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# **Audit of the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program of the Department of Education**

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

Report No. 96-2  
January 1996



**THE AUDITOR**  
STATE OF HAWAII

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## The 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.

Under its assigned missions, the office conducts the following types of examinations:

1. *Financial audits* attest to the fairness of the financial statements of agencies. They examine the adequacy of the financial records and accounting and internal controls, and they determine the legality and propriety of expenditures.
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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9. *Special studies* respond to requests from both houses of the Legislature. The studies usually address specific problems for which the Legislature is seeking solutions.

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## THE AUDITOR STATE OF HAWAII

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# OVERVIEW

THE AUDITOR  
STATE OF HAWAII

## Audit of the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program of the Department of Education

### Summary

House Concurrent Resolution 234, House Draft 2, Senate Draft 1, of the 1995 legislative session directs the State Auditor to conduct a performance audit of the Department of Education's Comprehensive School Alienation Program, Alternative Learning Programs and Teen Pregnancy Programs. The audit was requested in response to legislative concern about how well the department's at-risk programs address the needs of at-risk students.

We found the Department of Education's management of the Comprehensive School Alienation Program (which includes alternative learning centers) and the Pregnant and Parenting Teen Program is weakened by the lack of a clear department mission. More specifically, we found the Office of Instructional Services has failed to provide districts and schools with clear objectives for these programs. As a result, program goals varied among sites and at times violated the department's and Board of Education's policies on graduation and equal access to education.

For example, one Leeward District high school used its Alternative Learning Center component of the Comprehensive School Alienation Program to award graduation diplomas to students with as few as six course credits. The Board of Education requires that 20 credits be earned. Other schools used the Comprehensive School Alienation Program to prepare high school students for adult education rather than high school graduation requirements. In 1994, one-third of the 2,262 individuals tested for the General Education Exam (GED)—an adult education exam used to measure high school diploma equivalency—were of high school age although the developer of the GED has reaffirmed the exam is intended for adult education and not for use with at-risk students. The Competency Based Program, another adult education program, continues to be used by various high schools despite recommendations of the Office of Instructional Services and principals of adult community schools that it be discontinued at the high schools.

Unclear program goals for the Pregnant and Parenting Teen Program resulted in the program ignoring the Board of Education policy encouraging the participation of teen fathers in the program. However, most schools in our sample that limited program access to females in 1994-95 informed us that male students would be included in these programs in 1995-96.

The department has also not sufficiently planned and budgeted for the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program by properly identifying either the target population for these programs or the programs' effectiveness. The department is unable to evaluate effectiveness because schools do not consistently identify all students eligible for at-risk services and what services are needed. This is further complicated by the lack of standardized reporting requirements and the schools' lack of consistent definitions of "mainstreaming," "attendance," "graduation," and "dropout." The department is unable to be accountable for the \$10 million expended for these programs in FY1994-95.

We also found on-site program monitoring for the Pregnant and Parenting Teen Program was limited to those receiving federal funds. Standards of accountability should not be lowered for programs receiving only state funds.

The department's allocation of positions for both programs is arbitrary. This results in unequal access to these programs. For example in FY1992-93, two districts did not receive the positions their student eligibility counts justified while the remaining five districts received more positions than justified by the eligibility counts. One district received twice the number of positions for which it was eligible.

We found that the Office of Instructional Services' current formula for allocating Comprehensive School Alienation Program funds creates perverse incentives because schools that are ineffective in decreasing the number of at-risk students are entitled to more funds. The Office of Instructional Services affirmed that it has not adhered to the formula; it has chosen to allocate funds among the districts on a status quo basis. The Office of Instructional Services should revise rather than ignore an allocation formula which is faulty, reactive, and inefficient over the long term.

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## Recommendations and Response

We recommend the department clearly state the mission of public education and that this mission drive the implementation of the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program. We also recommend the superintendent direct schools to discontinue the use of adult education programs at the high schools and to include males in the Pregnant and Parenting Teen Program. To address the need for better program planning and review, we recommend the Office of Instructional Services revise the programs' eligibility forms and evaluate programs annually. We also recommend the Office of Instructional Services work with the Office of Telecommunications and Technology to identify program information that should be maintained in the School Information System (SIS) to assist it in program planning and review. Finally, we recommend the Office of Instructional Services work with the Budget Branch to revise the allocation formula for the Comprehensive School Alienation Program.

The Board of Education and the Department of Education elected not to respond to our audit.

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## Foreword

The Hawaii State Legislature directed the State Auditor to conduct a performance audit of the Department of Education's Comprehensive School Alienation Program, Alternative Learning Programs, and Teen Pregnancy Programs through House Concurrent Resolution 234, House Draft 2, Senate Draft 1, of the 1995 legislative session. This audit was requested in response to legislative concern over how well the department's numerous at-risk programs address the educational needs of these students.

We wish to express our appreciation for the cooperation extended to us by the officials and staff of the Department of Education and other state and private agencies who assisted us in this review.

Marion M. Higa  
State Auditor





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# Chapter 1

## Introduction and Background

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The Legislature recognizes that public education today is faced with the challenge of addressing students' social and health problems while providing for their educational needs. Social and health problems can "alienate" students from the school and classroom environment, placing them "at-risk" of not completing their education. The Department of Education created numerous programs to address the problems of at-risk students. However, having numerous programs makes it difficult for the Legislature to determine whether funds are being used effectively and efficiently in addressing problems of at-risk students. Consequently, it is difficult for the Legislature to determine how best to appropriate funds for at-risk students. House Concurrent Resolution 234, House Draft 2, Senate Draft 1, of the 1995 legislative session, directs the State Auditor to address this concern by conducting a performance audit of the department's Comprehensive School Alienation Program (CSAP), Alternative Learning Programs and Teen Pregnancy Programs.

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### Background

Hawaii's compulsory attendance law, Section 298-9, Hawaii Revised Statutes (HRS), requires children to attend school if they are at least six years old or have not reached their eighteenth birthday by December 31 of any school year. In addition, equal access to education laws mandate that each student be provided with educational opportunities that best meet the individual's needs. These laws require the Department of Education to provide alternative programs for students with special educational needs that cannot be met by the "standard" or "mainstream" education program offered in schools. The wide range of special programs reflects the diversity of student needs. A variety of programs exist. These programs include those which address the needs of students who are physically and/or mentally challenged, to those who are gifted and talented, as well as those who for social and/or health reasons are at-risk of dropping out of school prior to graduating.

Programs for students at-risk of dropping out of school were created as early as 1961 by the Legislature. Act 125, Session Laws of Hawaii 1961, established a Special Motivation Program to address the increasing number of school student dropouts. This program provided at-risk students with guidance, tutorial services, and academic services. In September 1970, the Special Motivation Program was combined with several other programs, including the Neighborhood Youth Corps Program and the Vocational Technical Work-Study Program, into the Statewide Dropout Program. A year later in 1971, the Legislature

reorganized the Statewide Dropout Program into the Comprehensive School Alienation Program (CSAP). Today, programs for at-risk students continue to be addressed through the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program under the department's Office of Instructional Services.

