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

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A Report to the  
Governor  
and the  
Legislature of  
the State of  
Hawaii

Report No. 02-12  
September 2002



**THE AUDITOR**  
STATE OF HAWAII

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## Office of the Auditor

The missions of the Office of the Auditor are assigned by the Hawaii State Constitution (Article VII, Section 10). The primary mission is to conduct post audits of the transactions, accounts, programs, and performance of public agencies. A supplemental mission is to conduct such other investigations and prepare such additional reports as may be directed by the Legislature.

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2. *Management audits*, which are also referred to as *performance audits*, examine the effectiveness of programs or the efficiency of agencies or both. These audits are also called *program audits*, when they focus on whether programs are attaining the objectives and results expected of them, and *operations audits*, when they examine how well agencies are organized and managed and how efficiently they acquire and utilize resources.
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# OVERVIEW

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

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### **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.

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## 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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Submitted by

**THE AUDITOR**  
STATE OF HAWAII

Report No. 02-12  
September 2002

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## Foreword

This audit of the Department of Education's Comprehensive Student Support System (CSSS) was conducted pursuant to House Concurrent Resolution No. 91 of the 2001 regular legislative session. Our audit focused on CSSS' system design, implementation, and staffing.

We wish to express our appreciation for the cooperation and assistance extended to us by the officials and staff of the Department of Education.

Marion M. Higa  
State Auditor

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# Chapter 1

## Introduction

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In 1994, the Department of Education embarked upon a systemic reform initiative, promising to develop coordinated student support services that would ensure all students achieve high academic standards. This approach, known as the Comprehensive Student Support System (CSSS), was initially piloted at the McKinley Complex during school year 1996-97. The pilot program was expanded to an additional six complexes during school year 1997-98 and then to all 252 public schools during school year 2000-01.

During FY2000-01, the department expended approximately \$1.3 billion to operate the public education system. CSSS includes all the functions and operational costs of the entire department, and classifies them into three component areas: instruction, management, and support.

The Legislature in its 2001 Regular Session, through House Concurrent Resolution No. 91, requested the State Auditor to conduct a management and financial audit of the Department of Education's CSSS to ensure that CSSS functions efficiently, properly, and serves the greatest number of students.

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## Background

The mission of CSSS is to provide all students with a support system so they can be productive and responsible citizens. By implementing CSSS to address students' social, emotional, and physical needs, the department hopes to raise the performance of all students. CSSS attempts to achieve this by providing students with an integrated support system and improving student access to a full array of support services. The department's staff work toward these efforts by ensuring quality instruction, engaging family and community involvement, and coordinating student support services.

***The Comprehensive Student Support System (CSSS) is a school reform initiative intended to address barriers to student learning***

The belief that an education system must provide students with supports to ensure their success is not new. It is the impetus for many school programs that address students' social, behavioral, and physical needs. In recent years, increased awareness of this concept has resulted in various reform initiatives promoting the early identification of barriers that impede student learning and the provision of support services to address these obstacles.



### **CSSS evolved from Success Compact**

In 1994, the then superintendent of education committed the department to assuring literacy for all public school students. His initiative, called Success Compact, was based on the premise that all students must first master basic communication skills (reading, writing, relating, speaking, and thinking) before they can meet education and performance standards. In assuring his commitment to student literacy, the superintendent promised that “any change we make, innovation we introduce, refinement we advance, idea we entertain, direction we follow, or plan we promote, must demonstrate *its focus on instruction and how it contributes toward student literacy.*”

This superintendent pledged that the department would support “every student, every time” and that existing services would be realigned and redefined into a Comprehensive Student Support System (CSSS). The department’s 1997 *Literacy System Guide* defines CSSS as “a coordinated array of instructional programs and services designed to provide support to students throughout their educational career.”

### **CSSS incorporates Adelman and Taylor’s school reform model**

Currently, CSSS incorporates the essential design elements of the school reform model adopted by Howard Adelman and Linda Taylor, co-directors of the UCLA Center for Mental Health in Schools. The center is one of two nationally that receive federal funding to address learning barriers. Adelman and Taylor contend that schools must first address barriers to student learning if they are to enable effective teaching. The co-directors believe educational reforms that focus solely on raising academic standards are inadequate. Instead, they encourage schools to move away from a two-component educational model that promotes effective instruction and well-managed schools, and instead adopt a three-component model that includes the infrastructure necessary for student support.

CSSS incorporates the three essential elements of Adelman and Taylor’s school reform model. First CSSS’ instructional component focuses on attaining of literacy and educational standards by promoting instructional methods that recognize students’ diversity. Second, the management component organizes the instructional and student support components through planning, budgeting, staffing, directing, coordinating, monitoring, evaluating, and reporting. Third, the student support component addresses barriers to student learning through an array of student support services. These services include programs that already existed in schools such as the Gifted and Talented Program, English for Second Language Learners, the Comprehensive School Alienation Program, and special education.

### **CSSS goals are consistent with national educational reform efforts**

CSSS goals are consistent with national educational reform initiatives. Recent federal laws encourage states to ensure the academic success of *all* students. In 1994, Congress established national education goals in the Goals 2000: Educate America Act. This act provides states with a national framework for educational reform. The national goals include promoting the performance of all students and encouraging partnerships between schools and parents in decision-making and in supporting students' academic work.

Similarly, the Improving America's Schools Act of 1994 recognizes that all children can master challenging content and complex problem solving skills. The act also acknowledges that conditions outside the classroom—including hunger and homelessness—can adversely affect children's academic achievement and must be addressed through coordinated services.

CSSS reinforces these federal goals by advocating parental involvement and the development of a support system within and beyond the regular classroom.

### **CSSS provides five levels of student support and formalizes procedures for requesting support services**

CSSS provides all public school students with support services; however, the level of support varies by individual need. The department has categorized services into five levels of support ranging from basic classroom instruction to intensive specialized programs.

Level one services include the basic support services all students receive, such as classroom instruction, parent/family conferences, middle school teams, and career pathways. The classroom teacher is key in providing services at this level and is expected to communicate with the students and their families, and to adjust classroom instructional strategies as necessary.

Level two services provide students with additional support through the classroom teacher's collaboration with other school personnel including counselors and administrators. These supports include counseling, health aide services, and traditional supports.

Level three services provide further assistance for specific needs or groups of students. Services include individual, school, and community based programs that are outside the regular classroom, such as alternative learning centers, the Comprehensive School Alienation Program, and the Gifted and Talented Program.

Students requiring specialized assessment(s) or assistance from the department receive level four services. These services include Section 504 accommodations, special education, mental health, and physical and occupational therapy.

Level five services are the most intensive and include multiple agency supports. Students receiving level five services may be served at off-campus therapeutic and/or educational programs.

Each school develops a Request for Assistance Form for those students whose needs exceed what the classroom teacher can provide. Schools designate a point of entry person who organizes core committees to review each request. The committee may intervene with basic supports, informal additional supports or individualized school or community programs. If the student requires services at a higher level, a student support team convenes to review the request. Exhibit 1.1 identifies the referral process.

### ***CSSS addresses the Felix consent decree***

In 1993, a lawsuit was filed against the State in U.S. District Court alleging that qualified handicapped children were not receiving necessary educational and mental health services and that the State violated the Individuals with Disabilities Education Act (IDEA) and Section 504 of the Rehabilitation Act of 1973. In May 1994, the court concluded that the State had violated these federal laws. The result was the *Felix* consent decree, under which the State agreed to fully implement a system of care by June 30, 2000.

