¶ 4 p. 5</p> <p>Per 34 CFR § 76.731, a State and a subgrantee shall keep records to show its compliance with program requirements.</p> | <ul style="list-style-type: none"> ▪ The NYSED kept documents that pertained to final transactions that ensured that ESEA requirements were met. The documents are: <ul style="list-style-type: none"> - the expert panel consensus score sheet | <p>Attachment B</p> |

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| Issue in Finding #1 | NYSED Response | Documentation |
|---|--|---|
| <p>¶ 5 p. 5</p> <p>We could not determine if the LEA applications met all of the seven ESEA-required activities under Reading First. Therefore, we consider NYSED's awarding of funds to the 66 LEAs to be unsupported.</p> | <p>- the funded LEA applications</p> <ul style="list-style-type: none"> ▪ The consensus process was defined in the NYS Reading First Proposal and endorsed by the USDE's approved contractor, Learning Points Associates (LPA). ▪ The NYSED application approved by USDE states that a proposal must be rated as "Meets Standard" for all criteria. ▪ The RFP used by LEAs to develop proposals states that an application must be rated as "Meets Standard" for all criteria. ▪ The Reading First Reviewer Notes/Worksheet states that "Proposals that do not address each listed item in the category <u>must</u> be rated "Does Not Meet Standard." The determination that LEAs met all the required activities under ESEA is documented on the review panels' consensus scoring sheet. The scoring sheet matches each criteria in the rubric and the rubric aligns with each of the seven requirements under ESEA § 1202(c)(7)(A)i-vii. <p>Any criterion for which a bulleted item was not satisfactorily addressed received a score of zero for that criterion and was judged to have "not met standards." Any application in which any criterion was determined to "not meet standards" was ineligible for funding.</p> <ul style="list-style-type: none"> ▪ According to 34 CFR § 76.731 "A state and a subgrantee shall keep records to show its compliance with program requirements." The following records were kept that support that funded LEAs met each of the seven required components under ESEA. | <p>On file at NYSED</p> <p>Attachment I</p> <p>Attachment E</p> <p>Attachment D</p> |

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| Issue in Finding #2 | NYSED Response | Documentation |
|--|--|---|
| | <p>75, including priority points.</p> <ul style="list-style-type: none"> ▪ The expert panel did not determine what was the minimum scoring level for funding. The expert panels did not have access to NYSED funding amounts or balances available to LEAs. ▪ The review panel's sole purpose was to assign a consensus score based on the rubric, thereby ensuring the application met requirements under ESEA § 1202(c)(7)(A)-vii. If any bullet item on the rubric was classified as "Does Not Meet Standard," the LEA application could not be funded. ▪ Priority points were never used to change the "rubric scoring," which was the reviewers' consensus score. Priority points were added to the consensus score provided by the expert panel. | |
| <p>¶ 3 p. 6</p> <p>NYSED's use of priority points resulted in the approval of applications that did not meet ESEA requirements. NYSED's expert review teams reported, within the reviewer notes that the NYC DOE, Ilion Central School District (Ilion), Madison Central School District (Madison), and Fort Edward Union Free School District (Ft. Edward) applications were not in compliance with Federal requirements for Reading First.</p> | <ul style="list-style-type: none"> ▪ NYC DOE's application was reviewed by the expert panel and received a consensus score of 68. Every category of the seven ESEA requirements was rated as "Meets Standard" as the panel did not award a score of zero in any of the ESEA seven required components. ▪ Ilion Central School District's (Ilion) application was reviewed by the expert panel and received a consensus score of 70 and every component of ESEA was rated as "Meets Standard." ▪ The Madison Central School District (Madison) received a consensus score of 72 and every component of ESEA was rated as "Meets Standard." ▪ Fort Edward Union Free School District (Fort Edward) received a consensus score of 73 and every ESEA | <p>Attachment J</p> <p>Attachment K</p> <p>Attachment L</p> |

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| Issue in Finding #2 | NYSED Response | Documentation |
|--|---|---------------|
| <p>¶ 4 p. 6</p> <p>In relation to NYC DOE's selected SBRR program the reviewers stated that, "While this program does adequately meet the SBRR requirements in several aspects it is not an adequate total program." The team also stated that, "... not all of the gaps falling below the acceptable level for SBRR have been recognized" and recommended that supplemental programs be identified to ensure that all elements of the five reading components are adequately covered.</p> | <p>requirements was rated as "Meets Standard."</p> <ul style="list-style-type: none"> ▪ It is not unexpected that a group of experts who were charged with the review of applications for Reading First would comment upon the application. ▪ The reviewers' statements that the NYC DOE program is not an "adequate total program" should not be interpreted to mean that the application did not meet the criteria of ESEA. ▪ At this point in time, no core reading program has depth in every aspect of scientific research. The statements by the reviewers acknowledge this condition. All core programs need additional supplemental programs to ensure that the five major components are comprehensively addressed. | |
| <p>¶ 4 p. 6</p> <p>"Three of the main components were missing from the alignment of Ilion's selected core program with Reading First."</p> | <ul style="list-style-type: none"> ▪ Ilion's consensus score was 70 and rated as "Meets Standard" in each of the ESEA Categories. ▪ The reviewer comments are not specific and stated that three of "the main components was missing." It is unclear from these comments what "missing" means. The statement does not stipulate what SBRR components are missing. No assumptions should be made from this statement. The core reading program selected was rated as having the five components of SBRR on the Consumers' Guide. ▪ The evidence that Ilion's application met each ESEA is clear in that there is not a score of 0 on any criteria. | |
| <p>¶ 4 p. 6</p> <p>The reviewers stated that Madison's application "does not meet standard." Further, the reviewers stated that several areas "lacked sufficient detail to substantiate the applicant's compliance with the requirements.</p> | <ul style="list-style-type: none"> ▪ The reviewers rated this proposal as "Meets Standards" in every area. ▪ The comment "does not meet standards" does not pertain to the ESEA components but rather to details like "school demographics," use of dated statistics and lack of detail. Although the expert panel may have desired further | |

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| <p>¶ 4 p. 6</p> <p>For Fort Edward, the review team stated that the instructional materials identified did not cite sufficient research to support that the materials were SBRR.</p> | <p>explanations and detail, every ESEA category was scored as "Meets Standard."</p> <ul style="list-style-type: none"> ▪ The Fort Edward's proposal was scored as "Meets Standard" in every ESEA required component. ▪ The reviewer comments regarding lack of depth in citing research indicates areas where the application could be improved, not that it was a proposal that could not be approved. ▪ Each expert panel's style of comments vary. When the consensus score demonstrates that the application met standards on all criteria, the comments should be viewed as suggestions for improvement, not as reasons why the application should not be approved. | |
| <p>¶ 1 p. 7</p> <p>NYSED's inappropriate use of priority points enabled LEAs whose applications received scores below the minimum cut-off score, to receive Reading First funding. More importantly, as per NYSED's expert review teams, the applications of these LEAs did not meet ESEA requirements.</p> | <ul style="list-style-type: none"> ▪ This statement is not accurate. Every funded application was scored as "Meets Standard" on ESEA requirements. This is evident in the reviewers consensus score. No criteria in an approved application received a zero. ▪ Expert panel members received clear directions that if any of the bulleted items in any of the seven ESEA requirements was not addressed, a score of zero should be assigned, thereby making the application non-fundable. | Attachment D |
| <p>¶ 2 p. 7</p> <p><u>Incorrect Awarding of Priority Points</u></p> <p>We found that NYSED's Reading First personnel incorrectly awarded priority points to LEAs for which they were not eligible to receive. The incorrect application of these points contributed to the awarding of Reading First funds to LEAs whose applications received scores below the minimum cut-off</p> | <ul style="list-style-type: none"> ▪ The scoring of applications was a multiple stage process. ▪ Priority points were designed to meet the needs of high need LEAs. The point categories used were approved by USDE. ▪ Support staff, during the preliminary review of the application, transcribed the priority points requested by LEA's in their applications. ▪ Upon completion of the expert panel's determination of | Attachment M |

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| score. | <p>the consensus score, final scores were then compiled.</p> <ul style="list-style-type: none"> ▪ SED professional staff reviewed the priority points transcribed by support staff. As New York was in the last group of states awarded funding, timelines were extremely tight for meeting the deadline to award first year funding. As final determinations of scores were made, professional staff in some cases modified the awarding of priority points to reflect the number of points for which it had been anticipated the application would be eligible. Documentation for these changes was not maintained. | |
| <p>¶ 3 p. 7</p> <p>NYSED's expert reviewers scored the application for one of the nine LEAs, NYC DOE, at 68 on the LEA Proposal Review Summary Sheet. NYSED's summary records indicated that NYC DOE received seven priority points. This total scoring resulted in NYC DOE receiving the minimum score required, 75 points, which made it eligible to receive a Reading First subgrant. In response to an OIG request for supporting documentation for the seven priority points awarded, NYSED provided support that showed only four priority points were awarded to NYC DOE's score. NYSED officials had no documentation to support the awarding of the additional three points. As a result, NYSED's scoring for NYC DOE was three points short of the 75 points required, as it really only received 72 points. Therefore, NYC DOE's score was not sufficient to justify receipt of Reading First funding.</p> | <ul style="list-style-type: none"> ▪ The design of the USDE approved priority points was focused on high need LEAs. ▪ The intent of the Reading First statute is to provide funding to improve the reading skills for students in grades k-3 in high need districts. Funding was intended to target schools with the highest percentage of students reading below grade level and districts with high numbers of poor students. The Big 5 Cities and all LEAs eligible to apply for Reading First funding in NYS are very high need and priority points were designed to be awarded to such LEAs. Over 90% of NY's Reading First schools are in Title I status. Further, all of our schools were at the lowest levels (Level 1 and 2), on the 02-03 Report Card. ▪ In New York City, 83% of students are at poverty level and 56% of students performed below proficiency on the 2001 grade four ELA state assessment. ▪ Priority points were first transcribed from the applications by support staff during a preliminary review. ▪ In order to meet an extremely compressed timeframe for | <p>Attachment O</p> |

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| | issuing grants, professional staff in some cases modified the awarding of priority points without documenting these changes. | |
| <p>¶ 4 p. 7</p> <p>We also found two additional LEAs, Ilion and Franklinville Central School District (Franklinville), were awarded priority points they were not eligible to receive. According to our review of NYSED's Reading First Application Screening Checklist (checklist) and the LEA's application, Ilion was eligible to receive only three priority points. NYSED's Reading First personnel inappropriately awarded two additional priority points, for a total of five points, which increased Ilion's total score to 75, resulting in the approval of Reading First for this LEA.</p> | <ul style="list-style-type: none"> ▪ The design of the USDE approved priority points was focused on high need LEAs. ▪ The Big 5 Cities and all LEAs eligible to apply for Reading First funding in NYS are very high need and priority points were designed to be awarded to such LEAs. ▪ Priority points were first transcribed from the applications by support staff during a preliminary review. ▪ In order to meet an extremely compressed timeframe for issuing grants, professional staff in some cases modified the awarding of priority points without documenting these changes. | |
| <p>¶ 5 p. 7</p> <p>NYSED's checklist for Franklinville disclosed that NYSED Reading First staff initially awarded only one priority point to Franklinville. NYSED's Coordinator of Early Education & Reading Initiatives revised the checklist and awarded all seven priority points before a final revision was made awarding four priority points. The four priority points increased Franklinville's total score to 75 resulting in the approval of Reading First funding for this LEA.</p> | <ul style="list-style-type: none"> ▪ The design of the USDE approved priority points was focused on high need LEAs. ▪ The Big 5 Cities and all LEAs eligible to apply for Reading First funding in NYS are very high need and priority points were designed to be awarded to such LEAs. ▪ Priority points were first transcribed from the applications by support staff during a preliminary review. ▪ In order to meet an extremely compressed timeframe for issuing grants, professional staff in some cases modified the awarding of priority points without documenting these changes. | |
| <p>¶ 6 p. 7</p> | <ul style="list-style-type: none"> ▪ The consultant from Learning Points Associates, who was contracted by USDE to assist states, coordinated the | |

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| <p><u>Incorrect Scoring of Reading First Rubric Application</u></p> <p>We also found that the expert review team incorrectly scored Elmira's application in two categories. According to NYSED's Reading First Grant Scoring Rubric, for categories "Evaluation Strategies" and "Access to Print Materials," the total score the LEA could receive for "Meets Standards," were eight and four, respectively. The reviewers scored these sections of the application as nine and five. As a result, Elmira's score was inflated by two points. If correctly scored, Elmira's total score should have been 73, including priority points, and therefore, if failed to meet NYSED's minimum cut-off score of 75.</p> | <p>collection of the consensus scores from the review panel and their submission to SED staff.</p> <ul style="list-style-type: none"> ▪ Every effort was made to maintain the independence and confidentiality of the review panel. The LPA consultant provided oversight and coordination to ensure that SED staff did not infringe on the independence of the review panel. ▪ The consensus scores were submitted to staff at SED by the Learning Point consultant. Staff accepted the reviewer consensus sheets as submitted. SED was not aware of any mathematical scoring mistakes made by the expert panels until the release of the audit findings. | |
| <p>¶ 2 p. 8</p> <p>NYSED's approved application states that to be considered eligible for funding, an LEA application must: (1) receive a final score of 75 points or greater; (2) be rated "Meets Standards" or "Exemplary" for all criteria.</p> | <ul style="list-style-type: none"> ▪ Each funded LEA received a final score of 75 points or higher. ▪ Each funded LEA application was reviewed by an expert panel that was guided by a rubric approved by USDE that included all of the seven required ESEA components | |
| <p>¶ 4 p. 8</p> <p>NYSED did not follow Federal requirements when it approved Reading First applications for nine LEAs that the expert review teams scored below NYSED's minimum cut-off score for funding. NYSED did not follow its procedures for awarding priority points as outlined in its approved Reading First application.</p> | <ul style="list-style-type: none"> ▪ The USDE approved NYSED application clearly states that "to be considered for funding a LEA proposal must receive a final score of 75 points or greater, including bonus points." (priority points) The reviewers' consensus score, plus the priority points when added together became the final score. ▪ Expert review teams did not determine the minimum cut-off score for funding. Their facet of the scoring process ensured that all applications met the ESEA requirements. The minimum cut-off score for funding was determined | Attachment E |