***CSAP offers comprehensive services to a wide population***

The Comprehensive School Alienation Program functions as a "pull-out" program, one that removes students from the regular classroom and sometimes from the campus setting. This program provides students with alternative services to prevent or minimize their school alienation and reduce their chances of dropping out of school. The services include: (1) tutoring, (2) counseling, (3) on-campus special motivational classes, (4) on and off-campus alternative learning centers, and (5) work-study programs. Students may participate in the program on either a part-time or full-time basis. Students participating part-time may also receive instruction in the mainstream environment. To be eligible to participate in the program, students must meet at least two of the following departmental criteria:

- Failed two or more credits/courses;
- Behind in one or more grades;
- Failed the Hawaii State Test of Essential Competencies (HSTEC) or the alternative test, Essential Competencies Certification Center (ECCC);
- Accumulated ten or more days of truancy;
- Committed two or more class A or B offenses (unlawful criminal infractions);
- Committed three or more class C or D offenses (violation of department or school rules);
- Adjudicated (assigned a probation officer) by Family Court; and
- Is pregnant and/or is parenting.

In general, schools do not systematically review each student's records to determine eligibility for the Comprehensive School Alienation Program. Rather, students tend to be identified by teachers and counselors after the student's behavior and/or academic problems manifest themselves. Students are referred to the school's outreach counselor who then formally requests the school's screening committee to determine student eligibility for the program. Of the 22 schools we visited, the majority used counselors, Comprehensive School Alienation Program teaching staff, and school administrators for their screening committees. Generally, once the screening committee determines that a student is eligible, it will assign the student to an available Comprehensive School Alienation Program service which best meets the student's needs. Students meeting two or three of the qualifying criteria are considered moderately alienated, while

those meeting four or more of the criteria are categorized as severely alienated. A complete description of the referral process is described in Exhibit 1.1.

The screening committee does not limit students who are eligible for the Comprehensive School Alienation Program to the program's five components shown in Exhibit 1.1. Committees also refer students to alternatives which include the University of Hawaii Community Colleges' Career Opportunities Program and the National Guard's Youth Challenge Program.

***Pregnant and Parenting  
Teen Program offers  
specific services***

Students who are pregnant or parenting may qualify for and receive the Comprehensive School Alienation Program services. However, a specific program — the Pregnant and Parenting Teen Program — was established in 1991 for this target group. This program provides instructional services, prenatal and child care services, and parenting skills classes. The Pregnant and Parenting Teen Program is also administered by the department's Office of Instructional Services.

The department's first attempt to coordinate alternative education programs for pregnant students began in 1981 when the Honolulu District Office established the Booth Memorial School. The Booth Memorial School was the department's only coordinated program specifically addressing the needs of pregnant students during a ten year period. It was phased out in 1991.

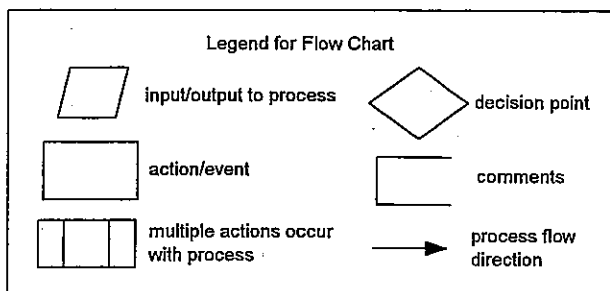
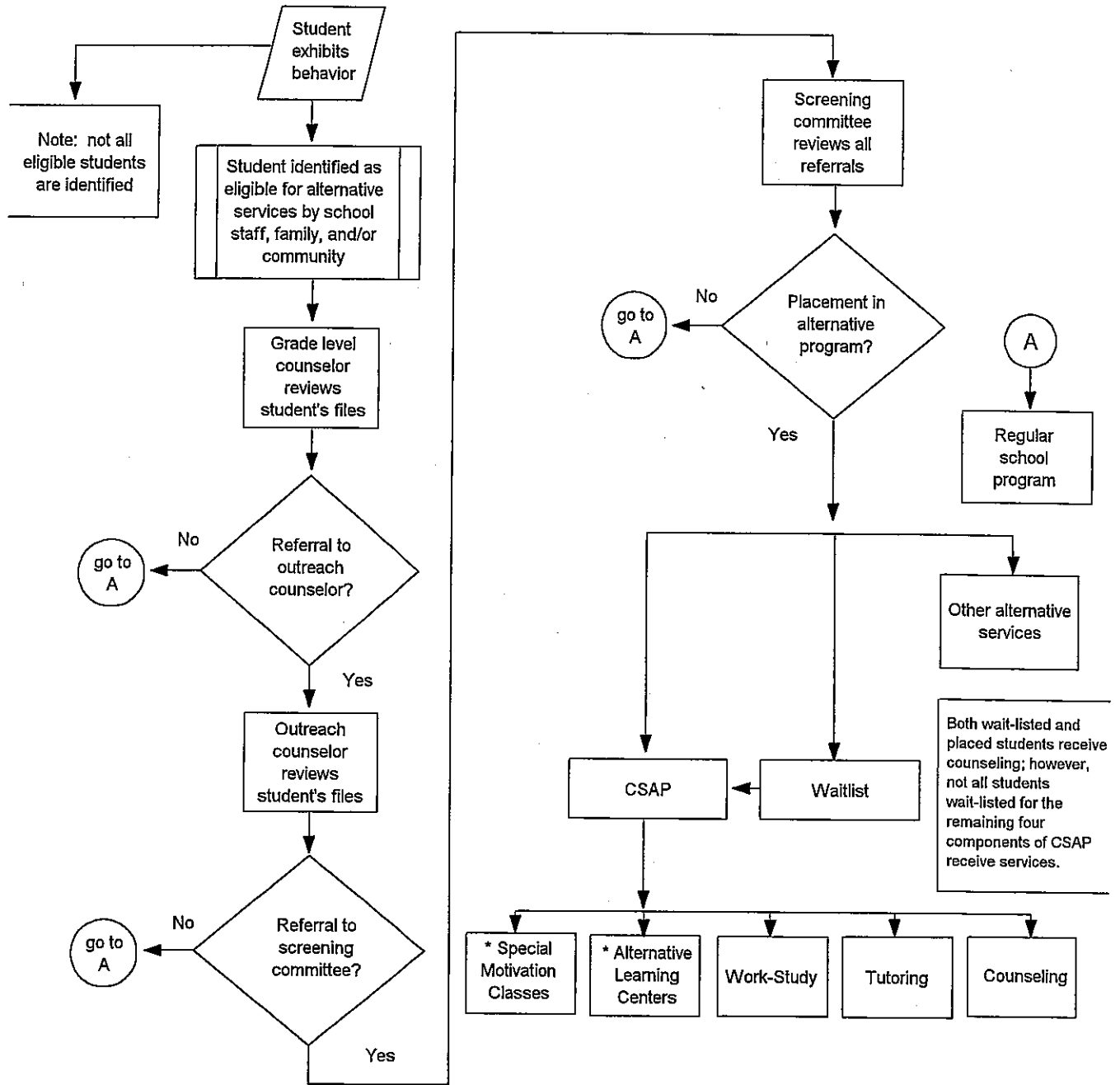
However, the Board of Education recognized the need for statewide services and subsequently adopted a policy requiring the department to encourage and help pregnant students and parenting male and female students to complete high school. The board required that courses relevant to pregnant and parenting teens be offered. The board also encouraged schools to offer child care and flexible academic schedules to pregnant and parenting teens.