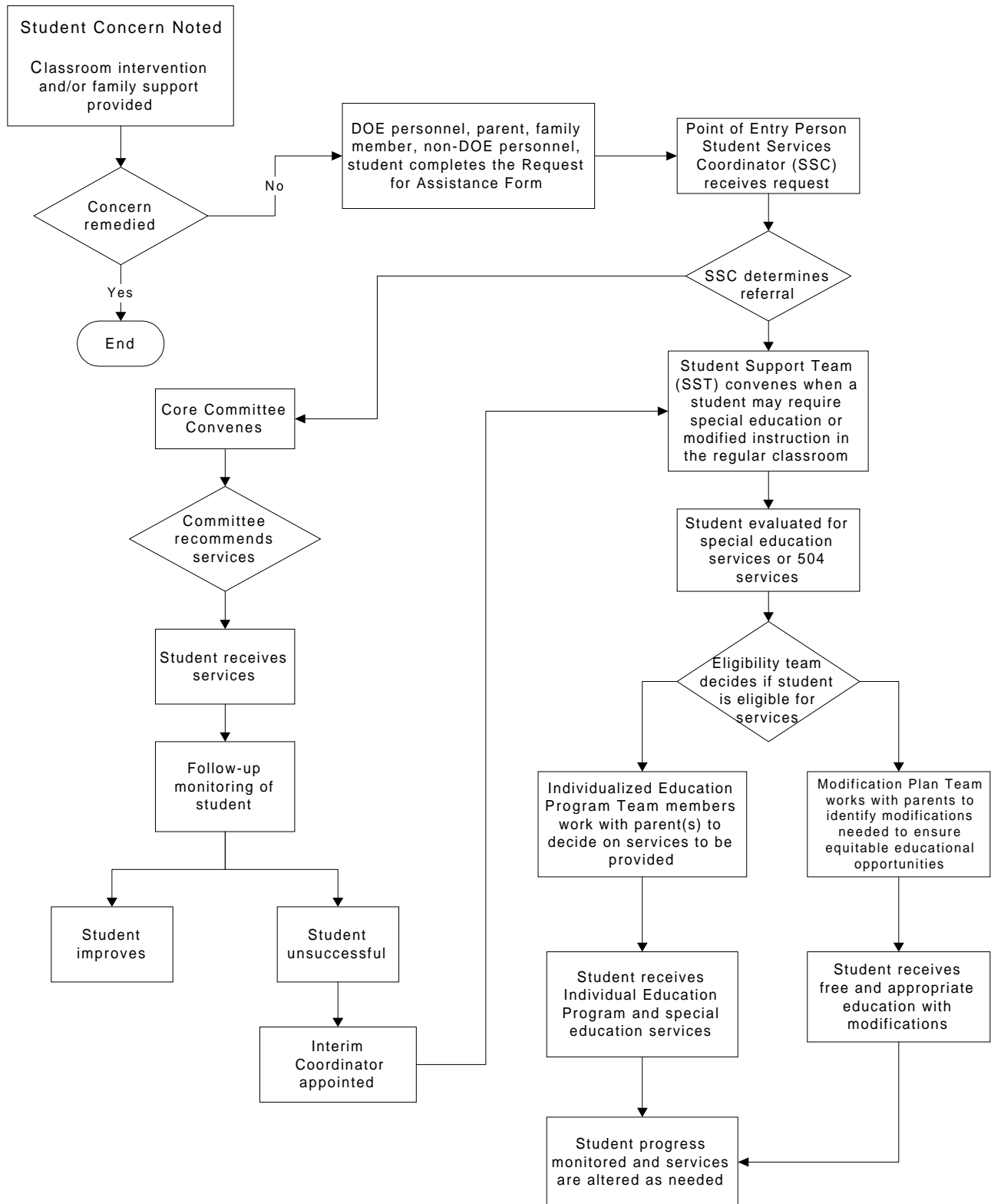
Since the department had already committed to realigning and redefining existing services under CSSS, creating a separate system of care for *Felix* students was seen as unnecessary. Instead, CSSS would become the vehicle to address the concerns that had led to the *Felix* consent decree.

The court monitor endorsed CSSS, and on March 20, 1997, the court ordered the department to submit a CSSS plan. The department responded by submitting its *Comprehensive Student Support System Implementation Plan* in November 1997 and subsequently submitted the *Felix Action Plan For the Provision of Services to Children with Disabilities*. The action plan reiterates that CSSS facilitates systemic change by raising performance expectations for all children and by preparing each student for a productive life.

### ***The Student Support Services Branch coordinates support services***

The department's Student Support Services Branch provides the leadership and support to ensure that CSSS is in place at every school. Within the branch, the Student Support Administration Section provides schools with appropriate technical assistance, coordinates student

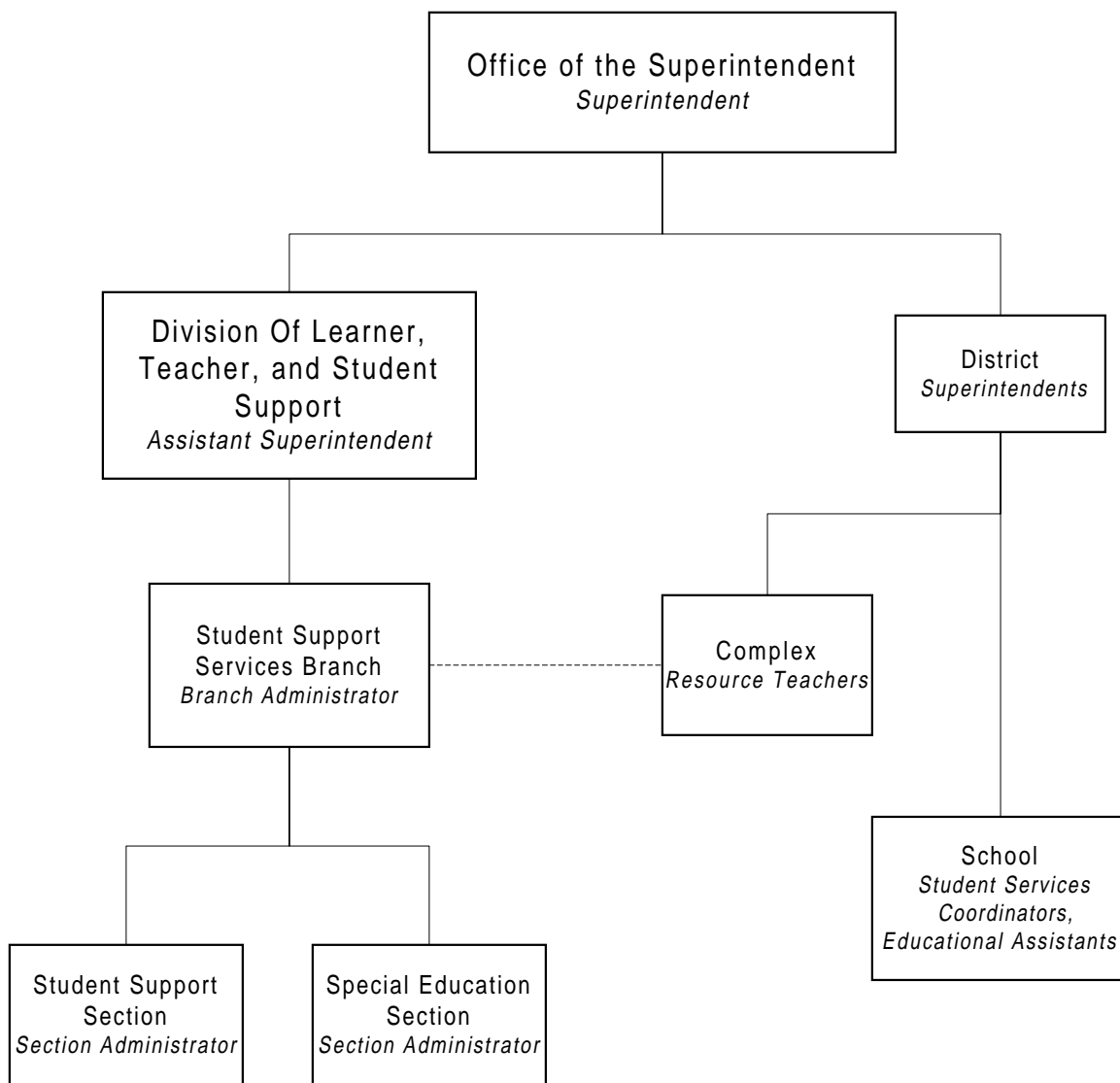
### Exhibit 1.1 Comprehensive Student Support System Referral Process