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| ¶ 5 p. 8 NYSED inappropriately awarded approximately \$118 million in Reading First subgrants, of which the nine LEAs had drawn down approximately \$70 million. These subgrants were used to fund Reading First programs that did not meet the requirements set forth in the ESEA. | <p>by the amount of funds available to provide grants to LEAs whose applications, including priority points, achieved a score of at least 75 points.</p> <ul style="list-style-type: none"> ▪ Each funded LEA met the requirements of ESEA because the consensus score was evidence that each of the seven criteria was awarded a score other than zero. If a score of zero had been given, the application would have been excluded as approvable for funding. ▪ The rubric used by LEA to develop proposal addressed each of the ESEA requirement and each funded LEA's application was reviewed by an independent review panel that rated each criteria as "Meets Standard." | |

Finding No. 3 - NYSED did not follow Federal Retention Requirements

Overall the New York State Education Department Does Not Agree with the Finding in No. 3

| Issue in Finding #3 | NYSED Response | Documentation |
|---|---|-----------------------|
| NYSED could not support that it ensured objectivity and fairness in competitive review process of LEA applicants. | <ul style="list-style-type: none"> ▪ The NYSED applied a very rigorous and fair competitive process. The NYSED used and applied the advice of LPA. Only national, expert reviewers recommended by LPA, were brought in to review LEA applications. We utilized a consensus score to ensure fairness and comprehensiveness of review. | |
| NYSED could not present Conflict of Interest Statements for two of the 12 expert reviewers. | <ul style="list-style-type: none"> ▪ It is accurate that 2 of 12 Conflict of Interest Statements cannot be found. Conflict of Interest forms for these two reviewers for Cohort B were available. | 10 statements on file |

Response to Recommendations from OIG Draft Audit Report ED-OIG/A02G0002

| Recommendations from Findings | NYSED Response | Time Frame |
|--|--|--------------------------------------|
| 1.1 Provide documentation in support of the seven ESEA required activities at 66 | 1.1 <u>We disagree with the recommendation.</u> NYSED contends that sufficient support for funding 66 LEAs was evident | - If the additional documentation is |

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| | | |
|---|---|--|
| <p>LEAs awarded Reading First Subgrants or return the unsupported awards of \$215,832,254 plus applicable interest.</p> | <p>and funding should not be returned. Should the USDE request alternative documentation, NYSED is prepared to provide:</p> <ul style="list-style-type: none"> - Copies of the 66 LEA applications that used the USDE approved rubric in the proposed development of their proposals. Rubric was complete and addressed each ESEA requirement under Section 1202 - Implementation progress reports; - Interviews with Regional School Support Centers (RSSCs); - Records of teacher participation in on-line Reading Academy; - Student performance data; and - Affidavits from panel members attesting to their understanding that their individual notes were not used to derive the consensus score. | <p>requested it could be provided within an appropriate timeframe.</p> |
| <p>1.2 Take appropriate action to protect the balance of funds that NYSED awards to the LEAs.</p> | <p>1.2 <u>We agree with the recommendation.</u> NYSED has taken the following steps to meet concerns raised by the OIG auditors brought to our attention in meetings prior to receipt of the written audit report:</p> <ul style="list-style-type: none"> - provided written and explicit directions to review panels regarding the requirements for the awarding of a "meets standards" designation for a particular criterion. - retained individual Reviewer's Notes/Worksheet from subsequent application cycles; - worked with the Office of State Archives and Record Administration to develop protocols for the retention of records for the Reading First grant process; - developed written description of roles and responsibilities of the review team members; and - required that all review members initial the summary document. | <ul style="list-style-type: none"> - Completed – Attachment N - Completed - Completion by 1/07 - Completed – Attachment G - Completed – |

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| Recommendations from Findings | NYSED Response | Time Frame |
|--|--|---|
| 1.3 Maintain supporting documentation for the grant award process in accordance with Federal laws and regulations. | <p>1.3 <u>We agree with the recommendation.</u> The NYSED has worked with staff at the Office of State Archives and Record Administration to develop retention schedules for Reading First.</p> <ul style="list-style-type: none"> - NYSED has since maintained all applications from LEAs, both for those awarded and those not awarded grants - NYSED has maintained individual reviewer worksheets. | <p>Attachment N</p> <ul style="list-style-type: none"> - Completed and on file - Completed and on file |
| 2.1 Utilize priority points in accordance with the requirements of the ESEA. | <p>2.1 <u>We agree with the recommendation.</u> NYSED contends that categories of priority points that were submitted with New York's final application and approved by the USDE meet ESEA requirements. However, based upon informal recommendations provided during the conduct of the audit process, SED submitted and received permission from USDE to amend the categories used for priority points. We used the revised priority point rubric for the March 2006 funding round. We have also revised the recording form for the consensus score.</p> | <p>Completed – Attachment H</p> |
| 2.2 Ensure that all Reading First applications are scored correctly. | <p>2.2 <u>We agree with the recommendation.</u> The NYSED will develop procedures to check the accuracy of the computation of consensus scores made by the expert panels. We will ensure that the process maintains the independence of the expert review panel.</p> | <ul style="list-style-type: none"> - If future funding cycle are available, this process will be utilized |
| 2.3 Return the \$118 million of unallowable Reading First funds. | <p>2.3 <u>We strongly disagree.</u> The NYSED strongly believes that, based upon USDE approval of the LEA application process, advice from Learning Points Associates and a rigorous competitive process, that each LEA that received funding met the requirements of ESEA.</p> <p>To substantiate this further, SED is prepared to submit documentation for each LEA that received funding to</p> | <ul style="list-style-type: none"> - If further documentation is required it can be submitted within a reasonable timeframe. |

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| | <p>demonstrate implementation of its application. Documentation could include:</p> <ul style="list-style-type: none"> - the LEA application - progress reports - student data - interviews with RSSCs that conduct site visits - monitoring reports, where conducted - final reports | |
|--|--|---------------------------------|
| Recommendations from Findings | NYSED Response | Time Frame |
| 3.1 Determine whether any conflict of interest existed for the two expert reviewers whose Conflict of Interest Statements were missing and report any necessary corrective actions they plan to take if conflicts existed. | 3.1 <u>We agree with this recommendation.</u> The NYSED can ask the two expert reviewers to sign an affidavit attesting that they had previously signed such Conflict of Interest Statements. | - Within a reasonable timeframe |
| 3.2 Ensure that Reading First expert reviewers provide Conflict of Interest Statements for each Cohort prior to reviewing applications. | 3.2 <u>We agree with this recommendation.</u> NYSED has Conflict of Interest Statements for all Cohorts that have occurred since the time period covered by the audit. | - Completed and on file |

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Appendix E: Reading First Grant Scoring Rubric

| | | |
|-------------------------------|---------------------------|----|
| District/Charter School Name: | | |
| Reviewer's Name: | | |
| Date Reviewed: | | |
| Number of schools applied for | Application amount Year 1 | \$ |

| Completeness of Application – no points |
|--|
| Check all items that are included in the application. If any item is missing, STOP and return proposal to review coordinator. |
| () Completed cover page |
| () Statement of Assurances (original signature) |
| () Statement of Commitment (original signatures) |
| () Certifications (original signatures) |
| () Documentation of Teachers' Union Participation |
| () Documentation of Private School Consultation |
| () Project Abstract |
| () Project Description |
| () FS-10 and Three Year Budget Narrative |

| (i) Schools to be Served - 10 Points | | |
|--|---|--|
| Does Not Meet Standards 0 points | Meets Standards 1-8points | Exemplary 9-10 points |
| <p>The proposal:</p> <ul style="list-style-type: none"> Does not adequately demonstrate LEAs' capacity to serve proposed Reading First schools, including identifying schools to be served and the criteria used by the LEA in their selection. | <p>The proposal:</p> <ul style="list-style-type: none"> Provides names of Reading First selected schools with highest percentage of children reading below grade level and highest percentage of children living in poverty. Describes criteria used to identify schools selected, justifying selections with descriptions of poverty level data, school status in assessment results, school demographics (e.g., number and percentage of ELL students). Demonstrates capacity to manage and support the number of schools selected including private schools. Demonstrates meaningful consultation with all private schools in the LEA. | <p>The proposal:</p> <ul style="list-style-type: none"> Meets all conditions listed under "Meets Standards." Describes criteria used to identify schools not selected. Describes additional justification for Reading First school selection, such as class size and student-teacher/paraprofessional ratio, school size, school leaders and teachers trained in scientifically-based reading research, rate of teacher turnover, pupil and teacher attendance rates, existence of foundation literacy programs such as EvenStart & Prek, existence of full kindergarten, daily schedule includes 90-minute reading block, consistency of school leadership, school leadership training in scientifically-based reading research. |

| (ii) Instructional Assessments - 10 Points | | |
|---|---|--|
| Does Not Meet Standards 0 points | Meets Standards 1-8 points | Exemplary 9-10 points |
| <p>The proposal:</p> <ul style="list-style-type: none"> Proposal inadequately demonstrates how LEAs and schools will use valid and reliable screening, diagnostic, classroom based and outcomes instructional assessments that are aligned with the instructional program. | <p>The proposal:</p> <ul style="list-style-type: none"> Identifies screening, diagnostic, progress monitoring, and outcomes assessments according to New York State Education Department requirements <p>Provides evidence that selected assessments are valid and reliable, appropriate for the identified purpose, grade level and skill mastery to be measured, and are grounded in SBRR</p> <p>Demonstrates establishment of a Student Data System that includes: a time line for assessment administration; designated personnel for collecting and analyzing data; provisions for student intervention in response to assessment results; evidence of LEA oversight and support; and plan for collection, organization, dissemination, and submission of data</p> <p>Identifies a qualified administrator responsible for the fulfillment of the Student Data System at the school level</p> | <p>The proposal:</p> <ul style="list-style-type: none"> Meets all conditions listed under 'Meets Standard.' Describes how information from valid and reliable screening, diagnostic, and classroom-based assessments will be used to make instructional decisions for K-3 students and to inform decisions about appropriate interventions. Provides a detailed plan for appropriate instructional modifications and interventions as a result of progress monitoring assessments, including adjustments in programs, strategies, and materials and more frequent monitoring of student progress. Describes in-depth plan for more frequent progress monitoring of children who are performing below grade level. Describes plan for use of program-specific assessments. |

| (ii) Instructional Assessments (continued) - 10 Points | | |
|---|--|----------------------------------|
| Does Not Meet Standards 0 points | Meets Standards 1-8 points | Exemplary 9-10 points |
| The proposal: | The proposal: <ul style="list-style-type: none"> • Provides evidence that assessments are aligned with the Reading First instructional program • Describes plan for submitting interim assessment data in quarterly reports to Regional School Support Centers and summative data to the New York State Education Department • Describes how data from assessments will be used to make effective educational decisions that will ensure student progress in acquiring the knowledge and skills in the five essential components of reading | The proposal: |

| (iii) Instructional Strategies and Programs - 15 Points | | |
|---|---|--|
| Does Not Meet Standards 0 points | Meets Standards 1-12 points | Exemplary 13-15 points |
| <p>The proposal:</p> <ul style="list-style-type: none"> Proposed procedure will result in LEAs and schools: <ul style="list-style-type: none"> implementing instructional strategies not based on SBRR; selecting and implementing reading programs that lack a scientific research base that meets rigorous and clearly defined standards; selecting and implementing reading programs that are not complete for use as a comprehensive instructional program; selecting and implementing reading programs that meet the instructional needs of only some students, leaving the needs of other students to be met elsewhere or at other times; using instructional strategies and programs that do not teach the five essential components of reading; using instructional strategies and programs that will enable students to reach only a basic level of reading ability; | <p>The proposal:</p> <ul style="list-style-type: none"> Describes procedures that will result in the LEA and schools: <ul style="list-style-type: none"> (a) Implementing instructional strategies based on SBRR; (b) Selecting and implementing scientifically based comprehensive reading programs that provide instruction to all K-3 students; (c) using instructional strategies and programs that teach the five essential components of reading; (d) using instructional strategies and programs that will enable students to reach the level of reading proficiency; (e) implementing a clear and specific plan to use scientifically based instructional strategies to accelerate performance and monitor progress of students who are reading below grade level; (f) selecting and implementing scientifically based comprehensive reading programs, without layering selected programs on top of non-research based programs already in use. | <p>The proposal:</p> <ul style="list-style-type: none"> Meets all conditions listed under "Meets Standards" Describes a plan for the use of instructional strategies and programs that teach the five components of reading, include explicit and systematic instructional strategies, have a coordinated instructional sequence, are aligned with instructional materials, and allow ample practice opportunities <p>Proposal meets all conditions listed under 'Meets Standard.'</p> <ul style="list-style-type: none"> Describes plan for aligning scientifically based reading programs with state standards to ensure that students reach the level of proficiency or better on state reading/language arts assessments; <p>Identifies gaps in selected Reading First programs and plans for supplementation</p> |

| (iii) Instructional Strategies and Programs (continued) - 15 Points | | |
|--|---|-----------------------------------|
| Does Not Meet Standards 0 points | Meets Standards 1-12 points | Exemplary 13-15 points |
| The proposal: using instructional strategies that teach students to use context or picture cues as primary means for word identification; relying primarily on instructional strategies that engage students in independent, silent reading with minimal guidance and feedback | The proposal: <ul style="list-style-type: none"> • Describes process for evaluating and selecting Reading First programs and materials • Provides list of supplemental and intervention programs with rationale for selection based on SBRR • Provides documentation that supplemental and intervention programs and strategies are grounded in SBRR and reviewed for evidence of effectiveness from evaluation studies with similar populations • Describes instructional applications of programs and strategies, with emphasis on the characteristics of a Reading First classroom and use of materials in their intended manner • Describes commitment to scheduling daily 90-minute blocks with significant additional time for instructional intervention and for schools that are not progressing • Describes instructional applications of Reading First programs and strategies in Special Education (K-12) | The proposal: |
| <ul style="list-style-type: none"> • Does not provide list of Reading First programs and materials with rationale for selection • Does not provide list of supplemental and intervention programs with rationale for selection | | |