***Program funding for at-risk students increased significantly***

The Legislature's support for at-risk student programs is evidenced by the programs' increased funding over the years. In Fiscal Biennium 1971-73, \$800,000 was appropriated for at-risk student programs. By FY1994-95, the Legislature had increased at-risk program funding to \$11 million, almost all of it in state general funds.

Of the \$11 million, the Comprehensive School Alienation Program was allocated \$9 million in state general funds in FY1994-95. The program allocation included \$8 million for 220 teaching and counseling positions. The remaining allocation provided funds for student stipends for work-study participants and other program costs. The \$9 million represents

**Exhibit 1.1  
CSAP Service Referral Process**



\* Special Motivation Classes (SMC) are on-campus options offering alienated students individualized and activity oriented instruction.

\* Alternative Learning Centers (ALC) are off-campus options for severely alienated students. ALCs provide instruction and schedules to meet the needs of individual students.

Note: This flowchart represents the general referral process. There are some variations, for example, at some schools, students are referred to either the SMC or ALC components before they are referred to work-study and tutoring services.

moneys budgeted and allocated in two ways: categorical and non-categorical. Categorical funds must be used exclusively for the program as identified in the budget. Non-categorical funds give the department more leeway; the department has the flexibility to use the funds as it determines. The Alternative Learning Centers, one of the five Comprehensive School Alienation Program components, is funded as a categorical program. The remaining four components are funded as non-categorical programs.

The Pregnant and Parenting Teen Program receives state and federal funds. In FY1994-95, the program spent \$656,728 or 73 percent of its \$897,552, from state general funds. The remaining 27 percent of the expenditures came from federal funds. The sources of federal funds are the Vocational and Applied Technology Education Single parent Program of the Carl D. Perkins Act of 1990 and the Child Care and Development Block Grant. The Pregnant and Parenting Teen Program uses federal funds for teaching positions, the provision of child care, and program instructional materials.

Exhibit 1.2 displays the funds expended for alternative education programs during FY1994-95 and the sources of the funding. The exhibit represents programs that specifically target and service students at-risk of dropping out of school. The exhibit includes \$1 million for other department at-risk programs, although we were not asked to audit these programs. These programs include 1) the Career Opportunities Program, which targets students who meet the Comprehensive School Alienation Program eligibility criteria; 2) the Comprehensive Elementary School Counseling Project, which focuses on early intervention services for alienation in the Honolulu District; and 3) the Comprehensive Drop-Out Prevention Program. Additional Programs to meet the needs of pregnant and parenting teens are also included in other expenditures made by the department for at-risk programs. These targeted programs spent \$1.0 million in FY1994-95.

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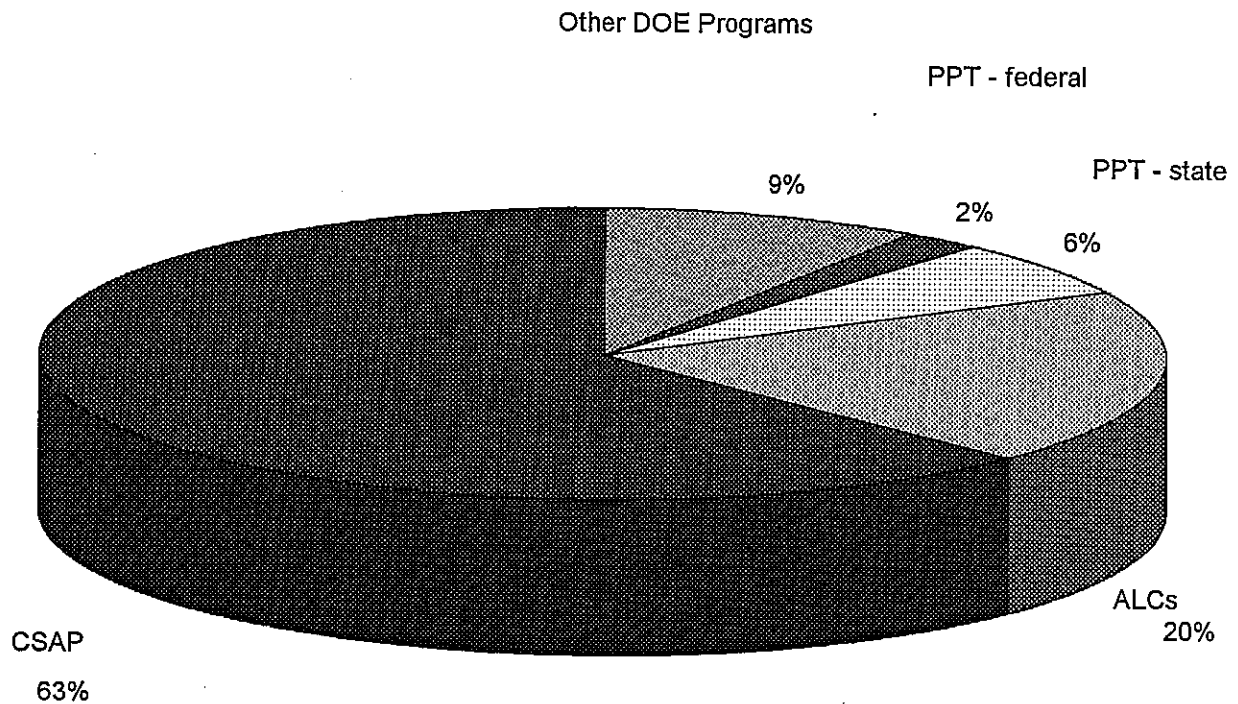
## Objectives

The objectives of this audit were to:

1. Identify the objectives of the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program, and determine whether the Department of Education assesses the adequacy of these programs in meeting the needs of students defined as at-risk by the department.
2. Determine how the department identifies the type and level of services needed through the Comprehensive School Alienation

**Exhibit 1.2**

**DOE Expenditures for At-risk Programs, by Percent of Total Expenditures, FY1994-95**



Other DOE Programs (State funds)	\$1,008,895
PPT (Federal funds)	\$240,824
PPT (State funds)	\$656,728
ALCs (State funds)	\$2,137,727*
CSAP (State funds)	\$6,841,425*

Total State Funds:	\$10,644,775
Total Federal Funds:	\$ 240,824
Total State and Federal Funds:	\$10,885,599

\* Note: ALCs are part of the CSAP program, but ALCs are funded separately from CSAP.

Program and Pregnant and Parenting Teen Program, and assess whether the department budgets for these programs in accordance with identified student needs.

3. Make recommendations as appropriate.

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## Scope and Methodology

In performing this audit, we reviewed the department's mission statements and Foundation Program Objectives which serve as the basis for curriculum and instruction in Hawaii's public schools. We also reviewed the goals and objectives of the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program. We interviewed DOE officials and officials from other local and national state and private agencies that provide services to students at-risk of dropping out of school. We reviewed allocations for the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program, and program evaluation reports written by the Department of Education and private organizations. We also reviewed and tested the reliability of the data submitted by schools that measure program performance with indicators established by the Department of Education.