Source: Department of Education, Office of Accountability and School Instructional Support/Student Support Services Group, *Comprehensive Student Support System Operations Manual*, September 1999.

support services, and ensures that students' needs are met. The Special Education Section develops procedures, standards, policies, and rules for educating individuals with disabilities. This section also monitors schools and districts to ensure conformance with policies and education laws.

**Exhibit 1.2  
Comprehensive Student Support Services Organizational Structure**



Source: Department of Education.

Note: The current superintendent of education has reorganized the department. The Student Support Services Branch now reports directly to the assistant superintendent who oversees the Office of Curriculum and Instruction.

At the time of our audit fieldwork, the Student Support Services Branch director reported directly to the assistant superintendent of education who oversaw the Division of Learner, Teacher and School Support. The current superintendent has reorganized the department, so that the branch director now reports to the assistant superintendent who oversees the newly formed Office of Curriculum and Instruction.

A total of 115.5 full time equivalent (FTE) staff positions are currently assigned to the Student Support Services Branch. These staff include educational specialists for various support programs. In addition, the department has designated other staff to support the implementation of CSSS. Forty resource teachers are assigned at the school complex level to provide school-level staff with technical assistance. Although these resource teachers report to school renewal specialists assigned to each complex, they are responsible for communicating directly with state-level branch staff. Schools receive further assistance to implement CSSS from 273 student services coordinators, who are supported by 251 educational assistants. Every school is allocated at least one full-time student services coordinator. Schools with enrollment over 1,700 students and those with over 200 special needs students receive additional support. Exhibit 1.3 identifies the number of resource teachers, student services coordinators, and educational assistants allocated to each school district during school year 2000-01.

**Exhibit 1.3**  
**Comprehensive Student Support System Staff**  
**Allocated to Each School District, School Year 2000-01**

<b>District</b>	<b>Complex Resource Teacher</b>	<b>Student Services Coordinator</b>	<b>Educational Assistant</b>
Honolulu	6	58	54
Central	6	44	41
Leeward	6	46	41
Windward	4	33	31
Hawaii	8	43	40
Maui	7	33	29
Kauai	3	16	15
Total	40	273	251

Source: Department of Education, Student Support Services Branch.

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## Objectives of the Audit

1. Assess whether the Department of Education has effectively designed and implemented the Comprehensive Student Support System (CSSS).
2. Identify the staffing costs attributed to the administration and implementation of CSSS, and assess whether these staff meet qualification requirements and fulfill their duties.
3. Make recommendations as appropriate.

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## Scope and Methodology

This audit primarily focused on the period in which CSSS was implemented in all public schools statewide (school year 1999-2000 through June 30, 2001). We also reviewed early efforts to reform Hawaii's public education system as they relate to the development of CSSS. Although CSSS is a systemic approach to education, we did not review the operations of the entire department. Our review focused on the Student Support Services Branch, which is responsible for ensuring that CSSS is properly implemented.

Audit fieldwork included a review of applicable state and federal laws, department plans, policy manuals, and the department's budget and expenditures for student support services. We also interviewed branch-level, school-level, and former department staff; conducted surveys of school-level staff and parents/guardians; and reviewed the department's staffing and evaluations of CSSS.

Our work was conducted from June 2001 through January 2002 in accordance with generally accepted government auditing standards.

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# Chapter 2

## The Department of Education Used the *Felix* Consent Decree to Hastily Implement an Unproven and Costly Initiative

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The Comprehensive Student Support System (CSSS) supposedly reflects the Department of Education’s mission of meeting the needs of all students. However, the premature implementation of this reform effort bypassed several essential steps to successful systemic reform. Promoting CSSS as the means to achieve compliance with the *Felix* consent decree, the department funded the systemwide implementation of CSSS before completing a pilot demonstration project. Without the lessons learned from a completed demonstration project, CSSS has resulted in an inadequately planned, ill-defined, and difficult to implement system.

Implementation of CSSS included the creation of over 500 new staff positions, without clearly delineating their roles. Nevertheless, the department continues to fund CSSS under the pretext that it establishes the system of care required by the *Felix* consent decree.

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### Summary of Findings

1. The Department of Education prematurely expanded CSSS systemwide to comply with the *Felix* consent decree, resulting in a poorly defined reform effort that lacks accountability, effectiveness measures, and experiences difficulties in implementation.
2. The department created hundreds of additional staff positions to administer and implement CSSS without clearly delineating staff responsibilities and ensuring that staff are qualified to fulfill their duties.

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### The Department of Education Hastily Expanded CSSS Without Establishing a Solid Foundation for the Initiative

The Department of Education created CSSS as a systemic reform initiative incorporating the essential elements of Adelman and Taylor’s model for school reform. Adelman and Taylor, nationally recognized for their work on barriers to student learning, believe a process to facilitate change must serve as the foundation for effectively restructuring a school system. A major aspect of this process consists of building interest in and consensus for restructuring among stakeholders, including parents, to reduce potential opposition.



Adelman and Taylor also recommend phasing in changes through demonstration projects that allow for assessment of the initiative, engagement in problem-solving, and modification prior to systemwide implementation. Systemic reform can occur only with the proper foundation and supports in place, including ongoing assessments of whether objectives are being met.

The Department of Education did not follow this process when it implemented CSSS. It prematurely expanded the unproven CSSS demonstration project without ensuring that the foundation needed to support CSSS was in place. The department failed to adequately educate parents about CSSS even though the department views family participation as a critical element of student support. Furthermore, the department failed to develop meaningful performance measures, making it difficult to assess CSSS' implementation.

***The department hastily expanded CSSS to take advantage of the funding opportunity available through the Felix consent decree***

In 1994, the department promised to improve student performance by realigning and redefining existing resources through Success Compact, a reform initiative that evolved into CSSS. One of the initial goals was establishing a support system *without* additional funds. However, the department abandoned this goal when it realized that court-ordered compliance with the *Felix* consent decree could be used as justification for additional funding.

Specifically, the department proposed to utilize CSSS to develop and implement the system of care required under the decree, and received the court monitor's approval. On June 11, 1997, the court ordered the Departments of Education and Health to submit a plan for implementing the Comprehensive Student Support System. After informing the Legislature that denial of funding would result in a contempt order against the State, the departments received most of the requested funding and positions. In FY2000-01, the department allocated 420 CSSS positions at an approximate cost of \$13 million.