| (iii) Instructional Strategies and Programs (continued) - 15 Points | | |
|--|--|-----------------------------------|
| Does Not Meet Standards 0 points | Meets Standards 1-12 points | Exemplary 13-15 points |
| The proposal: | The proposal: | The proposal: |
| | <ul style="list-style-type: none"> • Describes plan for offering students explicit, systematic instruction in phonemic awareness (e.g., isolating and manipulating the sounds in words); phonics (e.g., blending sounds, using texts that allow students to practice their phonics knowledge); fluency (e.g., assisted, repeated oral reading); comprehension (e.g., summarizing text, graphic and semantic organizers, asking and answering questions, summarization); and vocabulary (e.g., repeated exposure to the meaning of words in varieties of contexts) • Describes instructional strategies for intervention including more explicit strategies, coordinated instructional sequence, and increased practice and assessments | |

| (iv) Instructional Materials - 10 Points | | |
|--|---|---|
| Does Not Meet Standards 0 points | Meets Standards 1-8 points | Exemplary 9-10 points |
| <p>The proposal:</p> <ul style="list-style-type: none"> Describes procedures that would result in LEAs and schools: using instructional strategies not based on SBRR; not aligning additional instructional materials with the comprehensive reading program; using instructional materials that are not compatible with the comprehensive reading program; not using instructional materials for their intended purpose (e.g., using supplemental materials as the comprehensive reading program). <p>Does not provide list of Reading First instructional materials with rationale for selection</p> <p>Does not provide list of supplemental and intervention materials with rationale for selection</p> <p>Does not provide documentation that supplemental and intervention materials are grounded in SBRR</p> <ul style="list-style-type: none"> Does not describe plan for offering students explicit, systematic instruction in the five components of reading instruction | <p>The proposal:</p> <p>Provides list of instructional materials with rationale for selection based on SBRR</p> <p>Describes process for evaluating and selecting Reading First instructional materials</p> <ul style="list-style-type: none"> Provides list of supplemental and intervention materials with rationale for selection based on SBRR Provides documentation that supplemental and intervention materials and strategies are grounded in SBRR and reviewed for evidence of effectiveness from evaluation studies with similar populations Describes instructional applications of materials, with emphasis on the characteristics of a Reading First classroom and use of materials in their intended manner Describes instructional applications of Reading First materials in Special Education (K-12) Ensures that preservice teachers will use instructional materials grounded in SBRR | <p>The proposal:</p> <p>Proposal meets all conditions listed under 'Meets Standard.'</p> <ul style="list-style-type: none"> Describes a plan for the use of using instructional materials that teach the five components of reading, include explicit and systematic instructional strategies, have a coordinated instructional sequence, are aligned with the comprehensive reading program and allow ample practice opportunities; Describes a plan for aligning scientifically based reading materials with state standards to ensure that students reach the level of proficiency or better on state reading/language arts assessments; Identifies gaps in selected Reading First materials and plans for supplementation Describes an in-depth plan for how intervention materials will be used to accelerate the performance of children who begin the year performing below grade level. |

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| (iv) Instructional Materials (continued) - 10 Points | | |
|---|---------------------------------------|----------------------------------|
| Does Not Meet Standards 0 points | Meets Standards 1-8 points | Exemplary 9-10 points |
| The proposal: | The proposal: | The proposal: |

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|--|---|--|
| <p>Does not describe application of instructional materials</p> <p>Does not describe instructional materials used for intervention</p> <p>Does not ensure that preservice teachers will use instructional materials grounded in SBRR</p> | <p>Describes plan for offering students explicit, systematic instruction in phonemic awareness (e.g., isolating and manipulating the sounds in words); phonics (e.g., blending sounds, using texts that allow students to practice their phonics knowledge); fluency (e.g., assisted, repeated oral reading); comprehension (e.g., summarizing text, graphic and semantic organizers, asking and answering questions, summarization); and vocabulary (e.g., repeated exposure to the meaning of words in varieties of contexts)</p> <ul style="list-style-type: none"> • Describes instructional materials used for intervention that include more explicit strategies, coordinated instructional sequence, and increased practice | |
|--|---|--|

| (v) Instructional Leadership - 10 Points | | |
|--|--|--|
| Does Not Meet Standards 0 points | Meets Standards 1-8 points | Exemplary 9-10 points |
| <p>The proposal:</p> <ul style="list-style-type: none"> Does not adequately demonstrate LEAs and schools: <ul style="list-style-type: none"> Having designated individuals with clearly defined duties and responsibilities to provide instructional leadership; providing training for principals and building leaders related to improving reading instruction; providing training for LEA personnel related to improving reading instruction. Does not provide evidence of Design Team Does not provide name and title of required collective bargaining unit representative on LEA and school-based Design Teams <p>Does not provide information about Tier II Building Coach</p> <p>Does not provide LEA leadership commitment to fully utilize the services of the Regional School Support Centers and Tier I Coaches</p> | <p>The proposal:</p> <p>Describes LEA and School Building Principal responsibilities that ensure implementation of Reading First in funded schools</p> <p>Describes title and responsibilities of LEA administrator/coordinator responsible for the design, implementation and oversight of Reading First, including demonstrated commitment to ensuring continuity of instructional leadership at the school level.</p> <p>Describes title and responsibilities of designated LEA administrator responsible for oversight of the Student Data System</p> <p>Describes qualifications, authority, and responsibilities of Tier II Building Coach in each Reading First school</p> <p>Provides evidence of LEA support to Reading First schools, including sufficient authority, time, resources, and expertise of instructional leaders</p> <p>Provides names and titles of LEA and School-based Design Teams, including evidence of required Design Team membership</p> | <p>The proposal:</p> <ul style="list-style-type: none"> Meets all conditions listed under 'Meets Standard.' Demonstrates commitment to ensuring mandatory training for principals and building leaders in the essential components of reading and the specific instructional programs and materials in use in their buildings, including the scientific base, implementation process and progress monitoring related to those programs and materials |

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| (v) Instructional Leadership (continued) - 10 Points | | |
|---|--|----------------------------------|
| Does Not Meet Standards 0 points | Meets Standards 1-8 points | Exemplary 9-10 points |
| The proposal: | The proposal: | The proposal: |
| | <p>Provides name and title of required collective bargaining unit representative on LEA and school-based Design Teams</p> <p>Describes responsibilities, training, and activities of Reading First Design Team, with documentation of SBRR knowledge and application of SBRR in decision-making</p> <p>Describes LEA commitment to fully utilize the services of the Regional School Support Centers and Tier I Coaches</p> <p>Describes LEA process for ensuring that each Reading First school is making sufficient progress</p> <p>Describes required professional development for instructional leaders, including required professional development to improve knowledge and skills related to SBRR and improving reading instruction, school-based reading programs, strategies and materials, and Reading First Classrooms.</p> | |

| (vi) District and School-Based Professional Development – 10 points | | |
|---|---|---|
| Does Not Meet Standards 0 points | Meets Standards 1-8 Points | Exemplary 9-10 points |
| <p>The proposal:</p> <ul style="list-style-type: none"> Does not provide a professional development plan or provides an inadequate plan and process for delivery of professional development Provides a professional development plan that is not adequately coordinated with classroom instruction Provides a professional development plan that uses single-event workshops as the main delivery mechanism for professional development Does not adequately describe how professional development will be provided to Special Education teachers (K-12) Does not provide evidence of LEA oversight of the design, implementation, and evaluation of Reading First professional development <p>Does not require providers to be trained and experienced in SBRR</p> | <p>The proposal:</p> <p>Provides evidence of LEA oversight of the design, implementation, and evaluation of Reading First professional development</p> <p>Provides an LEA professional development plan as part of the Reading First Design Team activities based on the five essential components of reading and classroom instruction grounded in SBRR with a clear process of delivery</p> <ul style="list-style-type: none"> Provides an LEA professional development plan that offers a full range of professional development experiences that are intensive, focused and of sufficient duration to achieve the purposes and goals of the training and provides adequate time for study, observation, practice, application, and evaluation <p>Describes Reading Academy implementation and participation levels, including required participation by all Reading First Teachers and school principals</p> <p>Describes provision of additional professional development for teachers who require intensive, targeted training and support</p> | <p>The proposal:</p> <ul style="list-style-type: none"> Proposal meets all conditions listed under 'Meets Standard.' Provides detailed plan with a detailed schedule and explicit means for assessing the specific professional development needs of the teachers and designing professional development around those needs, or results of needs assessment <p>Provides detailed plan for coordinating LEA professional development with New York State Education Department activities related to improving reading achievement</p> <ul style="list-style-type: none"> Provides description of specific LEA professional development topics and qualified providers |

| (vi) District and School-Based Professional Development (continued) - 10 Points | | |
|--|--|----------------------------------|
| Does Not Meet Standards 0 points | Meets Standards 1-8 points | Exemplary 9-10 points |
| The proposal: | The proposal: | The proposal: |
| | <ul style="list-style-type: none"> • Describes professional development participation requirements, including K-12 Special Education teachers and individualized professional development plans • Describes requirement for all professional development providers to be highly qualified to train on the topic of classroom application of SBRR • Describes required participation in Regional School Support Center and LEA professional development programs, including training on required assessments • Describes required professional development for LEA instructional Leaders and Tier II Building Coaches <p>Describes LEA ongoing development and support to those serving as trainers and coaches, including training on coaching skills and Reading First implementation for Instructional Leadership and Tier II Building Coaches</p> <p>Describes professional development on state reading assessments and standards and their linkage to Reading First</p> | |

| (vii) District –Based Technical Assistance - 10 Points | | |
|---|--|--|
| Does Not Meet Standards 0 points | Meets Standards 1-8 points | Exemplary 9-10 points |
| <p>The proposal:</p> <p>Does not have a Technical Assistance plan or has an inadequate plan to provide technical assistance to Reading First schools</p> <p>Does not assure that technical assistance will be provided by Instructional Leadership who have training and experience in SBRR</p> | <p>The proposal:</p> <p>Describes LEA plan for providing high quality technical assistance related to the implementation of Reading First to selected schools, and will coordinate with the Regional School Support Centers to provide the assistance</p> <p>Describes LEA plan for providing technical assistance to schools in implementing and evaluating their Reading First programs</p> <p>Provides assurance that LEA will provide appropriate technical assistance to facilitate achievement</p> <p>Describes how technical assistance will be provided by Instructional Leadership who have training and experience in SBRR</p> <p>Describes collaboration with Regional School Support Centers and Tier I Regional Coaches and Assessment Specialists</p> <p>Describes LEA plans for providing technical assistance in response to quarterly reports to the Regional School Support Centers</p> <p>Describes LEA technical assistance related to the Student Data System</p> | <p>The proposal:</p> <p>Proposal meets all conditions listed under 'Meets Standard.'</p> <p>Describes how LEAs will provide high quality technical assistance to Reading First schools as related to setting goals and benchmarks.</p> |

| (viii) Evaluation Strategies - 10 Points | | |
|--|---|--|
| Does Not Meet Standards 0 points | Meets Standards 1-8 points | Exemplary 9-10 points |
| <p>The proposal:</p> <p>Does not have a clear plan to document the effectiveness of LEA Reading First activities for individual schools and the LEA as a whole</p> <p>Does not have a clear plan to make decisions based on evaluation outcomes, including interventions with and/or discontinuation of schools not making significant progress.</p> | <p>The proposal:</p> <p>Describes LEA plan to document the effectiveness of local Reading First activities for individual schools and the LEA as a whole.</p> <p>Describes LEA plan to report reading achievement data disaggregated by low-income, major racial/ethnic groups, LEP, and special education for K-3 students in Reading First schools.</p> <p>Describes incorporation of Student Data System in the LEA Evaluation plan</p> <p>Describes LEA plan for intervention <i>and/or discontinuation</i> when Reading First schools are not making progress in reading achievement</p> | <p>The proposal:</p> <ul style="list-style-type: none"> • Proposal meets all conditions listed under 'Meets Standard.' • Specifically describes the valid and reliable measures LEA has selected to use to document the effectiveness of LEA Reading First activities for individual schools and the LEA as a whole <p>Describes how LEAs will use valid and reliable data to report reading achievement data, using valid and reliable measures, disaggregated by low-income, major racial/ethnic groups, LEP, and special education for K-3 students in Reading First schools.</p> <p>Describes detailed plan for intervention when Reading First schools are not making progress in reading achievement</p> |

| (ix) Access to Print Materials - 5 Points | | |
|--|---|--|
| Does Not Meet Standards 0 points | Meets Standards 1-4 points | Exemplary 5 points |
| <p>The proposal: Does not adequately describe how LEAs will promote reading and library programs that provide student access to engaging reading materials</p> | <p>The proposal: Describes how LEA will assess the need for print materials and an environment conducive to reading comfortably Describes how LEA will promote reading and library programs that provide student access to engaging reading materials, including coordination with programs funded under the Improving Reading through School Libraries program, if applicable. Describes how LEA will ensure that Reading First schools have reading libraries with materials based on SBRR and provided by the LEA, community-based organizations, public libraries, and other literacy organizations</p> | <p>The proposal: Proposal meets all conditions listed under 'Meets Standard.' Describes how LEA will promote reading and library programs that provide student access to a wide array of engaging reading materials, including both expository and narrative texts. Describes how LEA will provide high quality reading instruction software (with sufficient hardware support) that will be aligned with SBRR and the Reading First program</p> |

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| (x) Additional Criteria - 0 Points | | |
|---|------------------------|------------------|
| Does Not Meet Standards | Meets Standards | Exemplary |
| Not applicable – New York State has chosen not to apply additional criteria | | |

(xi) Competitive Priorities - 7 Points

1. Score 1 point if the LEA has 6,500 students from families below the poverty line or 15% of the students served are from families with incomes below the poverty line
2. Score 1 point if 20% or more of the PreK-12 students are identified as students with disabilities
3. Score 1 point if 20% or more of K-6 students have been identified as English language learners
4. Score 2 point if LEA already has a district-wide fully-implemented reading program based on SBRR
5. Score 2 point if LEA maintains K-3 class size at 20 or fewer students.