We surveyed all public intermediate and high schools to identify programs providing services that directly target at-risk students and reviewed the role of the Office of Instructional Services and the district offices in planning, evaluating, and monitoring the programs.

Our work was performed from May 1995 through October 1995 in accordance with generally accepted government auditing standards.





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# Chapter 2

## Findings and Recommendations

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This chapter presents our findings and recommendations relating to the effectiveness and funding of the Department of Education's Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program. The department has not sufficiently planned and reviewed these programs, resulting in the department's limited accountability for its \$10 million program expenditure. The department's inadequate program planning and evaluation of the Comprehensive School Alienation Program has fostered the misuse of this program by some schools to graduate students who do not meet the Board of Education's graduations standards. We conclude that the department can improve its accountability by developing clear goals for alternative education programs and by determining program effectiveness.

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### Summary of Findings

1. The Department of Education's weak management of the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program has resulted in programs that do not adhere to the department's and Board of Education's graduation and equal access to education policies.
2. The Office of Instructional Services expended \$10 million for the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program without appropriate program planning and evaluation of the program's effectiveness to justify its expenditures.
3. The Department of Education allocates resources for the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program arbitrarily, resulting in unequal access to alternative education programs.

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### The Department Of Education's Management of CSAP and the Pregnant and Parenting Teen Program is Weak

The Department of Education does not manage the Comprehensive School Alienation Program (CSAP) and the Pregnant and Parenting Teen Program to ensure that these programs are implemented to achieve a cohesive goal. We found that the Department of Education does not have a clear mission to effectively guide these programs. In addition, the Office of Instructional Services has not fulfilled its responsibilities as the programs' administrator. The office has not developed clear program objectives and held schools accountable for meeting those objectives. Rather, the office has limited its role to that of a conduit for program

funding under the guise of flexibility granted to schools through School Community Based Management (SCBM). The office fails to understand that SCBM does not supplant its responsibility for directing the programs. The office must still ensure that schools meet uniform program goals and outcomes. The lack of a clear mission for the alternative education programs, coupled with the office's belief that it is not responsible for guiding these programs, has resulted in the implementation of programs that conflict with department and Board of Education policies and equal access to education.

***Department of  
Education's mission  
statements lack clarity***

A clear mission is needed to guide the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program. However, the Department of Education's failure to provide direction for these programs through a clear department mission has contributed to the vagueness of the purpose of these programs.

We found that the department has several mission statements that vary in clarity and direction. For example, the Board of Education defined the mission of the public schools in the 1980s as promoting "democracy's beliefs in the worth of all persons and the well-being of society." This vague mission sharply contrasts the superintendent's mission: the department is to assure that all students succeed by focusing on literacy. The Office of Instructional Services has embraced neither the superintendent's nor the Board of Education's missions. Instead, the office's mission focuses on the development of relevant curriculum and sound instructional and support services as the means for achieving equity and excellence in education. The range of these missions does not provide program administrators with sufficient clarity on the goals of public education.

However, despite the department's shortcomings in clearly identifying its primary mission, it is reasonable to expect that the very structure of public education, grades kindergarten through twelve, succumbs to a desired outcome. Although the Board of Education has established the parameters for this outcome known as graduation, the department remains unclear on what graduation means. The department's confusion is indicated in its diverse mission statements. Ideally the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program should be alternatives to mainstream education and prepare students for meeting the board's graduation standards. However, the lack of clear department goals has fostered the implementation of the Comprehensive School Alienation Program by some schools in a manner which lowers the board's standards for graduation. The Office of Instructional Services, the curriculum arm of the department, is supposed to direct the implementations of at-risk programs.

***Office of Instructional Services fails to provide schools with clear program objectives***

The Office of Instructional Services is responsible for administering the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program. Being responsible means in part that the office is to develop clear program objectives that identify desired student outcomes resulting from implementation of these programs. We found that the office has not provided clear objectives for either program. In the case of the Pregnant and Parenting Teen Program, the program's objectives are derived from various federal funding sources. Consequently, the objectives vary among schools and at times even within schools. With no standardized program outcomes, results will vary and schools cannot be held accountable.

We also found that the Office of Instructional Services has not provided schools with clear program objectives for the Comprehensive School Alienation Program. Although the Office of Instructional Services has issued program guidelines, the three levels of program administration—the Office of Instructional Services, district offices, and schools—are not clear which version, if any, governs the program. The Office of Instructional Services issued the Comprehensive School Alienation Program guidelines in 1986 and later replaced them with a draft guideline in 1992 without formally withdrawing the 1986 version. The office is confused about the status of the guidelines. The Office of Instructional Services contends that the schools are given autonomy under School Community Based Management and do not have to follow the program guidelines, yet the office also sees its role as that of ensuring schools do not bend program rules. The result of this confusion finds schools and districts referring to and administering different program guidelines. One district continues to use the 1986 guidelines despite the office's verbal directive that those guidelines are no longer in effect. This district's continued use of earlier guidelines is due to the office's failure to provide new program directives. As a result of this lack of direction, the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program have been implemented with inconsistent goals.

***Non-cohesive CSAP goals conflict with graduation standards***

Schools implement programs according to their individual school needs; however, the program outcomes should be consistent among all schools and with the department's mission. In the absence of a clear mission, the Comprehensive School Alienation Program is implemented to achieve various purposes including those that conflict with the Board of Education's graduation standards.

The Board of Education established that at the minimum, students receiving high school diplomas from Hawaii's public high schools must earn 20 credits (22 credits beginning with the class of 1997) and pass the Hawaii State Test of Essential Competencies (HSTEC). The HSTEC is used to measure whether students have grasped the objectives of the department's curriculum.

However, we found that the programs implemented at the 22 schools we visited targeted various students and were not consistent in targeting and in directing students towards these established graduation standards. For example, some schools give priority to ninth graders and new students in the Comprehensive School Alienation Program referral process. This is to help the targeted students assimilate into their new high school environment and keep them reasonably current in their graduation credit requirements.

In contrast, other schools target older students who are unable to graduate due to a lack of credits. To meet the needs of these older students, several schools in the Leeward District have broadened the scope of the Comprehensive School Alienation Program to include preparing high school students for the General Education Development Tests (GED) and the Competency Based Exam administered by the adult community schools. This is of concern because the GED and Competency Based Exam were intended to provide adults with the opportunity to earn a high school diploma equivalent.

### **DOE's questionable use of adult education programs for credit deficient students**

The department's use of the GED and the Competency Based Program for Comprehensive School Alienation Program students who are credit deficient is questionable. These programs were developed for adult education and were not intended to be used in public high schools. The GED is a national test which measures an adult's knowledge of the high school curriculum. The Competency Based Program was adopted from Texas and consists of both an exam and a structured course curriculum. The exam measures the literacy and life skills adults need to function in society. To be eligible to sit for either of the two exams, an individual must generally be at least seventeen years old and no longer required to attend high school. Students who prepare for these exams through the Comprehensive School Alienation Program must drop out of school before they are eligible to take the GED or final Mastery Competency Based Exam from the adult community schools. In this sense, the Comprehensive School Alienation Program is used as a holding program to meet the compulsory school attendance law.