The *Felix* consent decree created a security blanket for CSSS that allowed the department to hastily implement the initiative without question. The department used the June 30, 2000 consent decree compliance date as a justification for proceeding quickly. The creation of the Student Support Services Branch to coordinate support services represented one of the department's first missteps. Because the department did not clearly establish the branch's authority, it was ineffective in coordinating intended support services. Furthermore, the department had not clearly defined the program budgeting criteria for student support services, making it difficult to identify the amount spent for this purpose.

### **The department expanded an unproven pilot project systemwide**

In school year 1996-97, the department initiated the Model School Complex Project as a pilot implementation of CSSS at three McKinley Complex schools. This demonstration project was initiated at nine schools prior to the federal court's mandate to implement CSSS at multiple school sites, starting with the 1997-98 school year. The Legislature required the department to expand the pilot project to a minimum of six additional complexes during the 1997-98 school year. As a result, the department piloted CSSS at 38 schools during the 1997-98 school year.

The department contracted with a consultant for \$35,000 to evaluate CSSS and to identify any necessary improvements; however, prior to the evaluation's completion, the department expanded CSSS to an additional 24 schools during school year 1998-99. In fact, the consultant completed the initial report in November 1998 and later finalized it in June 1999 – an entire school year after the department had expanded the demonstration project, and after the decision had been made to implement CSSS statewide in order to meet the timeframe of the *Felix* consent decree. A former department assistant superintendent opined that the department “prostituted” itself when it obtained CSSS funding through *Felix* which provided the court monitor with an opportunity to influence its development and implementation.

### **The Student Support Services Branch is ineffective in coordinating support services**

To ensure coordination and prevent unnecessary duplication of services and costs, the department should have given the Student Support Services Branch the ability to provide centralized oversight. However, the department did not establish criteria to adequately define and identify what programs the Student Support Services Branch should oversee to fulfill this purpose. Consequently, many support programs remain outside the branch's control and/or oversight, with some programs placed arbitrarily under its administration, while others are not. A former branch chief informed us that the failure to place all support programs within the newly created branch undermines the branch's purpose. As a result, student support programs remain fragmented and vulnerable to unnecessary duplication of support services.

We attempted to assess the extent to which the Student Support Services Branch coordinates services within the department by developing a working definition of support services: “services or programs provided to a targeted group of students or provided to students outside or beyond regular classroom instruction in the core subject areas.” We based this

definition on the CSSS model, which differentiates between classroom instruction and those support services that assist students in becoming successful learners in the regular classroom.

Using this definition, we reviewed the department's program descriptions and identified 91 student support programs existing within the department during FY2000-01. The Student Support Services Branch directly administers only 40 of the 91 programs we identified, meaning that the branch lacks oversight responsibility for most of the department's support service programs.

For example, the After-School Plus (A+) Program, a support service, provides care beyond the regular school day to a targeted group of students, latchkey children. The branch does not administer or have oversight over this program. Similarly, the branch does not administer or oversee a \$20 million support service program, Title I of the Improving America's School Act, which provides federal funding to help disadvantaged children meet high standards. A former administrator of the branch's Student Support Section agreed that Title I funds for disadvantaged students provide support services to schools. We found that the branch lacked oversight for \$77 million of the \$288 million allocated for student support programs during FY2000-01.

### **Program budgeting process for CSSS is not clearly defined**

Despite the systemic nature of CSSS, the Legislature expects the department to identify costs related to CSSS. In order to capture these costs, the department's budget process should, but does not, differentiate between student support services and classroom instruction costs. For example, a new budget program, EDN 150, *Comprehensive School Support Services*, was created in 1999. Because of its similar title, it can be mistakenly concluded that EDN 150 represents the CSSS budget, when in actuality it consists primarily of special education funding. In fact, CSSS-related funds are in fact accounted for under other program budget areas, including EDN 100, *School-Based Budgeting*, as well as EDN 150 funds. The department's failure to define support services not only makes it difficult to accurately identify costs attributed to these services but also to budget and account for these services. As a result, the department cannot effectively manage program costs.

### ***The foundation needed to support CSSS is not in place***

Successful systemic reform requires a strong foundation, including leadership and direction. However, as discussed previously, the Student Support Services Branch lacks sufficient oversight and authority, which results in ineffective leadership. Moreover, the department issued an inadequate CSSS operation manual, which adds to the confusion and makes implementation at the school level even more difficult. The

manual, based on a middle school model, cannot be easily implemented in other types of schools.

The department also failed to provide CSSS staff with adequate space and equipment. The department expanded CSSS statewide without ensuring the existence of these key elements. Moreover, as discussed later in this report, the department did not adequately prepare staff to implement CSSS.

### **Schools are not given adequate direction to implement CSSS**

The department developed a CSSS operational manual during 1999 to help schools understand and implement CSSS; however, it provides only minimal guidance. For example, most of the manual merely described CSSS components with minimal direction on actual implementation. Rather, the section on implementation focused on evaluative progress indicators. In fact, the manual discussed each school's unique implementation of CSSS and left the creation of procedures at each school's discretion.

A former branch administrator characterized the branch's approach as an attempt to increase school-level decision-making. Although balancing school-level decision-making with managerial oversight may be difficult, the two should not be confused. Nevertheless, because of the branch's lack of authority over individual schools, its role consists of simply promoting CSSS without offering schools the guidance and direction necessary for successful implementation.

Additionally, schools commented on the branch's untimely directives. For example, it created a CSSS database to track student referrals for support services. However, student services coordinators complained that the branch directed them to exclude students receiving certain services from the CSSS database pending forthcoming written procedures. Schools received these written procedures after the deadline for inputting the data had already passed.

Staff also commented that the branch does not provide sufficient notice and explanation after the modification of special education forms. These staff said they became aware of changes made to special education forms only when they entered data into the Integrated Special Education System (ISPED). One teacher who responded to our survey wrote: "constant changes to the process have made it harder to grasp and maintain continuity in understanding CSSS."

### **The referral process is based on a middle school model that is not easily adapted to other schools**

The CSSS operations manual requires that the student services coordinators or a designated point-of-entry person receive all completed

Request for Assistance Forms. The form tracks students through the system and ensures that students do not “fall through the cracks.” The student services coordinator may assign either a core committee or student support team to review the referral.

Typically comprised of the student services coordinator, counselor, and teacher or administrator, core committees make immediate decisions regarding school-level interventions and may recommend referral to a student support team for more intensive cases. Student services coordinators may refer those students they suspect will require an evaluation for special education or 504 modifications directly to the student support team. Student support teams typically include the student services coordinator, counselor, teachers, a school administrator, and parents.

This service referral process establishes a single point of entry and supposedly increases accountability by allowing the department to follow all students receiving support services. Staff at middle schools we visited adjusted to the prescribed referral process better than other types of schools because the use of core teaching teams to address student concerns reflects the middle school model. This approach allows staff to share ideas and removes decision-making from a single individual. The middle schools we visited allowed their already existing core teaching teams to function as CSSS core teams. Teachers at these schools could meet on a regular basis to discuss student concerns and service referrals since middle schools’ schedules designate meeting periods for all core teams.

Requiring teachers to participate in numerous meetings that may interrupt classroom teaching makes this model impractical for some schools. Several elementary and one high school teacher we interviewed indicated that the referral process overburdens them, imposing an additional, onerous requirement. They believe the referral process creates unnecessary paperwork and requires their presence at meetings without accommodating their teaching schedules. As a result, some schools attempted to streamline the referral process by deviating from the single point of entry requirement. These schools allowed teachers to refer students directly to specific support services, including the Gifted and Talented and English for Second Language Learners programs.