| (xii) Budget Narrative - 10 Points | | |
|--|---|--|
| Does Not Meet Standards 0 points | Meets Standards 1-8 points | Exemplary 9-10 points |
| <p>The proposal:</p> <p>Demonstrates an inadequate allocation of resources to achieve Reading First goals</p> <p>Includes expenditures that are not allowable</p> <p>Does not include funding for one or more planned project activities</p> | <p>The proposal:</p> <ul style="list-style-type: none"> Provides a detailed narrative of proposed expenditures aligned with the planned project activities Demonstrates that the proposed allocation of resources will be sufficient to successfully implement the LEA's Reading First Plan. Includes a detailed budget justification that clearly demonstrates the feasibility of the LEA plan. | <p>The proposal:</p> <ul style="list-style-type: none"> Meets all conditions listed under "Meets Standards" Describes how the LEA will coordinate Reading First with other available funding streams |

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2005-2006 LEA Proposal Review Summary Sheet

LEA NAME:

REVIEW TEAM:

RECOMMENDED SCORE:

| Proposal Category | Does Not Meet Standard | Meets Standard Recommended Score | Exemplary Recommended Score |
|---|------------------------|----------------------------------|-----------------------------|
| (i) Schools to be served | | | |
| (ii) Instructional Assessments | | | |
| (iii) Instructional Strategies and Programs | | | |
| (iv) Instructional Materials | | | |
| (v) Instructional Leadership | | | |
| (vi) District and School-based Professional Development | | | |
| (vii) District-based Technical Assistance | | | |
| (viii) Evaluation Strategies | | | |
| (ix) Access to Print Materials | | | |
| (x) Budget Narrative | | | |
| TOTAL = | | | |

✓ COMMENTS:

**Analysis Of NYSED Scoring Rubric
With ESEA 1202 c (7)(A) I – vii**

| Seven Required Components of ESEA 1202 | Section in NYS Rubric where ESEA Component Was Addressed |
|---|---|
| (i) Selecting and administering screening, diagnostic and classroom-based instructional reading assessments | <ul style="list-style-type: none"> • Demonstrates that all screening, diagnostic, progress monitoring, and outcomes assessments will be implemented according to New York State Education Department requirements • Provides evidence that selected diagnostic assessments are valid and reliable, appropriate for the identified purpose, grade level and skill mastery to be measured, and are grounded in SBRR • Demonstrates establishment of a student data system that includes: a time line for assessment administration; designated personnel for collecting and analyzing data; provisions for student intervention in response to assessment results; evidence of LEA oversight and support; and plan for collection, organization, dissemination, and submission of data • Identifies a qualified administrator responsible for the implementation of the student data system at the school level • Provides evidence that assessments are aligned with the Reading First instructional program • Describes plan for submitting interim assessment data in quarterly reports to Regional School Support Centers and summative data to the New York State Education Department • Describes how data from assessments will be used to make effective educational decisions that will ensure student progress in acquiring the knowledge and skills in the five essential components of reading |
| (ii) Selecting and implementing a learning system or | <ul style="list-style-type: none"> • Describes procedures that will result in the LEA and schools: <ul style="list-style-type: none"> (a) Implementing instructional strategies based on SBRR; (b) Selecting and implementing scientifically based comprehensive reading programs that |

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| <p>program of reading instruction based on scientifically based reading research that- (I) includes the essential components of reading instruction; and (II) provides such instruction to the children in kindergarten through grade 3 in the schools served by the eligible LEA...</p> | <p>provide instruction to all K-3 students;</p> <p>(c) using instructional strategies and programs that teach the five essential components of reading;</p> <p>(d) using instructional strategies and programs that will enable students to reach the level of reading proficiency;</p> <p>(e) implementing a clear and specific plan to use scientifically based instructional strategies to accelerate performance and monitor progress of students who are reading below grade level;</p> <p>(f) selecting and implementing scientifically based comprehensive reading programs, without layering selected programs on top of non-research based programs already in use.</p> <ul style="list-style-type: none"> • Describes process for evaluating and selecting Reading First programs and materials • Provides list of supplemental and intervention programs with rationale for selection based on SBRR • Provides documentation that supplemental and intervention programs and strategies are grounded in SBRR and reviewed for evidence of effectiveness from evaluation studies with similar populations • Describes instructional applications of programs and strategies, with emphasis on the characteristics of a Reading First classroom and use of materials in their intended manner • Describes commitment to scheduling daily 90-minute blocks with significant additional time for instructional intervention and for schools that are not progressing • Describes instructional applications of Reading First programs and strategies in Special Education • Describes plan for offering students explicit, systematic instruction in phonemic awareness (e.g., isolating and manipulating the sounds in words); phonics (e.g., blending sounds, using texts that allow students to practice their phonics knowledge); fluency (e.g., assisted, repeated oral reading); comprehension (e.g., summarizing text, graphic and semantic organizers, asking and answering questions, summarization); and vocabulary (e.g., repeated exposure to the meaning of words in varieties of contexts) • Describes instructional strategies for intervention including more explicit strategies, coordinated instructional sequence, and increased practice and assessments |
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| | |
| <p>(iii) Procuring and implementing instructional materials, including education technology such as software and other digital curricula, that are based on sbrr</p> | <ul style="list-style-type: none"> • Provides list of instructional materials with rationale for selection based on SBRR • Describes process for evaluating and selecting Reading First instructional materials • Provides list of supplemental and intervention materials with rationale for selection based on SBRR • Provides documentation that supplemental and intervention materials and strategies are grounded in SBRR and reviewed for evidence of effectiveness from evaluation studies with similar populations • Describes instructional applications of materials, with emphasis on the characteristics of a Reading First classroom and use of materials in their intended manner • Describes instructional applications of Reading First materials in Special Education • Ensures that preservice teachers will use instructional materials grounded in SBRR • Describes plan for offering students explicit, systematic instruction in phonemic awareness (e.g., isolating and manipulating the sounds in words); phonics (e.g., blending sounds, using texts that allow students to practice their phonics knowledge); fluency (e.g., assisted, repeated oral reading); comprehension (e.g., summarizing text, developing graphic and semantic organizers, asking and answering questions, summarization); and vocabulary (e.g., repeated exposure to the meaning of words in varieties of contexts) • Describes instructional materials used for intervention that include more explicit strategies, coordinated instructional sequence, and increased practice |
| <p>(iv) Providing professional development for teachers of kindergarten through grade 3, and special education teachers of kindergarten through grade 12.that i. (I) will prepare these</p> | <ul style="list-style-type: none"> • Provides evidence of LEA oversight of the design, implementation, and evaluation of Reading First professional development • Provides an LEA professional development plan as part of the Reading First Design Team activities based on the five essential components of reading and classroom instruction grounded in SBRR with a clear process of delivery • Provides an LEA professional development plan that offers a full range of professional development experiences that are intensive, focused and of sufficient duration to achieve |

| | |
|---|--|
| <p>ii. teachers in all of the essential components of reading instruction' (II) shall include –</p> <p>a. (aa) information on instructional materials, programs, strategies and approaches based on scientifically based reading research, including early intervention, classroom reading materials and remedial programs and approaches and</p> <p>b. (bb) instruction in the use of screening, diagnostic and classroom based instructional reading assessments and other procedures that effectively identify students who may be at risk for reading failure</p> | <p>the purposes and goals of the training and provides adequate time for study, observation practice, application, and evaluation</p> <ul style="list-style-type: none"> • Describes Reading Academy implementation and participation levels, including required participation by all Reading First Teachers and school principals • Describes provision of additional professional development for teachers who require intensive, targeted training and support • Describes professional development participation requirements, including K-12 Special Education teachers and individualized professional development plans • Describes requirement for all professional development providers to be highly qualified to provide information on the topic of classroom application of SBRR • Describes required participation in Regional School Support Center and LEA professional development programs, including workshops on required assessments • Describes required professional development for LEA instructional Leaders and Tier II Building Coaches • Describes LEA ongoing development and support to those serving as trainers and coaches, including professional development sessions on coaching skills and Reading First implementation for Instructional Leaders and Building Coaches • Describes professional development on state reading assessments and standards and their linkage to Reading First |
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| <p>or who are having reading difficulty</p> <p>iii. (III) shall be provided by eligible professional development providers</p> <p>iv. (IV) will assist teachers in becoming highly qualified in reading instruction in accordance with section 1119</p> | |
| <p>(V) Collecting and summarizing data</p> <p>i. (I) to document the effectiveness of activities carried out under this subpart in individual schools and in the LEA as a whole</p> <p>ii. (II) to stimulate and accelerate improvement by identifying the schools that produce significant gains in reading achievement</p> | <ul style="list-style-type: none"> • Demonstrates establishment of a student data system that includes: a time line for assessment administration; designated personnel for collecting and analyzing data; provisions for student intervention in response to assessment results; evidence of LEA oversight and support; and plan for collection, organization, dissemination, and submission of data • Identifies a qualified administrator responsible for the implementation of the student data system at the school level • Provides evidence that assessments are aligned with the Reading First instructional program • Describes how data from assessments will be used to make effective educational decisions that will ensure student progress in acquiring the knowledge and skills in the five essential components of reading • Describes an in-depth plan for how intervention materials will be used to accelerate the performance of children who begin the year performing below grade level. |
| <p>(VI) Reporting data for all students and categories of students described previously</p> | <ul style="list-style-type: none"> • Describes plan for submitting interim assessment data in quarterly reports to Regional School Support Centers and summative data to the New York State Education Department |
| <p>(VII) Promoting reading and library programs that provide</p> | <ul style="list-style-type: none"> • Describes how LEA will promote reading and library programs that provide student access to engaging reading materials, including coordination with programs funded under the |

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| access to engaging reading material, including coordination with programs funded through grants received under subpart 4 | Improving Reading through School Libraries program, if applicable. <ul style="list-style-type: none">• Describes how LEA will ensure that Reading First classrooms have reading libraries with a wide range of engaging reading materials based on SBRR |
|--|---|

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READING FIRST

REVIEWER NOTES / WORKSHEETS

DISTRICT NAME: _____

REVIEW TEAM: _____

REVIEWER NAME: _____

In order to "Meet Standard," the proposal must address listed items within each category. Reviewers will determine an aggregate number of points to be awarded for the category. The points awarded must be within the indicated maximum.

Proposals that do not address each listed item in the category must be rated "Does Not Meet Standard."

(i) **Schools to be Served**

Meets Standard: 1-8 points

- ___ Names schools with highest percentage of children reading below grade level and highest percentage of children living in poverty
- ___ Describes criteria used to select schools, including poverty data, assessment results, student demographics
- ___ Clearly demonstrates district capacity to support implementation in the number of selected schools, including private schools
- ___ Demonstrates meaningful consultation w/private schools (not applicable if no private schools located in attendance zones of Reading First buildings)

COMMENTS:

Exemplary: 1-2 points

- ___ Describes rationale and criteria used to identify schools not selected for Reading First

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- _____ Describes additional detailed objective and relevant criteria used to select schools (class size; student/teacher-paraprofessional ratio, school size, school leadership and teacher expertise in SBRR, rate of teacher turnover, pupil and teacher attendance rates, existence of foundational literacy programs such as Even Start, Prekindergarten, full day Kindergarten, etc.)

COMMENTS:

RECOMMENDED SCORE

- _____ **Does Not Meet Standard**
- _____ **Meets Standard Points Recommended**
- _____ **Exemplary Points Recommended**

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(ii) **Instructional Assessments**

Meets Standard: 1-8 points

- ___ Identifies assessments to be used for screening, progress monitoring, diagnostic and outcome evaluation at each grade level (K,1,2,3,)
- ___ Provides documentation that selected assessment instruments are reliable and valid and appropriate for purpose, skill to be evaluated and grade level of application
- ___ Provides evidence that assessments are aligned with Reading First instructional program
- ___ Time line for administration of assessments is clear and appropriate
- ___ Identifies district protocol for the collection, analysis and application of data and provisions for intervention in response to results
- ___ Describes how assessment data will be used to make educational decisions at student, classroom, program levels
- ___ Identifies qualified person(s) who will have overall responsibility for Data System at school and district levels
- ___ Describes plan for management of reporting requirements (i.e. quarterly reports, annual reports)

COMMENTS:

Exemplary: 1-2 points

- ___ Provides detailed description of how assessment data will be used to make instructional decisions and plan interventions for students
- ___ Provides a detailed plan for appropriate instructional modifications and interventions as a result of progress monitoring assessments, including adjustments in programs, strategies and materials and more frequent monitoring of student progress

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- Describes in-depth plan for more frequent progress monitoring for students who are struggling
- Describes plan for use of program-specific assessments

COMMENTS:

RECOMMENDED SCORE

- Does Not Meet Standard**
- Meets Standard Points Recommended**
- Exemplary Points Recommended**

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(iii) **Instructional Strategies and Programs**

Meets Standard: 1-12 points

- Describes procedures that will result in the LEA and schools:
 - (a) implementing instructional strategies based on SBRR;
 - (b) selecting and implementing scientifically based comprehensive reading programs that provide instruction to all K-3 students;
 - (c) using instructional strategies and programs that teach the five essential components of reading;
 - (d) using instructional strategies and programs that will enable students to reach the level of reading proficiency;
 - (e) implementing a clear and specific plan to use scientifically based instructional strategies to accelerate performance and monitor progress of students who are reading below grade level;
 - (f) selecting and implementing scientifically based comprehensive reading programs, without layering selected programs on top of non-research based programs already in use.