Although the GED exam is intended for adults, we found that one-third of the 2,262 individuals tested during 1994 were of high school age. This is of concern because in 1992, the developer of the GED exam, the General Education Development Testing Service, reaffirmed that the GED program was intended for adult education and not for at-risk students.

In addition, the DOE itself is concerned whether the Competency Based Program meets department standards in measuring student achievement. The Office of Instructional Services was to evaluate and compare the Competency Based Program to the HSTEC; however, department officials do not know if the evaluation was ever completed. Moreover, both the Office of Instructional Services and the principals of the adult community schools recommended to the superintendent that the Competency Based Program be discontinued at the high schools. Despite these concerns, schools continue to use the Competency Based Program and to prepare students for the GED exam.

Furthermore, the use of adult education programs by the high schools for at-risk students distorts the true cost of both adult education and alternative education programs. When the Comprehensive School Alienation Program funds and program slots are used to prepare students for adult education programs, fewer resources are available to prepare students to meet regular high school graduation requirements. This also makes the costs of adult education appear to be lower because the costs do not include the portion of the Comprehensive School Alienation Program funds used to prepare students specifically for adult education alternatives.

### **Leeward alternative learning center's graduates fail to meet Board's graduation requirements**

Students participating in an Alternative Learning Center at a Leeward District high school are awarded high school diplomas although they fail to meet the Board of Education's graduation requirements. The Alternative Learning Center at the high school uses only the Competency Based Program and awards high school diplomas to students who successfully complete the program and pass the HSTEC exam. Students with as few as six credits have graduated from this school, although they failed to meet the board's 20 credit graduation requirement.

A counselor at this Leeward high school maintains that students are awarded diplomas without earning credits because the one-year program is equivalent to a high school education. However, this practice violates the superintendent's directive that disallows the use of the Competency Based Program to award high school diplomas. In a 1993 memorandum to all district superintendents, the superintendent stipulated that school principals must determine, document, and award credit equivalency to match the current high school graduation requirements for schools using the Competency Based Program. This high school's principal has not met these requirements. A former deputy district superintendent of the Leeward District informed us that the district office had endorsed the program. However, both the high school and district office were unable to provide us with any written approval for the program. Graduation

policies were not the only ones violated by alternative education programs; we also found that the Pregnant and Parenting Teen Program violated the Board's policy on equal access to the program.

***Pregnant and Parenting Teen Program violated equal access to education policy***

As another result of unclear program goals, the Pregnant and Parenting Teen Program targeted different groups of students at the program sites we visited. For example, some schools excluded males from their programs because developing teen fathers' parenting skills was not seen as a program objective. However, the Board of Education's policy that mandates the establishment of programs for pregnant and parenting teens encourages schools to also include teen fathers in these programs. We found that several schools ignored board policy encouraging the participation of teen fathers and limited access to their programs to females.

Several schools we visited stated that the Pregnant and Parenting Teen Program was located off-campus and therefore was limited to females. However, we found this reason insufficient. Most schools in our sample have addressed this issue of unequal access by planning to include teen fathers in their programs during the 1995-96 school year.

However, we note that the Pregnant and Parenting Teen Program of one school in our sample continues to remain off-campus and to limit its program to female students. The program coordinator at this Leeward school is concerned that students within the program are denied equal access to education because of the program's off-campus location. The coordinator is concerned that participating students do not have access to campus resources. The Office of Instructional Services has also voiced concern over unequal access to resources and encouraged the school to move its program on-campus. Several off-campus programs have already moved their programs on-campus for the 1995-96 school year.

The Office of Instructional Services should monitor all Pregnant and Parenting Teen Programs to ensure equality of access for students eligible for the program. The department's weak management of the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program is reflected in its inconsistent program goals, which also creates problems in trying to assess the effectiveness of these programs.

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**Effectiveness of the At-Risk Programs Unknown by the Department of Education**

The Department of Education expended \$10 million in FY1994-95 for the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program without identifying all eligible students, program needs for those students, and the effectiveness of the programs for those students actually served. The department has not sufficiently met the requirements for proper program planning and budgeting (PPB) as a result of the inadequate management. PPB was adopted by the State

in 1970 to promote rational budgeting. PPB focuses on planning and measuring by program objectives. For at-risk programs, this would mean identifying the target population and measuring effectiveness in delivering at-risk services. Although the department has developed a computerized Student Information System to both identify and measure the effectiveness of programs, we found that the Student Information System does not identify students eligible for the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program. In addition, the Student Information System is not designed and programmed to determine these programs' effectiveness.

***Office of Instructional Services' identification of program needs is insufficient to effectively service students***

The Office of Instructional Services does not have clear policies and procedures to ensure that student eligibility and service needs for at-risk programs are identified. Consequently, the Office of Instructional Services is unable to determine how to best distribute the \$10 million that the Legislature appropriated for the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program for FY1994-95. The Office of Instructional Services continues to distribute resources as it did in the past and school screening committees continue to refer students to the Comprehensive School Alienation Program services by availability and not necessarily by student need. In addition, the Office of Instructional Services is unable to determine the effectiveness of these programs in meeting student needs.

**Not all eligible students are identified**

The Office of Instructional Services requires all schools to complete a student eligibility and placement form for the Comprehensive School Alienation Program. The form requires schools to identify all students eligible for services and to indicate the qualifying criteria for each student. The office developed the eligibility and placement list form to determine district needs when allocating funds for the program. Likewise, the office requires schools to identify all pregnant and parenting students on an annual data survey form. However, we found that schools do not identify all students who are eligible for the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program. If all eligible students are not identified, the distribution of funds can be arbitrary and access to program services can be unequal.

During our visits to 22 schools, we found only four schools attempted to identify all students eligible for the Comprehensive School Alienation Program services through a comprehensive file review of the entire student body. Many schools informed us that they identify only those students whose eligibility behaviors are noticed by teachers and counselors. In addition, two schools we visited included only those



students who *received* services as opposed to all *eligible* students on their student eligibility and placement forms. We also found that two schools receiving funds for the Pregnant and Parenting Teen Program did not identify any eligible students on the eligibility form.

Schools do not identify all eligible students for two reasons. First, some schools informed us that the department does not have adequate resources to meet the needs of all students who may be eligible and that it is too time consuming to identify and document service needs for all eligible students. Secondly, they also informed us that the number of positions that they have been allocated in the past generally remains constant regardless of fluctuations in student counts. One district office reported that the Office of Instructional Services has encouraged the district to make a greater effort to identify all students who meet the Comprehensive School Alienation Program eligibility criteria and thereby increase their eligibility counts. Despite these notifications, schools do not identify all eligible students when completing the student eligibility identification forms.

### **Student service needs are unknown**

The Department of Education has made little effort to identify and track the service needs of students eligible for alternative education. In addition to not identifying all students eligible for services, the department's Office of Instructional Services does not require schools to record the service needs for those students who have been identified. The Comprehensive School Alienation Program student placement and referral form requires schools to identify the service provided to participants; however, the form does not list services actually needed by students. This lack of complete information results in the Department of Education being unable to determine how well it is meeting student needs.