### **Schools lack facilities and equipment to accommodate additional support staff**

The department hired additional staff to implement CSSS, but failed to ensure adequate facilities and equipment. In addition to 273 student services coordinators and 252 educational assistants (for FY2000-01), the department also assigned social workers, school-based behavioral health therapists, and psychologists to the complexes to provide students

with mental health services as part of its School-Based Behavioral Health Program. The program, embedded in and aligned with CSSS, reflects the Department of Education's takeover of the Department of Health's administration and provision of low-end or less intensive mental health services as of July 1, 2001.

Schools report that increased staffing has not been accompanied by adequate increases in the resources and tools dedicated to these staff. This creates a hardship for principals who must accommodate these needs within the limits of existing resources and within facilities that were not designed and built to accommodate behavioral health treatment staff. Consequently, staff informed us that schools lacked office space, chairs, desks, and computers, and principals reported housing staff in libraries, hallways or closets. We observed these arrangements at a few of the schools we visited. The lack of appropriate facility space and other resources impairs the ability of staff to perform their duties and indicates the department's rushed implementation of CSSS.

***The department has not enabled parents to fulfill their role in implementing CSSS***

Federal laws promoting educational reform, such as Title I of Improving America's Schools Act of 1994 and Goals 2000: Educate America Act, cite research indicating that substantial, ongoing family involvement in children's learning is a critical link to achieving high-quality education and a safe, disciplined learning environment. Furthermore, the Individuals with Disabilities Education Act (IDEA) requires schools to provide parents with meaningful opportunities to participate in their children's education and guarantee parents of disabled children the right to participate in every decision related to their child's identification, evaluation, and placement.

The *Felix* consent decree also emphasized family involvement through the Hawaii Child and Adolescent System Service Principles (CASSP), which the Department of Education incorporated into CSSS. CASSP principles recognize that families should participate fully in all aspects of planning and delivering services. The CSSS operations manual also promotes family participation and even establishes it as an indicator for measuring the CSSS' progress. However, schools have not routinely informed parents about available support services.

**The majority of parents are unfamiliar with CSSS and student support services**

We distributed surveys to a random sample of 1,200 parents of public school students in preschool through grade 12 to measure parental awareness of CSSS. A total of 271 parents responded, yielding a margin of error of 6 percent with a 95 percent confidence level. Fifty-five percent of parents reported unfamiliarity with CSSS. Additionally,

approximately 27 percent of the respondents indicated a lack of familiarity with support services available at their children's schools. Another 45 percent indicated some familiarity.

### **Not all schools inform parents of available support services**

Schools have neglected their duty to inform parents of all available support services. Seven, or 23 percent, of the thirty-one schools we visited did not formally inform all parents of the services available at their schools. One of these schools provided this information only to parents with children already identified as needing additional support. The failure of these schools to provide parents with this key information may adversely impact the parents' ability to proactively seek assistance for their children.

### ***The department cannot assure the efficient use of resources dedicated to implement CSSS***

A necessary component of successful program design, evaluation can alert management to problems and the need for corrective action. However, for meaningful evaluations, the department must establish clear and measurable performance standards and collect valid data. The department lacks these essential components in its system design, rendering it incapable of determining CSSS' effectiveness.

Furthermore, despite the development of ISPED and CSSS databases for housing student information related to support services, these databases have been long in development and short on execution. The department hired consultants to assess CSSS' effectiveness. However, incomplete data extracted from the CSSS database invalidates the report results and any related conclusions.

### **The department has not established meaningful CSSS performance standards**

Although the CSSS operations manual states the department will evaluate CSSS to improve its development, satisfy routine accountability needs, and guide further expansion, it does not establish performance standards to assess CSSS' effectiveness. The failure to establish clear performance standards results in arbitrary assessments of its effectiveness. For example, administrative rules establish strict timeframes for determining a student's eligibility for IDEA and Section 504 and for delivering needed services. However, the department lacks a standard for students who require additional supports that fall outside special education and 504.

Consequently, student services coordinators established their own criteria to determine whether students receive services in a timely manner. Coordinators we interviewed assessed the timeliness of services by establishing their own timeframes, which the core team must meet

following the referral. The coordinator-established timeframes ranged from one week to 20 days. Although the CSSS database was updated to inform staff that core team and student support team meetings should be held within 14 days of receiving student referrals, it does not specify a timeframe for service provision.

The department's consultant reports lacked clear performance standards. The majority of these reports merely reported irrelevant data and did not address timeliness of services. For example, a consultant reported lags between anticipated and actual service delivery dates. Instead, the consultant should have compared the date of eligibility for services or referral to specific services to the actual service delivery date. The consultants also did not assess whether CSSS resulted in better coordination of student support services. A department evaluation specialist commented on the difficulty of measuring this latter goal and how evaluators may need to rely on parental input.

### **The ISPED database is deficient**

The department dedicated considerable resources to ISPED's development with the intent of addressing the *Felix* consent decree's requirement that the department develop a seamless management information system. The department anticipated ISPED would assist staff by reducing paperwork, streamlining data collection, and delivering timely and accurate information. However, ISPED has been inundated with problems, resulting in spiraling costs that increased from \$2.1 million to \$5 million, and a two-year delay in implementation.

The department initially contracted with InfoCal LLC during 1999 to develop an integrated management system that would be operational by December 2000. However, development stalled during September 2000 when the department could not agree on what data ISPED would maintain. In addition, a delay also occurred when the department discovered that Department of Health staff had access to non-special education records, and that teachers could access the records of students not in their classes. As a result of these disagreements and confidentiality breaches, the contractor could not develop a fully operational system by the promised delivery date.

Many staff at the schools we visited informed us that the system's extremely slow response time made it difficult for them to enter required data as well as attend to their other duties. As a result, some staff stopped entering data into ISPED altogether, while others attempted to enter as many student records as they could by accessing ISPED during "off hours," such as weekends, late evening, and early morning hours. Consequently, the database contains incomplete student records and compromises the integrity of evaluation reports utilizing the data.



Staff also reported that the system would disconnect itself after a period of time, which meant starting over and often experiencing further delays. Because of these problems, staff continue to manually complete special education forms on paper, without reducing paperwork as was promised. On the contrary, staff find that ISPED creates additional work. Report No. 02-11, *Audit of the School-Based Behavioral Health Program*, confirmed these problems.

The superintendent informed us that ISPED's response time has improved since our October and November 2001 visits to the schools. However, on January 9, 2002, we observed an educational assistant entering basic student information (name, address, emergency contact) for one student into ISPED. It took the educational assistant approximately 20 minutes to complete the required fields. Although this demonstrated an improvement over claims that staff sometimes needed an entire day just to enter data for one student, it appears the response time may still be unreasonable given the multitude of student data that staff must enter into the ISPED database. Furthermore, ISPED has proved unreliable as reflected in the ISPED bulletin, which indicated that the system was down 12 times between August 29, 2001, and January 9, 2002.

### **The CSSS database is deficient**

The department created the CSSS database to account for all student referrals for support services. The ISPED database keeps additional records for students eligible for special education and 504 modifications. Although less prone to shutdowns than ISPED, the CSSS database also contains incomplete data. Additionally, some staff assigned to enter student information do not have user codes to access the CSSS database.

Both the CSSS and ISPED databases create more work for schools without demonstrating a benefit to school staff. For example, staff must enter the same information into both databases for students who receive special education services or classroom/instructional modifications. This contradicts ISPED's goal of integrating systems to avoid redundant data collection. Aware of the problem, the department has appointed a committee to address streamlining its data collection efforts.

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## **The Department Did Not Adequately Plan CSSS Staffing**

The department failed to take into account effective human resource management when developing CSSS. Management failed to prepare staff to accept and support the needed change, and did not formalize the roles and responsibilities of those involved with CSSS implementation. As a result, staff do not fully embrace CSSS, making implementation difficult.

