

OVERVIEW

Audit of the Department of Education's Comprehensive Student Support System

Report No. 02-12, September 2002

Summary

In 1994, the Department of Education embarked upon a systemic reform initiative, the Comprehensive Student Support System (CSSS), to ensure all students receive the necessary supports to achieve high academic standards. CSSS attempts to address the social, emotional and physical needs of students through an array of support services that range from basic classroom instruction to intensive specialized programs. CSSS includes all functions and operational costs of the department, and classifies them into three component areas: instruction, management, and support. During FY2000-01, the department spent approximately \$1.3 billion to operate the public education system – the comprehensive student support system by the department's definition.

Our review of the design and implementation of CSSS found the department hastily expanded the CSSS reform initiative to take advantage of the funding opportunity available through the *Felix* consent decree. Realizing that additional funding for student support could be obtained through the decree, the department convinced the court monitor that CSSS would provide the system of care required by the decree. At the time, CSSS was still in its pilot test phase at a handful of schools. When the court ordered the department to issue a plan for implementing CSSS, the department informed the Legislature that denial of funding would result in a contempt order against the State. In FY2000-01 the department allocated 420 CSSS positions at an approximate cost of \$13 million after receiving most of the funding and positions it requested from the Legislature.

The Department of Education's rushed expansion of CSSS resulted in a multi-million dollar system that lacks accountability and effectiveness measures, and experiences difficulty in implementation. For example, the failure to clearly define "support services" and the Student Support Services Branch's authority has resulted in fragmented services and unclear costs. Moreover, the department failed to establish meaningful performance measures to assess CSSS' effectiveness. Difficulties with the department's Integrated Special Education System (ISPED) and CSSS databases have resulted in incomplete data being used to assess the effectiveness of CSSS.

Our review of the CSSS operation manual and a survey of school staff found that adequate direction, space, and equipment were not provided to schools to implement CSSS. School principals had to improvise to accommodate the 273 student services coordinators and 252 educational assistants and other support staff suddenly assigned to their schools. As a result, CSSS staff are sometimes housed in libraries, hallways, and closets.

We found the department created these additional CSSS positions without clearly delineating their responsibilities and without ensuring that staff are qualified to

fulfill their duties. The department spent over \$12 million during FY2000-01 for student services coordinators and CSSS educational assistants without clearly defining their roles. Among the consequences: principals used these coordinators for functions other than those related to coordinating support services. Principals used educational assistants primarily as clerical staff although the assistants were paid to give students direct classroom services. Each school district was allowed to establish its own position descriptions for staff responsible for the School-Based Behavioral Health Program, which serves students with behavioral health issues. This resulted in staff holding various positions but performing similar duties. School staff report that not all school-based support staff are qualified for their duties. For example, social workers transferred from the district offices reported they lack the training to do long-term counseling and/or therapy, one of the requirements for school-based support staff.

Recommendations and Response

We recommended the department reexamine the Student Support Services Branch to ensure it can effectively and efficiently oversee the implementation of the all-encompassing CSSS. We also recommended that all program costs for support services and special education be made readily transparent to both the public and decision makers. We also recommended that the department take steps to improve staff's understanding and support of CSSS, improve its ability to effectively assess CSSS, and ensure that all newly created positions are necessary and filled by qualified staff.

The department acknowledges that it rushed the implementation of CSSS and reports that our recommendations are both "reasonable and doable." The department addressed most audit recommendations with examples of what it is doing to implement them. However, the department needs to provide clarification on how it intends to inform the public and decision makers about the costs of support services. Furthermore, when assessing its organizational structure, the department will need to ensure that the authority of organizational units aligns with their responsibilities.

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