We found that most districts service only 30 percent of the students whom they identify as eligible for services. We could not determine whether these students' needs were being met because the Office of Instructional Services does not require schools to report that information. Similarly, there is no indication of what the service needs are for the remaining 70 percent of the students identified as eligible for services. Of the 22 schools we visited, only 1 school actually identified service needs for all students as well as service placement for those receiving services. However, these records were kept at the school and were not used by the state and district offices for program planning and budgeting. The Office of Instructional Services also does not have records indicating the number of students needing child care, instructional, and prenatal services for their Pregnant and Parenting Teen Program.

The Office of Instructional Services should revise its eligibility and placement forms to include service needs and placement of all students. This information can be used to identify the greatest service needs and to

plan program services that will meet the needs of schools most cost effectively. For example, schools can decide on the cost effectiveness of providing more alternative learning centers, special motivation classes, work-study opportunities, or outreach counselor services. A student needs assessment is crucial in determining the department's efficiency in meeting student needs and in making program adjustments based on documented needs. The office also needs information that identifies how well the current at-risk programs meet the needs of its targeted population.

### ***Program effectiveness undetermined***

The Office of Instructional Services has not adequately monitored the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program to determine program effectiveness. On-site monitoring of these programs has either stopped completely or is sporadic at best. We also found that the office has recognized that schools report data for performance measures inconsistently. This results in data that is meaningless and of little use to the office. Although the office recognizes that the data is flawed, the office has expended very little effort to resolve the inconsistent data reporting. As a result, the office has no clear indication of how well schools have met performance measures established for these programs.

### **On-site program monitoring is sporadic**

The Office of Instructional Services' program guidelines for the Comprehensive School Alienation Program require the office to monitor, evaluate, and submit written reports of school programs. In addition, the Carl D. Perkins Act of 1990 requires evaluations from states receiving federal funds from the Pregnant Teens and Adolescent Parents Vocational Development Grant. We found that the office has not monitored and evaluated school programs sufficiently. The office ceased its on-site Comprehensive School Alienation Program evaluations in 1993. Furthermore, we found that the office's evaluation of the Pregnant and Parenting Teen Program is fragmented and limits on-site program monitoring to recipients of Carl D. Perkins Act funds.

The fragmented evaluation of the Pregnant and Parenting Teen Program is of concern because there is no assurance that other schools not receiving federal grant funds are meeting program objectives. The Office of Instructional Services should ensure that all schools are accountable for state funds as well as federal funds. Limiting program review to federal fund recipients is distressing because it indicates that the department believes it need not be held accountable for the expenditure of state funds. The standard of accountability for program expenditures should not be lowered for state funds.

In addition to the lack of program review and evaluation at the state level, we generally found that districts and schools have not adequately evaluated their programs. For example, about half of the school districts do not conduct on-site program monitoring. Honolulu District is the only district that conducts on-site monitoring and generates evaluation reports. Furthermore, although 35 percent of the schools we surveyed reported that they conduct program evaluations as well as complete evaluation reports, none of the 22 schools we visited produced a written evaluation report. Some of the schools simply referred to the data forms indicating program effectiveness when asked how they evaluated the Comprehensive School Alienation Program.

### **Data is flawed**

The Office of Instructional Services requires schools to submit data that indicates how well districts and schools meet program performance measures for the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program. However, schools report non-uniform data that is flawed and of little use for determining program effectiveness. Of greater concern is the department's continued use of the data despite the Office of Instructional Services' recognition that the data is flawed. We also found that the office does not provide follow-up and direction to schools and districts that do not meet the office's own performance expectations.

The department has written instructions for the completion of the Comprehensive School Alienation Program data forms that should indicate how well schools meet the program objectives. However, the instructions do not clearly define the reporting categories nor do the program guidelines ensure uniformity in reporting data. Also, the Office of Instructional Services has not provided written instructions to assist schools in completing the Carl Perkins Data Form, which is used to measure how well grant schools meet program objectives for the Pregnant and Parenting Teen Program. Although schools informed us that districts hold workshops to provide school level staff with instruction on how to complete these data forms, we found that the schools continue to lack the direction needed to report data uniformly.

Lack of uniform reporting shows up in several instances. Schools had differing definitions for "mainstreaming," "attendance," "graduation," and "dropout rates." For example, several schools count students who do not show up for class as "dropouts" although these students do not officially drop out of school. A Honolulu District school created an artificial "class" for students who do not show up for the Comprehensive School Alienation Program and counted these students as "mainstreamed" in order to open slots for other eligible students. Some schools count students who *transfer to other schools* as mainstreamed. We also found schools reported attendance rates variously.

The department does not have a uniform system for counting school attendance rates. Schools' standards for excused and unexcused absences vary. These variations result in attendance rates that are not comparable. For example, one instructor for the Pregnant and Parenting Teen Program informed us that the Office of Instructional Services directed the instructor to use the school's criteria in reporting attendance rates on the program evaluation survey form. Because absenteeism criteria differs among schools, the attendance rates of schools will vary and should not be compared. Collecting attendance data based on inconsistent criteria becomes a meaningless exercise.

In addition to inconsistent and varied data reporting, we also found that schools use projections when completing the data forms that measure programs' performance. Schools use projections because the forms are due to the Office of Instructional Services prior to the end of the school year. We found projections to be inaccurate. For example, one school's projection of mainstreamed students was inaccurate by 42 percent.

The Office of Instructional Services informed us that it is aware of the errors in reported data; however, it has made limited efforts to standardize reporting requirements and to correct erroneous Comprehensive School Alienation Program data reports. Furthermore, a Comprehensive School Alienation Program evaluation conducted by a private contractor for SY1988-89 and SY1989-90 found that schools submitted inaccurate data due to misinterpretations of instructions. In addition, in July 1995, a federally funded evaluation report of Pregnant and Parenting Teen Program sites receiving Carl D. Perkins funds also found that schools report performance measures inconsistently.

Despite these reported discrepancies, the Office of Instructional Services informed us that the data collected is used for program planning. We find this bothersome since the office is well aware of the data's limitations. Furthermore, the office has recognized the need for good program data for the purpose of assessing program needs.

### **Performance measures unrelated to program effectiveness**

The Office of Instructional Services developed performance measures for the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program. However, the schools consider the measures inadequate. Performance indicators include attendance and graduation rates, the number of students who drop out of school and the number of students who return to the regular classroom. These performance measures do not adequately measure student achievement.

For example, mainstreaming for those students who do not function well in the mainstream environment may not always be an appropriate goal. Similarly, the Pregnant and Parenting Teen Program requires schools

receiving federal grant funds to enroll all program participants in a vocational education class. Schools informed us that this goal is unrealistic for several reasons: 1) off-campus Pregnant and Parenting Teen Program sites do not have access to vocational education courses, 2) not all students can fit a vocational education course into their schedule, and 3) not all students meet the pre-requisite requirements for vocational education.