***The department has not adequately prepared staff for CSSS' implementation***

Staff did not have adequate opportunities to contribute to CSSS' design. Consequently, staff largely viewed the initiative with skepticism and resistance. Although the department has increased its effort to educate staff about changes resulting from CSSS, it had not provided staff with adequate support and training to implement classroom intervention strategies.

**Perceived shifts in the department's reform efforts fuel resistance to CSSS**

The department's initial failure to clearly articulate CSSS' correlation to the department's Success Compact—an earlier reform initiative focusing on student literacy—left staff with the notion that CSSS replaced Success Compact. School-level staff's resistance to CSSS could have been avoided had the department involved them in the early efforts and clearly communicated the relationship between the two initiatives. Staff informed us that the department's newly appointed superintendents have historically engaged in short-lived reform initiatives, and they expressed a reluctance to embrace CSSS because they believe that this reform initiative will not last.

**Teachers need additional support and training to provide classroom intervention strategies**

All staff need support to fulfill their roles of ensuring effective system change. However, the department failed to provide classroom teachers with sufficient training to facilitate classroom intervention strategies (level one support services). Teachers expressed frustration that the department expects them to meet all students' needs without sufficient training in classroom interventions. Many teachers indicated that their greatest challenge was providing individualized education for a broad spectrum of students without any support. Teachers also noted that most CSSS training had been theoretical with little practical use.

We surveyed 796 teachers to assess their understanding of CSSS. Two hundred seventy-five teachers responded to our survey, yielding a 6 percent margin of error with a 95 percent confidence level. Over one-third of the teachers responding to our survey indicated that they received insufficient CSSS training. Furthermore, 22 percent indicated that they either did not understand CSSS very well or at all. In fact, one teacher responded that her school had not even implemented CSSS.

We also surveyed all school principals, high-risk counselors, student services coordinators, and CSSS educational assistants. Although these staff indicated they understand CSSS better than teachers, their responses also show that the department needs to increase all school staff's level of understanding for CSSS. For example, nearly 20 percent of the CSSS educational assistants responding to our survey indicated

they do not understand CSSS very well. Moreover, only 55 percent of the student services coordinator respondents, a key school level position for implementing CSSS, indicated that they understand CSSS completely. In fact, some respondents believed CSSS serves only special education or at-risk students, rather than all students. Exhibit 2.1 shows the extent of understanding school level staff have for CSSS.

**Exhibit 2.1  
School Staff's Level of Understanding of CSSS**

Respondent	Level of Understanding CSSS (Percent of Respondents)				
	Completely	Somewhat	Not Very Well	Not at All	Other
Principal	75%	21%	0%	1%	3%
Teacher	17%	57%	16%	6%	4%
High Risk Counselor	40%	48%	4%	1%	7%
Student Services Coordinator	55%	36%	2%	0%	7%
CSSS Educational Assistant	11%	61%	18%	9%	2%
<b>All Survey Respondents</b>	<b>38%</b>	<b>45%</b>	<b>8%</b>	<b>3%</b>	<b>6%</b>

Note: "Other" includes surveys with no response or those in which the respondent wrote "don't know."

***Responsibilities for newly created positions remain unclear***

The department should carefully plan staffing needs and establish accurate position descriptions to ensure the efficient use of personnel. However, the department did not adequately plan CSSS staffing requirements. For example, the department spent over \$12 million during FY2000-01 for the student services coordinator and CSSS educational assistant positions without first clearly delineating their functions. Moreover, each school district established its own position descriptions for staff responsible for implementing the School-Based Behavioral Health Program. Consequently, staff in varied positions have similar functions, and some staff lack proper qualifications.

### **Student services coordinators' responsibilities continue to grow**

Although the department established a written position description for student services coordinators, it allows principals broad discretionary authority over these staff since the department believes that the roles and functions of the coordinators could “best be defined within the school when related to and integrated with the roles and functions of other existing pupil personnel services staff.” Consequently, student services coordinators may perform any of the major duties outlined in their position description, as well as any other related duties and tasks assigned by school principals.

Only half of the student services coordinators responding to our survey indicated that they spend over 90 percent of their time implementing CSSS. Another 15 percent of the coordinators indicated that they spent only one-fourth to one-half of their time on CSSS. They reported helping with other school duties, including serving as the advisor to the Junior Police Officers (JPOs), and mentoring special education teachers.

Many student services coordinators indicated that their duties further increased when the department dissolved district diagnostic teams and implemented the School-Based Behavioral Health Program. Taking over the diagnostic teams' duty of administering evaluation assessments, some coordinators indicated they needed training in interpreting evaluation results. Additionally, their responsibilities now include procuring and monitoring school-based behavioral health services and possible responsibility for more intensive behavioral health needs, such as autism services.

Both principals and student services coordinators indicated that the demanding workload has made the student services coordinator position unattractive and difficult to fill. High burnout and turnover result from working 10 to 12 hours on school days, and working on weekends, holidays, and during vacations.

Aware of the student services coordinators' frustration, the Hawaii State Teachers' Association challenged the leeway given to principals in using these staff. The union filed a grievance on November 16, 1999, alleging that the role of the student services coordinators was altered without first consulting the union. As a result, the former superintendent issued a memo to department staff during February 2000 advocating the student services coordinators' roles at each school be clarified. He urged principals to maintain the position's integrity and not overburden these staff. Guidelines included reminders that “the roles and responsibilities of the SSC (student services coordinator) at each school must be clearly linked to supporting the success of school-based services.” However, the teachers' union continues to have concerns regarding the workload of these staff and informed us that it will pursue this issue.

### **The role of CSSS' educational assistants lacks clarity**

The department has not clearly established the qualifications and duties for CSSS educational assistants. Although a draft position description exists for these staff, we found that the actual duties of these staff are different. According to the position description, CSSS educational assistants should spend approximately 60 percent of their time providing students with intervention activities; attending and participating in support team meetings; communicating with parents, teachers, school support staff, and community support agencies; and collecting student data through observations or evaluation activities. Only 30 percent of their time should be spent on such clerical duties as maintaining student data records. However, school staff indicated that educational assistants rarely work directly with students; instead they spend most of their time on clerical tasks, such as entering data into the ISPED and CSSS databases.

The department also hires educational assistants to help in special education classrooms. However, unlike the CSSS educational assistants, these staff predominantly work directly with students, as indicated by the class specification for educational assistants. The practice of assigning CSSS educational assistants tasks that are largely clerical in nature creates pay inequities between educational assistants and other clerical staff paid at a lower rate.

The Department of Human Resources Development recruits educational assistants; however, this duty was expected to be transferred to the Board of Education effective July 1, 2002. The Department of Education must resolve pay inequities resulting from differences between the actual and proposed duties of the CSSS educational assistants. The department should determine the role of these staff, finalize position descriptions in accordance with that role, and appropriately classify these positions upon their transfer to reflect the nature and complexity of the job duties.

Although the CSSS educational assistants who predominantly engage in clerical tasks may currently be overpaid, confusion over their role led to lost career opportunities for some of them. Those who participated in the department's Project RISE, recently learned that they would be unable to successfully complete the practicum component of the program because they do not have direct interaction with students. The department developed Project RISE, which provides a career ladder for educational assistants who successfully complete the program's coursework and practicum. However, CSSS educational assistants who participated in this program, believing that it would provide them with a means toward advancement, are no longer eligible for these opportunities.