- Describes process for evaluating and selecting Reading First programs and materials

- Provides list of supplemental and intervention programs with rationale for selection based on SBRR

- Provides documentation that supplemental and intervention programs and strategies are grounded in SBRR and reviewed for evidence of effectiveness from evaluation studies with similar populations

- Describes instructional applications of programs and strategies, with emphasis on the characteristics of a Reading First classroom and use of materials in their intended manner

- Describes commitment to scheduling daily 90-minute blocks with significant additional time for instructional intervention and for schools that are not progressing

- Describes instructional applications of Reading First programs and strategies in Special Education (K-12)

- Describes plan for offering students explicit, systematic instruction in phonemic awareness (e.g., isolating and manipulating the sounds in words); phonics (e.g., blending sounds, using texts that allow students to practice their phonics knowledge); fluency (e.g., assisted, repeated oral reading); comprehension (e.g., summarizing text, graphic and semantic organizers, asking and answering

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questions, summarization); and vocabulary (e.g., repeated exposure to the meaning of words in varieties of contexts)

- Describes instructional strategies for intervention including more explicit strategies, coordinated instructional sequence, and increased practice and assessments

COMMENTS:

Exemplary: 1-2 points

- Describes a detailed plan for alignment of Reading First programs and strategies with NYS standards
- Demonstrates awareness of possible gaps in Reading First strategies and program and plans for augmentation

COMMENTS:

RECOMMENDED SCORE

- ___ **Does Not Meet Standard**
- ___ **Meets Standard Points Recommended**
- ___ **Exemplary Points Recommended**

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(iv) **Instructional Materials**

Meets Standard: 1-8 points

- ___ Provides list of instructional materials with rationale for selection based on SBRR
- ___ Describes process for evaluating and selecting Reading First instructional materials
- ___ Provides list of supplemental and intervention materials with rationale for selection based on SBRR
- ___ Provides documentation that supplemental and intervention materials are grounded in SBRR and reviewed for evidence of effectiveness from evaluation studies with similar populations
- ___ Describes instructional applications of materials with emphasis on the characteristics of a Reading First classroom and use of materials in their intended manner
- ___ Describes instructional applications of materials with special education students or other special populations
- ___ Ensures that preservice teachers will use instructional materials grounded in SBRR
- ___ Describes instructional materials used for interventions with struggling readers (more explicit strategies, increased practice opportunities)

COMMENTS:

Exemplary: 1-2 points

- ___ Describes a detailed plan for the use of instructional materials to teach the components of reading, include explicit and systematic instructional strategies, have a coordinated instructional sequence, and are aligned with the comprehensive reading program
- ___ Describes a plan for aligning reading materials with NYS standards

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- Identifies gaps in selected Reading First materials and plans for supplementation
- Describes an in-depth plan for use of intervention materials to accelerate student performance for struggling readers

COMMENTS:

RECOMMENDED SCORE

- Does Not Meet Standard**
- Meets Standard Points Recommended**
- Exemplary Points Recommended**

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(v) **Instructional Leadership**

Meets Standard: 1-8 points

- ___ Describes plan for LEA and Building leadership responsibilities in implementation of Reading First
- ___ Describes title and responsibilities of LEA administrator/coordinator with responsibility for design, implementation and oversight of Reading First
- ___ Describes title and responsibilities of designated LEA administrator with responsibility for oversight of Student Data System
- ___ Describes responsibilities of Reading First building principal in implementation of Reading First
- ___ Describes qualifications, authority and responsibilities of Reading First Building Coach
- ___ Provides evidence of LEA support to Reading First schools, including sufficient authority, times, resources and expertise of instructional leaders
- ___ Provides names and titles of District and Building Design Team membership
- ___ Provides name and title of collective bargaining unit representative on LEA and school Design Teams
- ___ Describes responsibilities and activities of Reading First Design teams, with documentation of knowledge of SBRR and application in planning for Reading First
- ___ Describes LEA commitment to utilize services of RSSC and Regional Coaches
- ___ Describes LEA process for monitoring process in Reading First schools
- ___ Describes professional development planned for LEA and building leadership

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Exemplary: 1-2 points

- Demonstrates commitment to ensuring mandatory professional development for principals and building leaders in research-based reading instruction and the specific instructional programs and materials to be used in Reading First

COMMENTS:

RECOMMENDED SCORE

- Does Not Meet Standard
- Meets Standard Points Recommended
- Exemplary Points Recommended

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(vi) **Professional Development**

Meets Standard: 1-8 points

- ___ Provides evidence of LEA oversight of the design, implementation and evaluation of Reading First professional development
- ___ Provides a professional development plan developed by Design Team and based on Reading First principles
- ___ Provides a professional development plan that offers a full range of professional development experiences that are intensive, focused and of sufficient duration to achieve the intended purposes and goals. Professional development plan provides adequate time for study, observation, practice, application and evaluation.
- ___ Describes plans for participation in New York State Reading Academy
- ___ Describes provision and plans for additional professional development for teachers who require it
- ___ Describes professional development participation requirements, including teacher professional development plans and participation of special education teachers
- ___ Describes process of identifying professional development providers who are highly qualified in SBRR
- ___ Describes plans for participation and coordination with RSSC professional development
- ___ Describes professional development for all Reading First LEA and building leadership
- ___ Describes professional development specific to Building Coaches
- ___ Describes professional development on Reading First linkage to NYS Standards and assessments

COMMENTS:

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Exemplary: 1-2 points

- Provides a detailed plan for explicit needs assessment of teacher professional development and application of needs assessment results in professional development plans
- Provides a detailed plan for coordination of LEA professional development with NYSED professional development activities for improving reading achievement

COMMENTS:

RECOMMENDED SCORE

- **Does Not Meet Standard**
- **Meets Standard Points Recommended**
- **Exemplary Points Recommended**

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(vii) **Technical Assistance**

Meets Standard: 1-8 points

- ___ Describes LEA plan for providing high quality technical assistance relating to the implementation of Reading First in selected schools
- ___ Describes LEA plan for providing technical assistance to selected schools in evaluation of Reading First program
- ___ Provides assurance that LEA will provide technical assistance to facilitate student achievement
- ___ Describes how technical assistance will be provided by leadership with knowledge of SBRR
- ___ Describes how technical assistance will be coordinated with RSSC, Regional Coaches and Assessment Specialists
- ___ Describes LEA plan for provision of technical assistance in response to quarterly progress reports prepared with RSSC
- ___ Describes plans to provide LEA technical assistance related to implementation of the Student Data System

COMMENTS:

Exemplary: 1-2 points

- ___ Provides detailed description of how LEAs will provide high quality technical assistance to selected schools as related to setting goals and benchmarks

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RECOMMENDED SCORE

_____ **Does Not Meet Standard**

_____ **Meets Standard Points Recommended**

_____ **Exemplary Points Recommended**

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(viii) **Evaluation Strategies**

Meets Standard: 1-8 points

- ___ Describes LEA plan to document effectiveness of Reading First program, at LEA and building level
- ___ Describes LEA plan to report reading achievement data disaggregated by income, ethnicity, and special student needs such as LEP and SWD
- ___ Describes incorporation of Student Data System in evaluation plan
- ___ Describes LEA plan for intervention and/or discontinuation plans for Reading First schools that are not making progress in student reading achievement

COMMENTS:

Exemplary: 1-2 points

- ___ Specifies valid and reliable instruments selected by the LEA to document the effectiveness of the Reading First program in selected schools and in the LEA
- ___ Describes how the LEA will use valid and reliable data to report disaggregated achievement progress
- ___ Describes detailed plan for intervention for Reading First schools that are not making progress in student reading achievement

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RECOMMENDED SCORE

_____ **Does Not Meet Standard**

_____ **Meets Standard Points Recommended**

_____ **Exemplary Points Recommended**

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(ix) **Access to Print Materials**

Meets Standard: 1-4 points

- Describes process of assessment of need for print materials and an environment conducive to reading
- Describes how LEA will promote reading and library programs that provide student access to engaging reading materials, including coordination with other programs
- Describes how LEA will ensure that selected schools have reading libraries with adequate materials based on SBRR

COMMENTS:

Exemplary: 1 point

- Describes how LEA will promote reading and library programs that provide student access to a wide array of engaging reading materials
- Describes how LEA will provide high quality reading instruction software that will be aligned with SBRR and Reading First

COMMENTS:

RECOMMENDED SCORE

- Does Not Meet Standard**
- Meets Standard Points Recommended**
- Exemplary Points Recommended**

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(x) **Budget Narrative**

Meets Standard: 1-8 points

- Provides a detailed narrative of proposed expenditures aligned with planned project activities
- Demonstrates that the proposed allocation of resources is sufficient to successfully implement the Reading First program
- Includes a detailed budget justification that clearly demonstrates the feasibility of the LEA Reading First plan

COMMENTS:

Exemplary: 1-2 points

- Describes how the LEA will coordinate Reading First with other available funding streams

COMMENTS:

RECOMMENDED SCORE

- Does Not Meet Standard**
- Meets Standard Points Recommended**
- Exemplary Points Recommended**

Reading First 03-04; proposal review; rubric worksheet

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From Reading First Proposal Overview:

How will grants be awarded?

Upon receipt, each application will be reviewed to determine whether it was submitted by an eligible LEA. Only complete applications submitted by eligible LEAs will be accepted for further review, rating and award.

External panels of expert Reading First reviewers will formally evaluate the LEA subgrant proposals. Each review panel will include known experts (not limited to New York State) who have experience in using, studying or evaluating reading programs that are grounded in scientifically based reading research. All reviewers will be highly knowledgeable of scientifically based reading research and its application in high-poverty schools. Reviewers also will receive training by the New York State Education Department on the process of reviewing and awarding Reading First subgrants. The number of review panels established will be determined based on the number of proposals received. A panel of at least three members will review and evaluate each eligible application.

Each section of the LEA proposal will be rated using the criteria outlined in the Reading First Grant Scoring Rubric (see Appendix E of this Request for Proposals) to evaluate which applications meet the review standards. Each application will be read individually and scored by each review panel member. The reviewers will meet to achieve a consensus rating through discussion. The reviewers will use the rubric to determine the number of points to give each criterion. A total of 100 points may be awarded.

To be considered for funding, an LEA proposal must:

- receive a final score of 75 points or greater, including bonus points;
- be rated "Meets Standards" or "Exemplary" for all criteria. **If a proposal is rated "Does Not Meet Standards" for one or more criteria, it cannot be considered for funding; and**
- demonstrate commitment to implementing the Reading First program in accordance with federal and State guidelines by providing a Statement of Assurances signed by the Superintendent and principals of each school participating in the program.

All LEAs receiving a final consensus score of at least 75 points will be ranked from highest to lowest. Awards will be made in the full amount of the adjusted budget in rank order of score until funds allocated are insufficient to fund the next ranking district in full. In the event of a tie score in the LEA rankings, priority will be given in the following order:

1. the LEA with a higher score in the Reading First Grant Scoring Rubric Section iii – *Instructional Strategies and Programs*;
2. the LEA with a higher percentage of children in poverty based on the federal government calculations of 02-03 Title I Basic Grants.

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SCOPE OF THE SCHEDULE

This schedule provides retention and disposition authorizations for records commonly created and maintained by State Executive Branch agencies to support administrative, personnel, and fiscal activities. According to State law and regulation

Records means all books, papers, microforms, computer-readable materials, maps, photographs, film, video and sound recordings, or other documentary materials, regardless of physical form or characteristics, made or received by any agency or by the legislature or the judiciary in pursuance of law or in connection with the transaction of public business and preserved by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities, or because of the information contained therein.

This definition uses the following criteria:

- Format -- the definition includes all formats of material, including electronic records.
- Function -- created or received in pursuance of law or in conjunction with public business.
- Purpose -- preserved (i.e., retained) as evidence of organization, functions, policies, decisions, procedures, operations, or other government activities, or retained because of the information they contain.

The Arts and Cultural Affairs Law and SARA regulations exclude the following materials from the definition of records:

Library or museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of documents preserved only for convenience of reference, and stocks of publications and of blank forms do not constitute records under this definition.

Agency staff, with assistance from the agency Records Management Officer, should use sound judgment and apply consistent criteria when deciding whether recorded information constitutes records. A consistent approach to defining records ensures that agencies create or capture adequate documentation of their programs and operations for ongoing administrative purposes and helps to meet legal and audit requirements. Some examples of information that may be excluded from the definition of records include

- temporary drafts or personal notes that were not circulated, reviewed, or used to make decisions or complete transactions
- extra copies of documents that were created or distributed solely for reference purposes
- temporary files used solely to change the arrangement or format of electronic records
- electronic versions of documents, transactions, or reports, when the record is retained on paper or microfilm to provide evidence or for legal or audit purposes
- conversely, extra copies of correspondence, reports, and printouts when the record is retained in electronic form to provide evidence or for legal or audit purposes

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-- copies of files or extracts of databases created solely to transfer data between systems.

Decisions about which material constitutes a record should be documented in agency policies and procedures. The agency Records Management Officer and SARA staff can provide advice and assistance in distinguishing records from nonrecord material.

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Types of Records Covered by This Schedule

The schedule covers 212 records series. It is organized into 23 separate sections, each of which covers the records created or used to carry out a specific function. Each section begins with a short definition of the function, a listing of pertinent control agencies for the function, and then a summary schedule providing basic information on retention and disposition of the records covered by the section. The summary schedules are followed by more complete descriptions and other information specific to each records series in the section. The 23 sections cover the following functions:

Activity/Production Scheduling and Reporting -- Scheduling, planning, and reporting on routine or recurring activities in agencies or program units.

Administrative Analysis, Planning, and Procedures Development -- Analysis and planning activities carried out to identify and solve administrative problems and to develop operational procedures.

Affirmative Action -- Programs administered in compliance with various State and Federal requirements to ensure equal employment opportunities for and prevent discrimination against members of protected classes.

Budget Preparation -- Development and submission of annual agency budget requests.

Electronic Data Processing -- Activities undertaken by agencies to design, develop, and provide electronic data processing services.

Employee Relations -- Programs and activities that establish and implement the terms and conditions of employment in Executive Branch agencies.

Equipment, Supplies, and Motor Vehicle Management -- Activities intended to ensure efficient and effective control, use, and maintenance of State-owned property, equipment, and other resources, excluding real property or fixed assets.

Facilities Management -- Operation and maintenance of buildings or other facilities owned or leased by New York State.

Fiscal Operations -- Activities undertaken by agencies to manage, account for, collect, and expend funds (see also Payroll).

Forms Management -- Activities to control, standardize, design, create, and monitor use of forms.

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Health, Safety, and Security -- Monitoring and reporting agency compliance with health and safety standards, first aid and preventive health, regulation and monitoring of the environment in State facilities, storage and use of toxic and harmful substances, facility security, fire prevention and response, and disaster preparedness and response.

Internal Controls -- Methods and measures adopted within an agency to safeguard its assets, check the accuracy and reliability of its accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies.

Library Operations -- Acquisition and management of agency library collections, reference and research use, materials circulation, and interlibrary loan operations.

Mail and Messenger Services -- Use of interagency mail, private vendors, or the U.S. Postal Service for mail, message, and parcel pickup and delivery.

Minority and Women-Owned Business Development -- Activities intended to assist minorities and women to enter and remain in the mainstream of economic activities.

Office Administration -- Activities associated with the routine operation of most program units in State government.