The Honolulu District Office found the current performance measures are insufficient in identifying student performance. The office uses national standardized tests as alternatives for measuring student performance. We reviewed the pre- and post-program test results for students enrolled in the Comprehensive School Alienation Program and found that in certain schools, student performance consistently improved with program completion. However, we found that the office's report has not been utilized to its potential because schools showing success rates have not been promoted as models for other schools in the district.

Although the Department of Education has tools for building more effective evaluation instruments such as the Honolulu District Office's data reports, it fails to use them. It also fails to utilize existing resources such as the electronic School Information System (SIS).

### **SIS fails to meet its purpose**

In response to the need for better program information, the department planned and implemented a computerized Student Information and Program Management System (SIPMS). The department intended that SIPMS be used to identify student service needs, match students to appropriate education programs, and evaluate the effectiveness of the department's programs. The department changed the name of the SIPMS to the Student Information System and more recently to the School Information System. Therefore, the current School Information System was intended to provide program planners with reliable program information. However, the Office of Information and Telecommunications has informed us that the School Information System has fallen short of this goal and is presently incapable of identifying students eligible for the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program and for measuring the effectiveness of these programs.

The department claims financial constraints limit what could realistically be achieved with the School Information System. As a result, the current system's ability to match students with programs is limited to: 1) identifying potential candidates for the Students of Limited English Proficiency Program (SLEP); and 2) identifying all SLEP and special education students. The Student Information System is unable to identify

students who meet the Comprehensive School Alienation Program criteria and who receive the services from this program and Pregnant and Parenting Teen Program services. Therefore, the Comprehensive School Alienation Program students and pregnant and parenting teens who transfer to new schools must be manually re-screened for services. There is no assurance that all eligible students will be identified since the manual referral and screening process does not actively search for eligible students.

Both the Office of Instructional Services and the Office of Information and Telecommunication Services acknowledge that using the Student Information System to identify students eligible for the Comprehensive School Alienation Program will give the department a clearer indication of program needs. In 1990, a department study recommended that the information needed for effective program evaluation be determined and appropriate revisions, including standardization of data forms, be made. However, the Office of Instructional Services has not addressed this recommendation. The Office of Instructional Services should work with the Office of Information and Telecommunication Services to identify program information needs. In addition, the department should determine the measures it will use to determine the effectiveness of all programs. Program measures should be consistent across programs and clearly defined to ensure uniformity in reporting data. The Office of Instructional Services should develop a timeframe for including the program information in the School Information System to ensure that the system fulfills its purpose.

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### **The Department of Education's Allocations of Positions for CSAP and the Pregnant and Parenting Teen Program Create Unequal Access**

The Department of Education's policy is to allocate school level positions based on service needs and the equitable distribution of resources. The department created allocation formulas to distribute resources to programs including the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program. However, we found that the department has not used the formulas for these two programs. Instead the department allocates positions arbitrarily. Consequently, access to these programs is unequal. Furthermore, if the department had applied its Comprehensive School Alienation Program formula to allocate positions, it would have rewarded schools that were the least effective in preventing school alienation.

#### ***Arbitrary allocations of positions affect programs***

The Office of Instructional Services determines service and budgeting needs for the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program by requiring schools and districts to submit annual student eligibility counts. However, we found the department's allocations are arbitrary and not related to those student eligibility

counts. We applied the formulas used for allocating funds to each of the seven school districts' student eligibility counts and found the Department of Education has not allocated positions for the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program in a manner that is consistent with identified service needs. We found that district positions remained fairly constant regardless of fluctuations in needs.

Exhibits 2.1a and 2.1b show the fairly constant distribution of Special Motivation Class (SMC) positions which contrasts with a variation in program needs among the seven school districts. The exhibit shows that Central and Honolulu Districts received fewer teaching positions than were justified during FY1992-93 in contrast to the remaining five districts. These five districts received more positions than they were entitled to according to the formula. Further evidence of inconsistent allocations is shown in the number of positions allocated to the Leeward District during FY1992-93 and FY1993-94. Leeward District received twice the number of positions than the student eligibility service needs counts justified.

Exhibits 2.1a and 2.1b also indicate that the department failed to justify Comprehensive School Alienation Program expenditures made during FY1993-94. Each of the seven school districts received more Comprehensive School Alienation Program teaching positions for Special Motivation Classes (SMC) than justified by service need eligibility counts for FY1993-94. The districts received a total of 31 unjustified positions, nearly one-third of the total SMC teacher allocations, for the Comprehensive School Alienation Program. This is of concern because the department should not allocate positions that are not justified. The failure of the department to justify these position allocations indicates that positions are allocated arbitrarily. In addition, the failure of the department to follow its own criteria for allocating funds confuses districts. For example, one district resource teacher informed us that the district is not sure how the state allocates funds to the districts.

The 21 teaching position allocations for the Pregnant and Parenting Teen Program are also arbitrarily made. When we applied the Office of Instructional Services funding formula to the program eligible counts, we found that two schools were allotted unjustifiable teaching positions. In contrast, a Leeward high school that was eligible for 1.5 positions was not allotted any position. The Office of Instructional Services informed us that this school uses Comprehensive School Alienation Program funds for its Pregnant and Parenting Teen Program and therefore did not receive any Pregnant and Parenting Teen Program funds. This rationale is unjustified because all schools have the opportunity to use Comprehensive School Alienation Program allocations for the Pregnant and Parenting Teen Program since the Comprehensive School Alienation Program is not

Exhibit 2.1a

Comparison of Actual Allocations of CSAP SMC Teaching Positions to Positions Based on Identified Needs, FY1992-93 through FY1994-95