### **Staff in various positions perform similar duties**

Unclear staff roles have resulted in various staff performing similar duties. For example, the newly created student services coordinator position appears to be similar to that of school counselors. The position description for school counselors indicates they are responsible for coordinating student services, a key function of the student services coordinator.

Similarly, distinctions between staff assigned to provide school-based behavioral health services are also vague in some districts. For example, some districts require both school-based behavioral health therapists and social workers to provide group, individual, and family counseling. A social worker we interviewed confirmed the lack of a clear distinction between their current duties and those of school-based behavioral health therapists. The department recognizes the similarities between these positions and plans to consolidate them into one position. The department's personnel office also informed us that it planned to standardize the position's roles and responsibilities.

### ***Not all school-based support staff are qualified for their duties***

Department staff informed us that some school-based support staff lack qualifications for their duties. A school counselor informed us that staff serving as behavioral health therapists lack the educational background and training necessary to work with students with high-end or more intensive needs. The counselor indicated that their training is no different from school counselors' training and that she would be uncomfortable providing behavioral health therapy to these students.

School social workers who formerly worked at the district level also reported they do not feel they have received adequate training for their current roles at the school, which involve providing students with long-term counseling and/or therapy. One social worker reported that while working at the district level, she only occasionally met with students during crisis situations. She informed us that she believes she lacks competency in the performance of her current duties. This creates a dilemma for school principals responsible for accommodating student needs with qualified staff.

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## **Conclusion**

CSSS is not a new concept. It is based on the belief that all students can achieve when the proper supports are in place. What is new to CSSS is the department's attempt to formalize a management control system that tracks students who need support services in order to prevent them from "falling through the cracks." However, the department did not properly design and plan the framework for this system. Instead, it used the *Felix* consent decree to obtain funding and consequently was forced to rush the

statewide implementation of CSSS in order to ensure compliance with the federal court order. As a result, support services remain fragmented, staff roles are unclear, and unqualified staff may provide school-based services. Furthermore, problems with the department's information management systems have resulted in incomplete databases that fail to track students' progress and leave the department unaccountable for the millions it has spent to implement CSSS. Although CSSS' intentions may be commendable, the department's failure to adequately plan its implementation leaves schools without proper direction and support.

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## Recommendations

1. The Department of Education should reexamine the Student Support Services Branch to ensure that it can effectively and efficiently oversee and direct the implementation of the CSSS student support component.
2. The department should ensure that program costs for all support services, including special education, are readily identifiable and available to the public and decision makers.
3. The department should work to gain the support of school level staff in its implementation of CSSS. Specifically, the department should:
  - Improve its CSSS training by moving beyond a systems overview to providing teachers with sufficient training and classroom strategies to ensure the successful implementation of CSSS;
  - Reconsider its referral process and ensure its feasibility in all schools;
  - Develop a plan to address the facility space and equipment requirements for school-based behavioral health staff; and
  - Ensure all schools educate parents about CSSS and available support services.
4. The department should improve its ability to assess the effectiveness of CSSS by:
  - Establishing meaningful performance standards that correspond to CSSS' goals; and
  - Expediting its plans to integrate the CSSS and ISPED databases.

5. The department should ensure all newly created positions are necessary and that staff filling these positions are qualified to perform their duties. Specifically, the department should:
  - Review the student services coordinator position and establish reasonable job duties. The position description should be revised to remove the broad flexibility currently afforded school principals in determining the staff's roles;
  - Finalize CSSS educational assistants' position descriptions and ensure that their classification is consistent with the nature of the work assigned to the position;
  - Review the roles and duties of all school support staff and establish standard position descriptions for these staff that eliminate duplication in staff roles; and
  - Consult with the Department of Health and the Department of Human Resources Development to define and standardize qualification requirements for staff providing school-based behavioral health services.



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## Responses of the Affected Agencies

### Comments on Agency Response

We transmitted a draft of this report to the Department of Education and Board of Education on August 21, 2002. A copy of the transmittal letter to the department is included as Attachment 1. A similar letter was sent to the board. The department's response is included as Attachment 2. The board chose not to respond to the draft report.

The department acknowledges it expanded CSSS systemwide before completing its demonstration project in order to meet the *Felix* consent decree mandates. The department reports it has since identified and prioritized areas needing improvement, which has resulted in a stronger link between the instructional and management components of CSSS, clarification of CSSS' referral process, the redefinition of CSSS staff positions, and professional staff training. The department also reports that it is updating its CSSS operations manual, which it expects to distribute during Spring 2003. The department also provided details on how it is implementing each of our specific audit recommendations.

However, we note the following clarifications of our recommendations. When responding to our recommendation that the department reexamine the role of the Student Support Services Branch, the department indicated that it must continuously assess its organizational structure to provide schools and students with high quality services in an effective manner. Our point is that while working towards this goal, the department must assure that all organizational support units have the authority necessary to fulfill their responsibilities. The department should even consider whether it is appropriate to have a Student Support Services Branch since, by definition, CSSS encompasses the entire education system.

We also note that the department reports that EDN 150 was established within the budget to identify and track the many programs that clearly provide support services to students. However, the department indicates that it can be difficult to categorize programs and services into this distinct area. We believe the department's response does not clearly explain how it intends to identify all student support services costs, including special education.

STATE OF HAWAII  
OFFICE OF THE AUDITOR  
465 S. King Street, Room 500  
Honolulu, Hawaii 96813-2917



MARION M. HIGA  
State Auditor  
(808) 587-0800  
FAX: (808) 587-0830

August 21, 2002

**COPY**

The Honorable Patricia Hamamoto  
Superintendent of Education  
Department of Education  
Queen Liliuokalani Building  
1390 Miller Street  
Honolulu, Hawaii 96813

Dear Ms. Hamamoto:

Enclosed for your information are three copies, numbered 6 to 8 of our confidential draft report, *Audit of the Department of Education's Comprehensive Student Support System*. We ask that you telephone us by Friday, August 23, 2002, on whether or not you intend to comment on our recommendations. If you wish your comments to be included in the report, please submit them no later than Friday, August 30, 2002.

The Board of Education, Governor, and presiding officers of the two houses of the Legislature have also been provided copies of this confidential draft report.

Since this report is not in final form and changes may be made to it, access to the report should be restricted to those assisting you in preparing your response. Public release of the report will be made solely by our office and only after the report is published in its final form.

Sincerely,

A handwritten signature in cursive script, appearing to read "Marion M. Higa".

Marion M. Higa  
State Auditor

Enclosures



**STATE OF HAWAII**  
DEPARTMENT OF EDUCATION  
P.O. BOX 2360  
HONOLULU, HAWAII 96804

OFFICE OF THE SUPERINTENDENT

August 29, 2002

RECEIVED  
AUG 29 2 38 PM '02  
OFFICE OF THE AUDITOR  
STATE OF HAWAII

Ms. Marion M. Higa  
State Auditor  
Office of the Auditor  
465 S. King Street, Room 500  
Honolulu, Hawaii 96816-2917

Dear Ms. Higa:

Thank you for the opportunity to respond to the *Audit of the Department of Education's Comprehensive Student Support System (CSSS): A Report to the Governor and Legislature of the State of Hawaii*. The research conducted for this report is extensive and generates recommendations to improve the system.

The Department of Education (DOE) concurs with the report that the mission of CSSS is to provide all students with a support system so that they can be productive and responsible citizens. CSSS attempts to achieve this by providing students with an integrated support system and improving access to a full array of support services. By implementing CSSS to address students' social, emotional and physical needs, the Department hopes to raise the academic performance of all students.