Payroll -- Activities associated with preparation, issuance, and accounting for State employee compensation.

Personnel -- Recruitment and appointment of agency staff, monitoring and developing the agency work force, development and implementation of agency personnel policies and procedures, and administration of employee benefits programs.

Public Information -- Activities that provide information on agency programs and services, respond to inquiries from the public, disseminate information, and administer the Freedom of Information and Personal Privacy Protection laws.

Publication and Reproduction Services -- Publication, printing, photoduplication, and other forms of document reproduction for large-volume runs of publications and smaller quantities of documents for limited distribution.

Records Management -- Activities undertaken to improve the management of records and to comply with records management regulations.

Telecommunications (Voice and Fax) Management -- Planning, implementation, operation, and maintenance of telephone and other facilities for voice and fax communications.

Training -- Educational activities undertaken by agencies to help ensure a work force with the skills and knowledge sufficient to accomplish agency goals, and to offer employees opportunities for professional development.

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Records Not Covered by This Schedule

This schedule does not apply to the types of records listed below.

- **Records created or maintained by control and service agencies** that are used to carry out or document governmentwide approval, control, audit, or oversight responsibilities, or to provide centralized services to other agencies. These control and service agencies are identified specifically in the introductions to each major section of the schedule or in the *Records Not Covered* section of a schedule item.
- **Records being used for audits or legal actions.** Records being used for audits or legal actions must be kept until the audit is satisfied or the legal action ends, even if their minimum retention period has passed.
- **Original records that are microfilmed or scanned for storage on a digital imaging system before the minimum retention period has passed.** If an agency wishes to retain records on microfilm or as digital images in lieu of originals, the agency Records Management Officer must submit a separate Records Disposition Request to SARA before destroying original records. SARA staff will advise agencies on the feasibility and cost-effectiveness of microfilming and digital imaging.
- **Records that are subject to specific Federal retention requirements longer than the retention periods authorized in this schedule.** Agencies must make certain that the retention periods in this schedule are sufficient to meet applicable audit, reporting, or records retention requirements for any programs that are subject to Federal government audits or oversight. If longer retention periods are needed to meet Federal requirements, then agencies must submit separate records disposition requests for such records.

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INTERPRETING SCHEDULE ITEMS

SAMPLE ENTRY

90303 Building Admittance and Visitor Logs -- Logs of entry to and exit from agency facilities containing visitor name, organization or business, address, reason for visit or person/unit visited, and dates and times of entry and exit.

Minimum Retention and Disposition: Destroy 3 years after the end of the year to which they relate.

Justification: This retention period meets the statute of limitations involving personal injury litigation (Section 214 of the Civil Practice Law and Rules). It also meets or exceeds the statute of limitations for initiating criminal prosecutions for misdemeanors (Section 30.10 of the Criminal Procedure Law).

Records Not Covered: Records maintained by facilities that require extraordinary security

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(e.g., State Police barracks, correctional facilities, and secured mental health facilities) and records maintained by the Office of General Services in its capacity as a service agency for building security.

Note: Before disposing of these records, agencies must ensure that no legal actions have been initiated which might require access to them. If a case-by-case review of files is impractical, the Office of the Attorney General advises retaining the records an additional 3 months beyond the minimum retention period.

For each records series, the schedule entry provides the following information:

- **A Records Disposition Authorization (RDA) Number** for each authorized retention period. This is a control number assigned by SARA to indicate that the retention period has been authorized and to control the retention and final disposition of records stored in the State Records Center.
- **Title and Description:** A title that describes the contents, types of materials, and/or function of the records series and a brief description of the common uses for the records.
- **Retention and Disposition:** Retention is the **minimum** amount of time that records must be retained by the agency and the final action that can be taken after the minimum retention period has passed. Disposition is the method of disposal authorized for the records.
- **Justification:** A brief explanation of the reasons for the retention period and the final disposition.
- **Records Not Covered:** An indication of records that are not covered by a schedule entry.
- **Note:** Some items will include explanatory notes.

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SUGGESTIONS FOR EFFECTIVE USE OF THIS SCHEDULE

Good records management involves controlling records from the point of creation to final disposition through their destruction or transfer to the State Archives. This schedule and the following suggestions will help both agency Records Management Officers and program staff control the creation, distribution, storage, and disposition of administrative records.

Create and Maintain Adequate Recorded Documentation of Administrative Policies, Procedures, Transactions, and Controls

Agencies should use this schedule to organize both manual and automated files, establish or refine recordkeeping systems, and design information flows that are consistent with

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records management principles and which will help agencies create and maintain adequate documentation as required by the New York State Government Accountability, Audit, and Internal Control Act and any other legal and fiscal recordkeeping requirements. Documentation of administrative activities must be complete, purposeful, and useful to managers for controlling administrative operations and to auditors or others involved in analyzing operations. This schedule may serve as a guide in designing manual files and automated access and retrieval systems, and in planning for records equipment, supplies, and storage needs. During the initial design of records and information systems, agency staff should give due attention to future needs for retrieval, security, disposition, and preservation of the records.

Relate Administrative Records to Specific Schedule Entries

This schedule covers all copies of records whether maintained in central, regional, or facility administrative offices, or by program units. The records series descriptions in the schedule are intended to encompass the variety of ways in which agencies maintain their records. Therefore, the titles and descriptions of records series may not reflect the exact titles or filing arrangements used by each agency. Agencies have considerable flexibility in applying the schedule to their specific needs, as long as records are kept at least as long as the minimum retention set forth in this schedule. Agencies should review the title, description of the records series, and justification to help determine whether an item applies to a particular series of records. If you are not certain whether the schedule applies to a specific group of records or if you need assistance with records not covered by this schedule, please contact your agency Records Management Officer or SARA staff for advice and assistance.

Identify the Appropriate Retention Periods for Multiple Copies

Many records are produced in multiple copies, as a result of photocopying, multi-copy forms, or multiple electronic documents or data files. Sometimes records exist in multiple media or formats. All schedule entries provide a retention period for copies of records retained by the program office responsible for a specific function. These are commonly referred to as the "record copies" of the records. Some entries also provide another, usually shorter, period for other copies ("non-record copies") retained in other offices. In such cases, each program unit must determine which retention period is applicable prior to disposing of records. The agency Records Management Officer should work with administrative and program units to make these determinations, including identifying offices responsible for maintaining the "record copies" of documents. The Records Management Officer should consult with SARA if there are unresolved questions.

Use of This Schedule for Subject and Correspondence Files in Program Units

Program units often interfile their copies of administrative records in general subject and correspondence files. The general categories used to organize this schedule may serve as a useful guide for organizing subject and correspondence files in program units. In some cases, program staff may find it possible to weed these files on a regular basis using the schedule as a guide to identify obsolete records that may be discarded. However, because weeding is labor intensive and time consuming, it usually is not an effective way to remove obsolete records from large subject and correspondence files. Program units can employ file cutoffs in which all records created during a specific period of time (e.g., one fiscal or calendar year) are kept for the longest retention period required for any of the interfiled records, and then dispose of the obsolete records together as a unit. Agencies should consider redesigning filing systems if regular disposition of obsolete records is problematic.

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Use of This Schedule for Records of Electronic Data Processing Units and for Electronic Records in Program Units

This general schedule applies to all records regardless of format or media, including computer-generated electronic records. The Electronic Data Processing section of the schedule provides agencies with uniform guidelines for the retention and disposition of common EDP unit records in both hard copy and electronic form. The section covers records for which EDP units are responsible, including administrative records and those used to process data and monitor and control operations.

Data processing units are often the physical custodian of records, most often computer-readable electronic records, used to support program operations. These types of records must be retained to meet retention requirements specified by the program area. This EDP section does not cover electronic records that support program functions and activities. Program managers and staff are responsible for developing and applying retention schedules to those electronic records retained to meet program-specific requirements. Electronic records not included in this schedule must be scheduled separately by the program unit having the responsibility and authority to determine their retention requirements and final disposition.

Use of this schedule will ensure that EDP unit records are retained long enough for administrative needs, to meet legal and audit requirements, and to support management and control of automated systems that create and maintain electronic records. The guidelines have been developed to conform to generally accepted data processing practices. The schedule can also be used to help agencies define records that are the responsibility of EDP units and those that should be the responsibility of other program units.

Dispose of Records on a Regular Basis

Once adopted, an agency may use this schedule to dispose of obsolete records on a continuing basis after their minimum retention periods have been met. Disposition should be carried out periodically (generally once a year or at least once every two years). To facilitate orderly disposition of paper records, agency staff should review filing arrangements, cut off files periodically, and develop procedures to segregate inactive and obsolete files. Agencies should also develop and implement procedures for effective purging of electronic records from automated information systems on a regular basis. Disposition of electronic records can include down-loading them to off-line storage media such as magnetic tapes or diskettes, and eventual deletion or erasure. If files have not been purged for several years, this schedule may identify a significant volume of obsolete records that can be destroyed immediately.

Agencies should determine that no legal actions have been initiated which might require access to records before disposing of them. This is particularly important for records having a retention period based upon a legal statute of limitation because of the possibility that legal actions may have begun during the last days or weeks of the limitation period. If a case-by-case review of files prior to disposition is impractical, the Office of the Attorney General advises that the records be retained an additional three months beyond the minimum retention period. The "Justification" portions of authorizations in this schedule clearly indicate when the minimum retention periods for records are based upon a statute of limitation.

Disposition includes transfer of records to Records Center storage, when appropriate, and destruction of records through the State's wastepaper recycling contract, which SARA

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administers. SARA administers a revenue contract for the removal, secure destruction, and recycling of obsolete records from State-owned and leased facilities in the Albany area. All agencies are required to use this service, which provides for the confidential destruction of record material. The agency Records Management Officer should arrange for removal of records in accordance with the wastepaper contract by contacting SARA's Records Center Services at (518) 457-3171.

Retention of Records Longer Than the Authorized Minimum Period

Generally, records should be destroyed when the minimum retention period has been met, unless the records are being used in an audit or legal action, or if the agency requires them for continued reference or other administrative purposes. Obsolete records consume expensive office space and computer storage capacity, and they can hinder efficient access and retrieval of current records. Implementation of the schedule will allow agencies to destroy inactive records when they become obsolete in a timely and efficient manner.

Specific or temporary situations in an agency may create the need for retention periods that exceed the minimum retention periods in this schedule. Examples of situations that may require longer retention periods include stringent internal audit requirements, use of records to conduct research or monitor long-term trends, or the need to use records for ongoing investigations. Agencies are not required to destroy records at the end of the retention period, and they are not required to inform SARA if they intend to keep records longer. However, if agencies intend to retain records longer than the minimum retention periods as a regular business practice, they should document this intent in written internal procedures. This will provide documentation of normal practice for Freedom of Information Law requests, for legal actions such as discovery motions, or to justify continued storage of records in the State Records Center. Agencies may submit separate Records Disposition Requests (RDRs) for those series that they wish to retain longer than the retention periods in this schedule, but they are not required to do so.

Identify and Protect Vital Records

Agencies should identify "vital records" through risk assessment and provide for their security and protection. Vital records are those records that are essential to the operation of the agency and that would be required to resume and continue government operations after a disaster, to recreate legal and financial status of the organization, or to fulfill obligations to the public and employees. Examples of vital administrative records might include policies and procedures for particularly significant agency activities, data documentation for critical electronic information systems, and unique records documenting crucial physical plant structures and operating systems. Protection of vital records generally requires creation of duplicate copies, usually by microfilming or by creating backup computer tapes, which are stored in the State Records Center or other secure off-site location.

Archival Records

Archival records are those records designated by SARA for continuous preservation because they have enduring administrative, legal, fiscal, educational, historical, or other values. Seven series of records covered by this schedule are designated as entirely or partially archival:

- 90109 Agency Copy of Agency Budget Request

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- 90202 Reports of Major Administrative Studies
- 90203 Major Administrative and Operational Plans
- 90208 Major Administrative Policies and Procedures
- 90336 Press Release Files
- 90338 Agency Annual Reports
- 90359 Labor-Management Process Records.

One copy of Agency Copy of Agency Budget Request (90109), Reports of Major Administrative Studies (90202), Major Administrative and Operational Plans (90203), and Major Administrative Policies and Procedures (90208), and supporting documentation should be retained in executive level files, which will be evaluated by SARA staff for transfer to the State Archives. Press Release Files (90336), Agency Annual Reports (90338), and Labor-Management Process Records (90359) have been consistently appraised as archival by SARA. These records should be transferred periodically to the State Archives. In addition, Personal History Files (90001) of employees who left State service prior to 1945 may be archival. Please contact the State Archives and Records Administration regarding disposition of these records. The final disposition for all other records covered by this schedule is, *destroy*.

Store Inactive Records Off-Site

The State Records Center, operated by SARA, provides safe, low-cost storage and reference and retrieval services for inactive records. Inactive records that are not needed on a regular basis to conduct current business may be stored more cost effectively at the State Records Center's facilities. Agencies that need to retain records in the Records Center longer than the minimum retention periods on this schedule may do so, if a written justification for the longer retention is provided. Agency program staff should contact their Records Management Officer to apply to transfer records to the Records Center. Additional information about Records Center services and facilities is available from SARA's Records Center Services, Building 21, State Office Campus, Albany, NY (518) 457-3171.

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SOURCES OF ADDITIONAL INFORMATION AND ASSISTANCE

Each agency has a designated **Records Management Officer**, who coordinates the agency's records management program and serves as the primary contact for agency staff seeking information on adoption and use of general schedules. The Records Management Officer is responsible for agencywide records management planning, program development, training, and technical assistance, including records inventorying and scheduling. Agency staff should contact their Records Management Officer for advice on use of this schedule. Most agencies also have an **Internal Controls Officer** who may be able to review the adequacy of policies and procedures for documenting administrative operations. The agency **Public Records Access Officer**, who is responsible for implementing agency programs to comply with the Freedom of Information and Personal Privacy Protection Laws,

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can provide advice on public access questions.

SARA staff, working in conjunction with the agency Records Management Officer, assist agencies with developing or improving records access, storage and retrieval systems, assessing the feasibility of microfilming or imaging records, managing electronic records, and implementing retention and disposition schedules. SARA also provides courses for State agency personnel on a variety of records management topics. SARA staff can assist you in learning about these and other services and in coordinating their delivery to your agency.