The Department also acknowledges that CSSS was implemented system-wide before completion of the demonstration project in order to meet the Felix Consent Decree mandates. Since then, efforts to identify and prioritize areas of improvement have resulted in a stronger link to the instructional and management components of CSSS, clarification of the CSSS referral process, redefinition of staff positions, and focused professional development sessions on CSSS throughout the DOE. In addition, the Department is updating the CSSS manual, which is expected to be ready for distribution in Spring 2003.

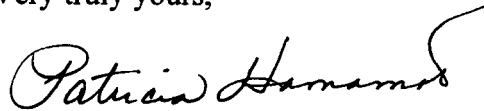
We also recognize the need for continual system improvement to support students as they strive to attain the Hawaii Content and Performance Standards II, and appreciate the findings of the report. To this end, the Department will continue working on the recommendations of the State Auditor, which are both reasonable and doable.

Ms. Marion M. Higa  
August 29, 2002  
Page 2

Finally, we would just note that the report states that the Student Support Services Branch Director now reports to the Assistant Superintendent who oversees the newly formed Office of Curriculum and Instruction. The official title is the Office of Curriculum, Instruction and Student Support.

Please feel free to contact Ms. Estelle C. Wong, Director of the Student Support Services Branch, at 733-4400, if there are any questions regarding these comments. I look forward to the issuance of your final report.

Very truly yours,



Patricia Hamamoto  
Superintendent

PH:lsr

Attachment

c: Office of Curriculum, Instruction and Student Support  
DOE Internal Auditor  
Board of Education

## RESPONSES TO THE RECOMMENDATIONS

1. *The Department of Education should reexamine the Student Support Services Branch to ensure that it can effectively and efficiently oversee and direct the implementation of the CSSS student support component.*

The Department believes that it must continuously assess its organizational structure, including that of the Student Support Services Branch (SSSB), in order to provide schools and students with high quality services in an efficient and effective manner. For example, as of July 1, 2002, the English as a Second Language Learners (ESLL) and the Gifted and Talented (GT) programs were shifted to the Instructional Services Branch from the SSSB since instructional considerations are a major part of these programs. Similarly, the Family Literacy Program was moved into SSSB from the School and Community Leadership Branch to centralize family support efforts.

Finally, SSSB has begun to integrate the professional development activities, especially where common audiences are involved. For example, the staff for various programs such as CSSS, Positive Behavior Support, and School-Based Behavioral Health have conducted joint trainings on a number of occasions.

2. *The department should ensure that program costs for all support services including special education, are readily identifiable and available to the public and decision makers.*

Department programs and services must ultimately result in high student achievement. Included are quality (1) management practices, (2) classroom curriculum and instruction, and (3) student support services that eliminate barriers to learning. While it is difficult to categorize all programs and services into any one of these three discreet areas, EDN 150 was established within the Department's budget to identify and track the many programs that clearly provide support services to students. The Department will continue to assess its programs to see where they operationally should be best placed within the organization.

3. *The department should work to gain the support of school level staff in its implementation of CSSS. Specifically, the department should:*

- *Improve its CSSS training by moving beyond a system overview to providing teachers with sufficient training and classroom strategies to ensure the successful implementation of CSSS;*

The Department has developed instructional guides for teachers to address the Hawaii Content and Performance Standards II:

Language Arts Performance Indicators  
Mathematics Performance Indicators

Science Performance Indicators  
Social Studies Performance Indicators  
Integrated Strategies for Diverse Learners through the Arts  
Project-Based Learning

These guides include content (what to teach) as well as strategies (how to teach). Similar instructional guides for other content areas are currently under construction.

Professional development sessions for classroom teachers that are coordinated by the Instructional Services Branch will begin in September 2002, when the instructional guides placed on compact discs, will be distributed to the schools. Additionally, the Student Support Services Branch schedules professional development sessions for classroom teachers on differentiated instruction for the diverse learner and on behavioral strategies for the disengaged learner.

- *Reconsider its referral process and ensure its feasibility in all schools,*

The data shows that this single-point-of-entry referral process is “best practice” with high yield results. There is still a need for training in this area to make it operationally more user friendly and time efficient.

*Develop a plan to address the facility space and equipment requirements for school-based behavioral health staff; and*

The SSSB is working with the Facilities and Support Services Branch to ensure that space needs and accommodations for SBBH staff, located at various worksites, are included in the design specifications of new schools and renovations of existing facilities. Additionally, SSSB now works with the Budget Branch to determine the necessary funding for equipment requirements of SBBH staff.

*Ensure all schools educate parents about CSSS and available support services.*

Schools will be required to present evidence to the State office that they have informed the school community about CSSS and their available support services, through such means as brochures, parent workshops, PTA and SCBM meetings, and parent bulletins, by the end of semester one of the 2002-2003 school year. This will include parents other than those of students receiving 504 or special education services. The information will be analyzed to determine the extent of the schools’ efforts to educate parents about CSSS; and the need for additional services will be provided in this area, as necessary.

The SSSB publishes a monthly bulletin, which provides updates on the various features of CSSS. This bulletin, which is distributed to every school with sufficient copies for all staff members, can also be shared with parents and the community. In addition, it can be accessed through the SSSB website that is linked to the DOE’s main website.

4. *The department should improve its ability to assess the effectiveness of CSSS by:*

- *Establishing meaningful performance standards that correspond to CSSS' goals; and*

As part of their annual CSSS Progress Indicators reporting activities, the Department has established that schools provide evidence, which meets the CSSS Goals of:

Providing students with comprehensive, coordinated, integrated, and customized supports that are accessible, timely, and strength-based so that they can achieve in school;

Involving families, fellow students, educators, and community members as integral partners in the provision of a supportive, respectful learning environment;

Integrating the human and financial resources of public and private agencies to create caring communities at each school.

This information can be used for school improvement efforts, related to *Quality Student Support* in the school's Standards Implementation Design Action Plan.

- *Expediting its plans to integrate the CSSS and ISPED databases.*

The Department is currently working to link the various DOE databases to a data store system that will enable the State, districts and schools to retrieve student information required for evaluation and decision-making. The Department has hired a consultant to expedite this process with a focus on economizing users' efforts and time requirements.

5. *The department should ensure all created positions are necessary and that staff filling these positions are qualified to perform their duties. Specifically, the department should:*

- *Review the student services coordinator position and establish reasonable job duties. The position description should be revised to remove the broad flexibility currently afforded school principals in determining the staff's roles;*

The Department is currently working with Bargaining Unit 05 to clarify the role of the SSC. This is projected to be completed by December 2002.

- *Finalize CSSS educational assistants' position descriptions and ensure that their classification is consistent with the nature of the work assigned to the position;*

The Department is currently revising the CSSS educational assistant (school-based services educational assistant) position to reflect their actual tasks and responsibilities, which are more clerical in nature. This includes working with the Office of Human Resources and Bargaining Unit 03 to reclassify the position so that by the school year 2003-2004, the changes will be implemented.

- *Review the roles and duties of all school support staff and establish standard position descriptions for these staff that eliminate duplication in staff roles; and*

The Department is currently working with the Department of Human Resources Development (DHRD) to combine and standardize job classes that were developed in isolation, labeled differently, but essentially performed similar functions. Ultimately, these positions will comply with the provisions of Act 253 – Civil Service Reform.

- *Consult with the Department of Health and the Department of Human Resource Development to define and standardize qualification requirements for staff providing school-based behavioral health services.*

The Department is closely collaborating with the DHRD to define standard qualifications and professional functions of School-Based Behavioral Health personnel and align them with civil service guidelines and practices. The first phase is being implemented with the transfer of Clinical Psychologists VIII and VI positions from exempt to civil service.