For additional assistance, contact your agency Records Management Officer, or call or write SARA, 9B74 Cultural Education Center, Albany, New York 12230, telephone (518) 474 - 6771.

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For additional assistance
E-mail Records Management
Services or contact your Regional
Advisory Officer or call the State
Archives at (518) 474-6926

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READING FIRST LEA PROPOSAL REVIEW
MARCH 2006

REVIEW TEAM PROCESS AND RESPONSIBILITIES

PROCESS

- SED assigns a list of proposals to each Team for review and scoring. Each Team is assigned an equal share of large and small district proposals. Copies of the proposals are distributed to Team members by SED personnel at the Orientation Meeting on March 27, 2006.
- All three members of each Team independently read each proposal for evaluation against the Reading First Proposal Review Rubric. Teams are provided with blank copies of "Reviewer Notes / Worksheets" for the purpose of recording notes during the reading of the proposal. Individual reviewers are not required to complete the worksheets.
- After independently reading the proposal, Review Team members meet as a group to complete the Review Team Consensus Rating Sheet. The Team is required to arrive at a consensus score rating in the Meets Standard and Exemplary categories for each section of the rubric. The Team must also include comments that provide additional information or justification about scoring on the Consensus Rating Sheet. These comments may be brief, but should provide some rationale for the rating.
- When the Consensus Rating is complete, individual Review Team members initial the Review Team Consensus Rating Sheet for each LEA proposal that is reviewed.
- All materials are returned to SED personnel at the end of the proposal review work.

TEAM RESPONSIBILITIES:

Each Team is composed of a Team Leader and two Team Members.

Team Leader Responsibilities

1. To coordinate the review process for the Team, including scheduling of times for group Team meetings and monitoring the pacing of the reviews throughout the week.
2. To lead the Team in reaching consensus on score ratings.
3. To complete the Review Team Consensus Rating Sheet for each proposal reviewed.

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4. To collect the Reviewer Notes / Worksheet documents from all members of the Review Team.

Team Member Responsibilities

1. To prepare for Team scoring discussions by reading each proposal carefully and completely and using Reviewer Notes / Worksheets to record notes.
2. To initial completed Review Team Consensus Rating Sheets for each proposal reviewed.
3. To return all proposal copies, notes or other materials to Team Leader or SED personnel.

RF 05-06.Cohort C: March Review:Review Team Roles and Responsibilities.

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(i) Competitive Priorities

Federal Reading First criteria require that priority for funding will be given to school districts and charter schools in which at least 15 percent of the students served, or 6,500 children in the district, are from families with incomes below the poverty line. In addition, applicants will be awarded priority points based on the following State-identified indicators. A district may earn a maximum of seven priority points. These points will be added to the district's consensus score.

| INDICATOR | Pts | INDICATOR | Pts |
|--|-----|---|-----|
| At least 15% of the students served by the district are from families with incomes below the poverty line OR At least 6500 children in the district are from families below the poverty line | 1 | District demonstrates evidence of successful implementation of scientifically based reading instruction in K-3 through improved assessment results using valid and reliable measures of reading achievement | 2 |
| District is assigned NYS Need/Resource Capacity Category Code 1, 2, 3, or 4 | 1 | District demonstrates commitment to leverage existing or additional resources to support Reading First (e.g. clear coordination with Title I or school improvement plan) | 1 |
| District has selected schools with 40% or more students at Levels 1 and 2 on 2005 Elementary ELA assessment to be included in Reading First program | 1 | District has been awarded an Early Reading First grant | 1 |

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Each section of the LEA proposal will be rated using the criteria outlined in the Reading First Proposal Review Rubric (see Appendix K) to evaluate which applications are most likely to succeed. Reviewers will identify the required criteria in the narrative sections, not solely on the basis of LEA inclusion of key items, but also on sufficient details and explanations. Reviewers will evaluate the methods LEAs used to design effective Reading First programs, with particular review of selection of instruction programs, strategies, and materials, and plans for assessment, professional development, instructional leadership, instructional intervention, and program evaluation.

Each application will be read individually and scored by each review panel member. The reviewers will meet to achieve a consensus rating through discussion. The reviewers will use the rubric to determine the number of points to give each criterion. A total of 100 points may be awarded.

To be considered for funding a LEA proposal must:

- Receive a final score of 75 points or greater, including bonus points.
- Be rated "Meets Standards" or "Exemplary" for all criteria. If a proposal is rated "Does Not Meet Standards" for one or more criteria, it cannot be considered for funding.
- Demonstrate commitment to implementing the Reading First program in accordance with federal and State guidelines by providing a Statement of Assurances signed by the Superintendent and principals of each school participating in the program.

All LEAs receiving a final consensus score of at least 75 points will be ranked from highest to lowest. Awards will be made in the full amount of the adjusted budget in rank order of score until funds allocated are insufficient to fund the next ranking district in full.

Consistent with federal Reading First criteria, New York State will give funding priority to those LEAs with at least 15 percent of the students from families with incomes below the poverty line, or those LEAs that have at least 6,500 students from families below the poverty line. In addition, applicants will be awarded priority points based on the following State-identified need and capacity indicators. A district may earn a maximum of seven (7) priority points. These points will be added to the LEAs consensus score.

| NEED INDICATORS | Pts. | CAPACITY INDICATORS | Pts. |
|--|------|---|------|
| At least 15% of the students served by the district are from families with incomes below the poverty line OR At least 6500 children in the district are from families below the poverty line | 2 | Has a district-wide, fully implemented reading program based on scientifically-based reading research | 1 |

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READING FIRST
LEA PROPOSAL REVIEW SUMMARY SHEET

LEA NAME: ILION

REVIEW TEAM: 4

RECOMMENDED SCORE: 70

| Proposal Category | Does Not Meet Standard | Meets Standard Recommended Score | Exemplary Recommended Score |
|---|------------------------|----------------------------------|-----------------------------|
| (i) Schools to be Served | | 8 | 1 |
| (ii) Instructional Assessments | | 4 | 0 |
| (iii) Instructional Strategies and Programs | | 7 | 1 |
| (iv) Instructional Materials | | 7 | 2 |
| (v) Instructional Leadership | | 8 | 0 |
| (vi) District and School-based Professional Development | | 8 | 0 |
| (vii) District-based Technical Assistance | | 7 | 1 |
| (viii) Evaluation Strategies | | 6 | 0 |
| (ix) Access to Print Materials | | 4 | 1 |
| (xii) Budget Narrative | | 4 | 1 |
| TOTAL | | 63 | 7 |

COMMENTS: The review team felt that some essential components were missing in this grant. First, the assessment plan does not clearly delineate a diagnostic tool to be used in the State mandated assessments nor does the focus of the assessment and instructional plan utilize the State mandated assessments as an integral part of the proposed program. Second, in the alignment of Open Court with Reading First 3 of the main components were missing. In the evaluation section there was no plan to document the effectiveness of the proposed program at the LEA or building level, nor is the plan for schools needing intervention very explicit. Lastly, of many concern is the budget, specifically of reading teachers, summer school programs or extended day are allowable budget items. Of concern as well:

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- 1) The description of the QRI-3 & DRA – There is no alignment with Reading First.
- 2) No clear description of how supplemental and intervention programs will be used in the classroom.

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ATTACHMENT K



2005-2006 LEA Proposal Review Summary Sheet

LEA NAME: Madison

REVIEW TEAM: 2

RECOMMENDED SCORE: 72

| Proposal Category | Does Not Meet Standard | Meets Standard Recommended Score | Exemplary Recommended Score |
|---|------------------------|----------------------------------|-----------------------------|
| (i) Schools to be served | | 5 | 1 |
| (ii) Instructional Assessments | | 8 | 2 |
| (iii) Instructional Strategies and Programs | | 10 | 1 |
| (iv) Instructional Materials | | 6 | 1 |
| (v) Instructional Leadership | | 8 | 1 |
| (vi) District and School-based Professional Development | | 6 | 1 |
| (vii) District-based Technical Assistance | | 6 | 1 |
| (viii) Evaluation Strategies | | 7 | 1 |
| (ix) Access to Print Materials | | 2 | 1 |
| (x) Budget Narrative | | 4 | 0 |
| TOTAL = 72 | | 62 | 10 |

COMMENTS: The application does not meet standard. Upon review of the application there were several areas, which lacked sufficient detail to substantiate the applicant's compliance with the requirements. Key areas missing details included required documentation on school demographics, which relied heavily on outdated statistics to substantiate student and population need. Other required areas needing detail included the description of the gaps identified in McGraw-Hill Materials, which were identified but not explained, and the Professional Development plan, which had numerous inconsistencies and conceptual difficulties. The Professional development plan did not cover the term of the grant, focused on the first few months and overlooked the extent of the work and learning load created by the need to attend the Reading First Academy which requires extensive time commitments both for attending to the on

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ATTACHMENT K

line training as well as practice in the classroom. Modules need to be taken and applied to classroom practice to be most effective. Trying to condense the training into the first few months of the program is in the view of the team an unmanageable approach and will result in major difficulties. In addition the review team found the Professional Development Plan to be lacking in clarity and consistency. Since this area is so critical to the success of the program, it is imperative that the training be sequentially consistent with the needs of staff and the students. The team strongly suggests that the applicant redo the schedule for the Academy to 1 year.

The applicant's approach to the printed materials focuses on the library for the building and is not approvable from the Reading First funding source. Library resources need to be classroom centered libraries and specific for ease of classroom use.

The application does not provide adequate documentation on the anticipated use of financial resources. All budget items must be specifically for the Reading First Effort. A number of proposed expenditures including equipment expenses, miscellaneous expenses and others seem excessive to the size of the school system and proposed plan. It is unclear how they would be used to support the Reading First Program. On the other end of the continuum the team was unable to locate documentation of a broad range of purchasing directly Reading First related resource materials etc. that seems to be an oversight.

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2005-2006 LEA Proposal Review Summary Sheet

LEA NAME: Fort Edward

REVIEW TEAM: 1

RECOMMENDED SCORE: 73

| Proposal Category | Does Not Meet Standard | Meets Standard Recommended Score | Exemplary Recommended Score |
|---|------------------------|----------------------------------|-----------------------------|
| (i) Schools to be served | | 7 | 1 |
| (ii) Instructional Assessments | | 6 | 1 |
| (iii) Instructional Strategies and Programs | | 8 | 1 |
| (iv) Instructional Materials | | 6 | 1 |
| (v) Instructional Leadership | | 7 | 0 |
| (vi) District and School-based Professional Development | | 7 | 0 |
| (vii) District-based Technical Assistance | | 6 | 1 |
| (viii) Evaluation Strategies | | 7 | 1 |
| (ix) Access to Print Materials | | 4 | 1 |
| (x) Budget Narrative | | 8 | 0 |
| TOTAL = 73 | | 66 | 7 |

✓ COMMENTS:

- i. None
- ii. Description of how assessment data will be used to make educational decisions at student, classroom and program levels. How assessments connect with instruction is not evident. Interaction between coordinator, coach and teacher is unclear.
- iii. Description of process for evaluating and selecting Reading First programs and materials was not evident. Description of instructional

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- applications of Reading First programs and strategies in Special Education was not evident.
- iv. Insufficient research is cited to show Lindamood Bell program as supported by SBRR.
 - v. None
 - vi. It appears that there is a heavy emphasis on Trophies for professional development. It was unclear what connections were made to NYS standards, and the professional development of the Reading Coach was not specifically stipulated.
 - vii. None
 - viii. None
 - ix. None
 - x. None
 - xi. No description of how Reading First will coordinate with other available funding streams is evident.

*The way in which this proposal was written made it difficult to review. There was a significant amount of extraneous information that masked important data. Lack of specifics in many cases hampered evaluation. It is also worth noting that the font and formatting were problematic. The presentation distorted the larger scope of Reading First goals, and made it difficult to evaluate overall plan cohesiveness.

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ATTACHMENT M

Reading First
Application Screening Checklist

District/Charter School Name _____ Reviewer's Name _____
Date Reviewed: _____ Number of Schools applied for _____
Application amount Year 1 \$ _____

Check all items that are included in the application. If any item is missing, STOP and return proposal to review coordinator.

- Completed cover page
- Statement of Assurances (original signature)
- Statement of Commitment (original signature)
- Certifications (original signature on all)
 - Certifications regarding lobbying; debarment, suspension and other responsibility matters; and drug-free requirements
 - Disclosure of Lobbying Activities
 - Certification regarding debarment, suspension, ineligibility and voluntary exclusion – Lower Tier Covered Transactions
 - Assurances – Non-Construction Programs
- Documentation of Teachers' Union Participation
- Documentation of Private School Consultation
- Project Abstract
- Project Description
 - Schools to be served
 - Instructional Assessment
 - Instructional Strategies and Programs
 - Instructional Materials
 - Instructional Leadership
 - Professional Development
 - Technical Assistance
 - Evaluation
 - Access to Print Materials
- Three Year Budget Narrative

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READING FIRST
Round Two Proposal Review
March 2006

REVIEWER TEAM CONSENSUS RATING SHEET

LEA NAME: _____

REVIEW TEAM NUMBER: _____

REVIEWER INITIALS

Team Leader _____

Team Member _____

Team Member _____

In order to "Meet Standard," the proposal must address listed items within each category. Reviewers will determine an aggregate number of points to be awarded for the category. The points awarded must be within the indicated maximum.

Proposals that do not address each listed item in the category must be rated "Does Not Meet Standard." Proposals that do not "Meet Standard" in each category cannot be awarded a Reading First subgrant.

(i) **Schools to be Served**

Meets Standard: 1-8 points

___ Names schools with highest percentage of children reading below grade level and highest percentage of children living in poverty

___ Describes criteria used to select schools, including poverty data, assessment results, student demographics

___ Clearly demonstrates district capacity to support implementation in the number of selected schools, including private schools

___ Demonstrates meaningful consultation w/private schools (not applicable if no private schools located in attendance zones of Reading First buildings)

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Exemplary: 1-2 points

- Describes rationale and criteria used to identify schools not selected for Reading First
- Describes additional detailed objective and relevant criteria used to select schools (class size; student/teacher-paraprofessional ratio, school size, school leadership and teacher expertise in SBRR, rate of teacher turnover, pupil and teacher attendance rates, existence of foundational literacy programs such as Even Start, Prekindergarten, full day Kindergarten, etc.)

COMMENTS:

RECOMMENDED SCORE

- Does Not Meet Standard**
- Meets Standard Points Recommended**
- Exemplary Points Recommended**

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(ii) **Instructional Assessments**

Meets Standard: 1-8 points

- ___ Identifies assessments to be used for screening, progress monitoring, diagnostic and outcome evaluation at each grade level (K,1,2,3,)
- ___ Provides documentation that selected assessment instruments are reliable and valid and appropriate for purpose, skill to be evaluated and grade level of application
- ___ Provides evidence that assessments are aligned with Reading First instructional program
- ___ Time line for administration of assessments is clear and appropriate
- ___ Identifies district protocol for the collection, analysis and application of data and provisions for intervention in response to results
- ___ Describes how assessment data will be used to make educational decisions at student, classroom, program levels
- ___ Identifies qualified person(s) who will have overall responsibility for Data System at school and district levels
- ___ Describes plan for management of reporting requirements (i.e. quarterly reports, annual reports)

COMMENTS:

Exemplary: 1-2 points

- ___ Provides detailed description of how assessment data will be used to make instructional decisions and plan interventions for students
- ___ Provides a detailed plan for appropriate instructional modifications and interventions as a result of progress monitoring assessments, including

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adjustments in programs, strategies and materials and more frequent monitoring
of student progress

___ Describes in-depth plan for more frequent progress monitoring for students who
are struggling

___ Describes plan for use of program-specific assessments

COMMENTS:

RECOMMENDED SCORE

___ **Does Not Meet Standard**

___ **Meets Standard Points Recommended**

___ **Exemplary Points Recommended**

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(iii) **Instructional Strategies and Programs**

Meets Standard: 1-8 points

- Describes procedures that will result in the LEA and schools:
 - (a) implementing instructional strategies based on SBRR;
 - (b) selecting and implementing scientifically based comprehensive reading programs that provide instruction to all K-3 students;
 - (c) using instructional strategies and programs that teach the five essential components of reading;
 - (d) using instructional strategies and programs that will enable students to reach the level of reading proficiency;
 - (e) implementing a clear and specific plan to use scientifically based instructional strategies to accelerate performance and monitor progress of students who are reading below grade level;
 - (f) selecting and implementing scientifically based comprehensive reading programs, without layering selected programs on top of non-research based programs already in use.

- Describes process for evaluating and selecting Reading First programs and materials

- Provides list of supplemental and intervention programs with rationale for selection based on SBRR

- Provides documentation that supplemental and intervention programs and strategies are grounded in SBRR and reviewed for evidence of effectiveness from evaluation studies with similar populations

- Describes instructional applications of programs and strategies, with emphasis on the characteristics of a Reading First classroom and use of materials in their intended manner

- Describes commitment to scheduling daily 90-minute blocks with significant additional time for instructional intervention and for schools that are not progressing

- Describes instructional applications of Reading First programs and strategies in Special Education (K-12)

- Describes plan for offering students explicit, systematic instruction in phonemic awareness (e.g., isolating and manipulating the sounds in words); phonics (e.g., blending sounds, using texts that allow students to practice their phonics knowledge); fluency (e.g., assisted, repeated oral reading); comprehension (e.g., summarizing text, graphic and semantic organizers, asking and answering

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questions, summarization); and vocabulary (e.g., repeated exposure to the meaning of words in varieties of contexts)

- Describes instructional strategies for intervention including more explicit strategies, coordinated instructional sequence, and increased practice and assessments

COMMENTS:

Exemplary: 1-2 points

- Describes a detailed plan for alignment of Reading First programs and strategies with NYS standards
- Demonstrates awareness of possible gaps in Reading First strategies and program and plans for augmentation

COMMENTS:

RECOMMENDED SCORE

- ___ **Does Not Meet Standard**
- ___ **Meets Standard Points Recommended**
- ___ **Exemplary Points Recommended**

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(iv) **Instructional Materials**

Meets Standard: 1-8 points

- ___ Provides list of instructional materials with rationale for selection based on SBRR
- ___ Describes process for evaluating and selecting Reading First instructional materials
- ___ Provides list of supplemental and intervention materials with rationale for selection based on SBRR
- ___ Provides documentation that supplemental and intervention materials are grounded in SBRR and reviewed for evidence of effectiveness from evaluation studies with similar populations
- ___ Describes instructional applications of materials with emphasis on the characteristics of a Reading First classroom and use of materials in their intended manner
- ___ Describes instructional applications of materials with special education students or other special populations
- ___ Ensures that preservice teachers will use instructional materials grounded in SBRR
- ___ Describes instructional materials used for interventions with struggling readers (more explicit strategies, increased practice opportunities)

COMMENTS:

Exemplary: 1-2 points

- ___ Describes a detailed plan for the use of instructional materials to teach the components of reading, include a explicit and systematic instructional strategies, have a coordinated instructional sequence, and are aligned with the comprehensive reading program
- ___ Describes a plan for aligning reading materials with NYS standards

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- ___ Identifies gaps in selected Reading First materials and plans for supplementation
- ___ Describes an in-depth plan for use of intervention materials to accelerate student performance for struggling readers

COMMENTS:

RECOMMENDED SCORE

- ___ **Does Not Meet Standard**
- ___ **Meets Standard Points Recommended**
- ___ **Exemplary Points Recommended**

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(v) **Instructional Leadership**

Meets Standard: 1-8 points

- ___ Describes plan for LEA and Building leadership responsibilities in implementation of Reading First
- ___ Describes title and responsibilities of LEA administrator/coordinator with responsibility for design, implementation and oversight of Reading First
- ___ Describes title and responsibilities of designated LEA administrator with responsibility for oversight of Student Data System
- ___ Describes responsibilities of Reading First Building Principal in implementation of Reading First
- ___ Describes qualifications, authority and responsibilities of Reading First Building Coach
- ___ Provides evidence of LEA support to Reading First schools, including sufficient authority, times, resources and expertise of instructional leaders
- ___ Provides names and titles of District and Building Design Team membership
- ___ Provides name and title of collective bargaining unit representative on LEA and school Design Teams
- ___ Describes responsibilities and activities of Reading First Design teams, with documentation of knowledge of SBRR and application in planning for Reading First
- ___ Describes LEA commitment to utilize services of RSSC and Regional Coaches
- ___ Describes LEA process for monitoring process in Reading First schools
- ___ Describes professional development planned for LEA and building leadership

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Exemplary: 1-2 points

- Demonstrates commitment to ensuring mandatory professional development for principals and building leaders in research-based reading instruction and the specific instructional programs and materials to be used in Reading First

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RECOMMENDED SCORE

_____ **Does Not Meet Standard**

_____ **Meets Standard Points Recommended**

_____ **Exemplary Points Recommended**

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(vi) **Professional Development**

Meets Standard: 1-8 points

- ___ Provides evidence of LEA oversight of the design, implementation and evaluation of Reading First professional development
- ___ Provides a professional development plan developed by Design Team and based on Reading First principles
- ___ Provides a professional development plan that offers a full range of professional development experiences that are intensive, focused and of sufficient duration to achieve the intended purposes and goals. Professional development plan provides adequate time for study, observation, practice, application and evaluation.
- ___ Describes plans for participation in New York State Reading Academy
- ___ Describes provision and plans for additional professional development for teachers who require it
- ___ Describes professional development participation requirements, including teacher professional development plans and participation of special education teachers
- ___ Describes process of identifying professional development providers who are highly qualified in SBRR
- ___ Describes plans for participation and coordination with RSSC professional development
- ___ Describes professional development for all Reading First LEA and building leadership
- ___ Describes professional development specific to Building Coaches
- ___ Describes professional development on Reading First linkage to NYS Standards and assessments

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Exemplary: 1-2 points

- ___ Provides a detailed plan for explicit needs assessment of teacher professional development and application of needs assessment results in professional development plans
- ___ Provides a detailed plan for coordination of LEA professional development with NYSED professional development activities for improving reading achievement

COMMENTS:

RECOMMENDED SCORE

- ___ **Does Not Meet Standard**
- ___ **Meets Standard Points Recommended**
- ___ **Exemplary Points Recommended**

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(vii) **Technical Assistance**

Meets Standard: 1-8 points

- ___ Describes LEA plan for providing high quality technical assistance relating to the implementation of Reading First in selected schools
- ___ Describes LEA plan for providing technical assistance to selected schools in evaluation of Reading First program
- ___ Provides assurance that LEA will provide technical assistance to facilitate student achievement
- ___ Describes how technical assistance will be provided by leadership with knowledge of SBRR
- ___ Describes how technical assistance will be coordinated with RSSC, Regional Coaches and Assessment Specialists
- ___ Describes LEA plan for provision of technical assistance in response to quarterly progress reports prepared with RSSC
- ___ Describes plans to provide LEA technical assistance related to implementation of the Student Data System

COMMENTS:

Exemplary: 1-2 points

- ___ Provides detailed description of how LEAs will provide high quality technical assistance to selected schools as related to setting goals and benchmarks

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RECOMMENDED SCORE

_____ **Does Not Meet Standard**

_____ **Meets Standard Points Recommended**

_____ **Exemplary Points Recommended**

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(viii) **Evaluation Strategies**

Meets Standard: 1-4 points

- ___ Describes LEA plan to document effectiveness of Reading First program, at LEA and building level
- ___ Describes LEA plan to report reading achievement data disaggregated by income, ethnicity, and special student needs such as LEP and SWD
- ___ Describes incorporation of Student Data System in evaluation plan
- ___ Describes LEA plan for intervention and/or discontinuation plans for Reading First schools that are not making progress in student reading achievement

COMMENTS:

Exemplary: 1 point

- ___ Specifies valid and reliable instruments selected by the LEA to document the effectiveness of the Reading First program in selected schools and in the LEA
- ___ Describes how the LEA will use valid and reliable data to report disaggregated achievement progress
- ___ Describes detailed plan for intervention for Reading First schools that are not making progress in student reading achievement

COMMENTS:

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RECOMMENDED SCORE

_____ **Does Not Meet Standard**

_____ **Meets Standard Points Recommended**

_____ **Exemplary Points Recommended**

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ATTACHMENT N

(ix) **Access to Print Materials**

Meets Standard: 1-4 points

- Describes process of assessment of need for print materials and an environment conducive to reading
- Describes how LEA will promote reading and library programs that provide student access to engaging reading materials, including coordination with other programs
- Describes how LEA will ensure that selected schools have reading libraries with adequate materials based on SBRR

COMMENTS:

Exemplary: 1 point

- Describes how LEA will promote reading and library programs that provide student access to a wide array of engaging reading materials
- Describes how LEA will provide high quality reading instruction software that will be aligned with SBRR and Reading First

COMMENTS:

RECOMMENDED SCORE

- Does Not Meet Standard**
- Meets Standard Points Recommended**
- Exemplary Points Recommended**

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(x) **Budget Narrative**

Meets Standard: 2-16 points

- ___ Provides a detailed narrative of proposed expenditures aligned with planned project activities
- ___ Demonstrates that the proposed allocation of resources is sufficient to successfully implement the Reading First program
- ___ Includes a detailed budget justification that clearly demonstrates the feasibility of the LEA Reading First plan

COMMENTS:

Exemplary: 1-4 points

- ___ Describes how the LEA will coordinate Reading First with other available funding streams

COMMENTS:

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RECOMMENDED SCORE

_____ **Does Not Meet Standard**

_____ **Meets Standard Points Recommended**

_____ **Exemplary Points Recommended**

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ATTACHMENT O

NEW YORK CITY READING FIRST PROGRAM

Reading First Award Date: 3/1/2004

DISTRICT DEMOGRAPHIC INFORMATION

| | |
|--|---|
| Number K-3 Students Served in New York City Reading First Schools | 27,107 |
| New York City Reading First Schools | 49 Public Schools 35 Private Schools |
| Percentage of Students Eligible for Free and Reduced Lunch (2002-2003) | 83% |
| Students Performing Below Proficiency Level on G4 State ELA (2001) | 56% |
| Percentage of Total New York State English Language Learners in New York City Schools | 80% (Chap. 655 Report, July 04, Vol. II, p. 1) |
| Percentage of Total New York State Students with Disabilities in New York City Schools | 36% (Chap. 655 Report, July 04, Vol. I, p.7) |

DISTRICT ASSESSMENT INFORMATION

* Data reflects outcomes after one full year of Reading First implementation.

Reading Comprehension

Percentages of NYC Reading First Students at Grade-Level Benchmark (Terra Nova)

| | Percent at Comprehension Benchmark 2003-2004 | Percent at Comprehension Benchmark 2004-2005 |
|---------|---|---|
| Grade 1 | 3.1% | 26.5% |
| Grade 2 | 4.1% | 17.1% |
| Grade 3 | 3.9% | 16.6% |

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Percentages of NYC Reading First Students at Grade-Level Benchmark (DIBELS ORF)

| | Percent at Fluency Benchmark 2003-2004 | Percent at Fluency Benchmark 2004-2005 |
|---------|---|---|
| Grade 1 | 26.0% | 48.3% |
| Grade 2 | 18.7% | 37.1% |
| Grade 3 | 16.3% | 31.3% |

Data provided by New York City Department of Education:

| | |
|--|-------------|
| Increase in Reading First Grade 3 students at proficient and advanced levels on the 2005 NYC Grade 3 ELA test (over 2004) | 8.5% |
| Increase all NYC Grade 3 students (including Reading First) at proficient and advanced levels on the 2005 NYC Grade 3 ELA test (over 2004) | 7.8% |

DISTRICT IMPLEMENTATION INFORMATION

All New York City Reading First schools:

- Use Harcourt Trophies as the core reading program.
- Teach reading in an uninterrupted 90 minute (or longer) instructional block in grades K-3.
- Have a qualified Building Coach to assist teachers in making instructional strategies more effective.
- Administer valid and reliable screening, progress monitoring and outcome assessments in compliance with the NYS Reading First Assessment Framework.
- Have had teachers, principals, coaches and regional coordinators participate in extensive and expert professional development on scientifically based reading instruction.
- Have received ongoing technical assistance through the New York City Regional School Support Center and monitoring by SED staff.