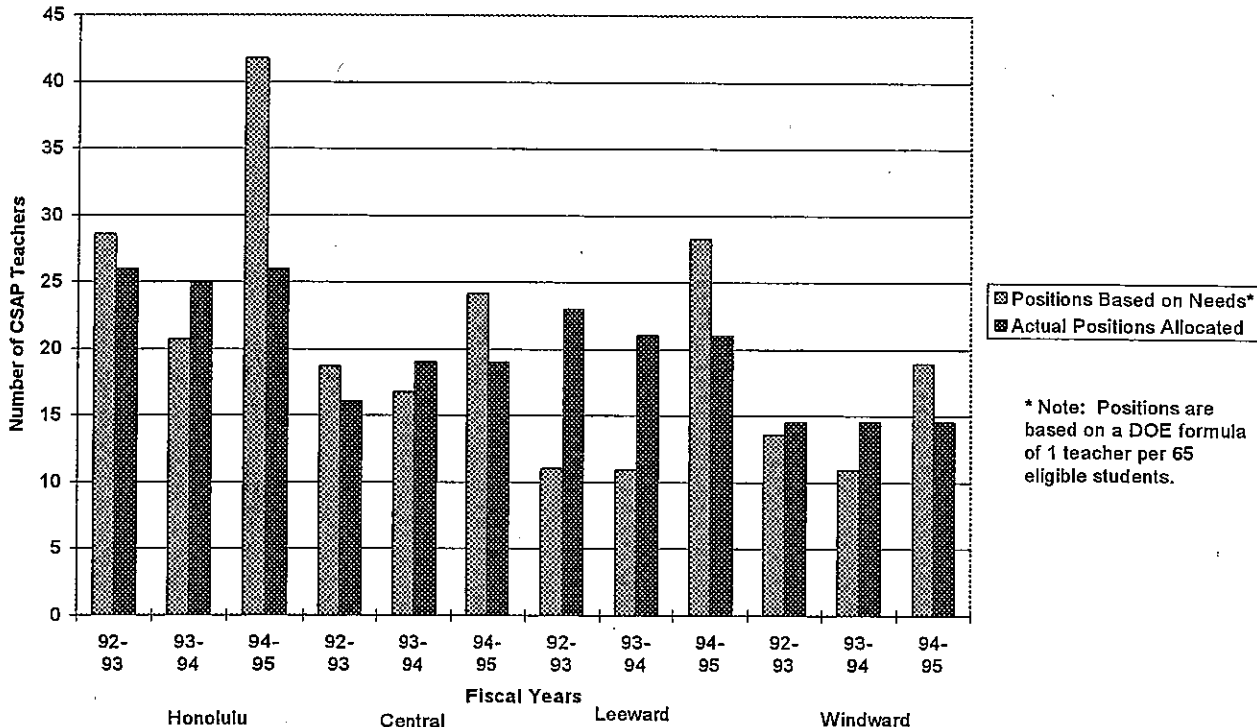
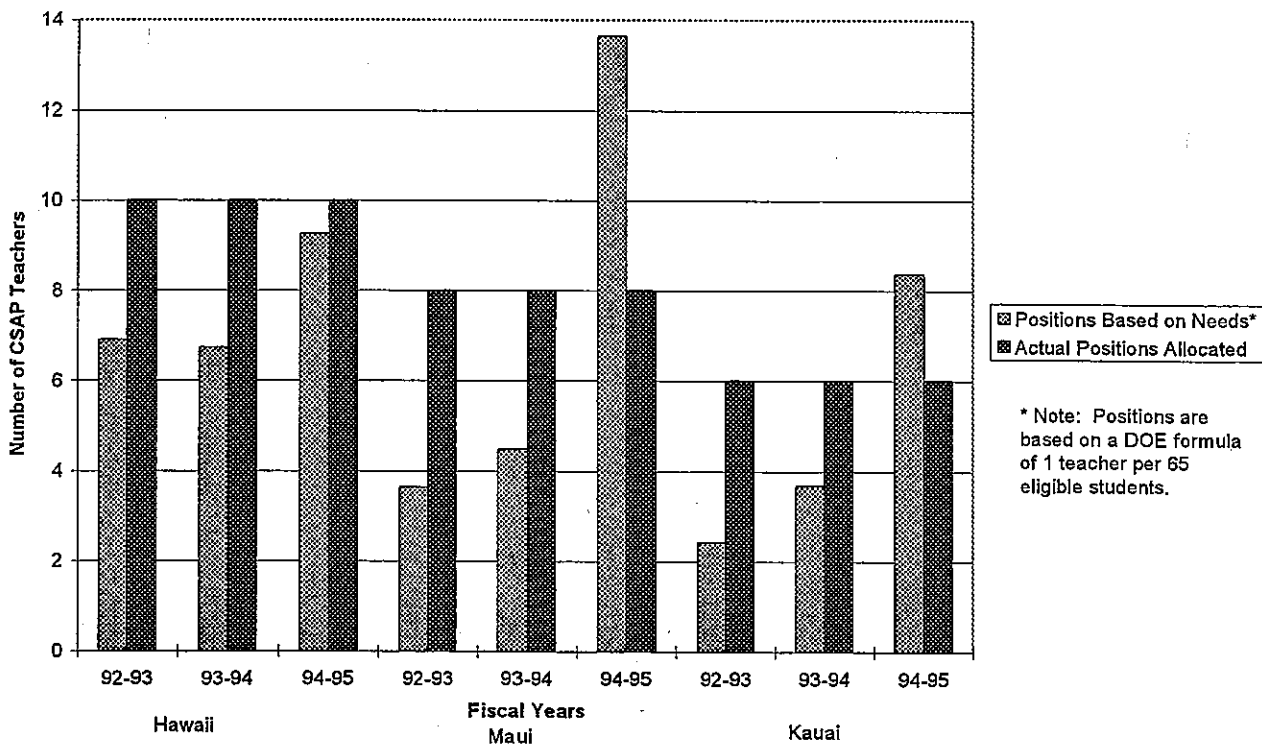


Exhibit 2.1b

Comparison of Actual Allocations of CSAP SMC Teaching Positions to Positions Based on Identified Needs, FY1992-93 through FY1994-95





categorically funded. Furthermore, this rationale diverts funding from the Comprehensive School Alienation Program; as a result, the Comprehensive School Alienation Program serves fewer students.

Arbitrary funding for the two programs translates into unequal access to alternative educational programs. Students in districts with fewer positions than they are entitled to by formula have fewer opportunities to receive program services. The Office of Instructional Services is aware of the funding inconsistencies but has done nothing to correct them. The department should review its procedures for allocating funds.

***CSAP funding formula  
creates perverse  
incentives***

The current formula for allocating funds does not encourage schools to be efficient in preventing the need for alienation program services. Rather, the allocation formula encourages schools to keep their status quo and to increase funding levels by increasing the alienated student population. According to the department, the distribution of teaching positions for Special Motivation Classes, Alternative Learning Centers, and the Pregnant and Parenting Teen Program are subject to formulas that allocate positions based on the number of eligible students. For the fiscal year 1995-96, the formula allots 1 teaching position for every 18 students eligible for special motivation classes. The ratio was previously 1 teacher for every 65 students. We note that the department had no rationale for the new formula. Moreover, this method creates perverse incentives because schools receive more funds if they are unsuccessful in decreasing the number of at-risk students.

The Office of Instructional Services informed us it has not adhered to the Comprehensive School Alienation Program allocation formulas for the past ten years. The decision to maintain the status quo and to disregard the allocation formula indicates that the office recognized that the current allocation formula may not be justified. A 1993 Office of Instructional Services memo expressed concern that the reallocation of positions based on the formula would result in cutting positions from districts that the office believed were more efficient in serving students. The memo suggested that the department's budget branch be informed of Office of Instructional Services' decision to maintain the status quo. According to the office, two districts serving 60 percent of the students identified as eligible for services would lose positions to three districts that were servicing fewer than 30 percent of the students eligible for services. Although the office has recognized that the Comprehensive School Alienation Program formula is faulty it has chosen to disregard the formula rather than change it. However, the formula that may be faulty should be revised and not ignored.

We recognize the department's decision to maintain the status quo in allocating positions was an effort to reward schools which serve a higher percentage of students identified as needing services. The Maui District

Office allocates funds to schools in a similar manner. The office allocates funds in proportion to the average number of students identified as eligible and the percentage of students served. However, we caution the department and districts in allocating funds in this manner because the number of students served does not take into consideration how well the schools and districts meet service needs. For example, one Honolulu District high school informed us that it is considering limiting the number of services provided to each student in order to increase the number of students receiving services at the school. Another school has already capped the services a student may receive.

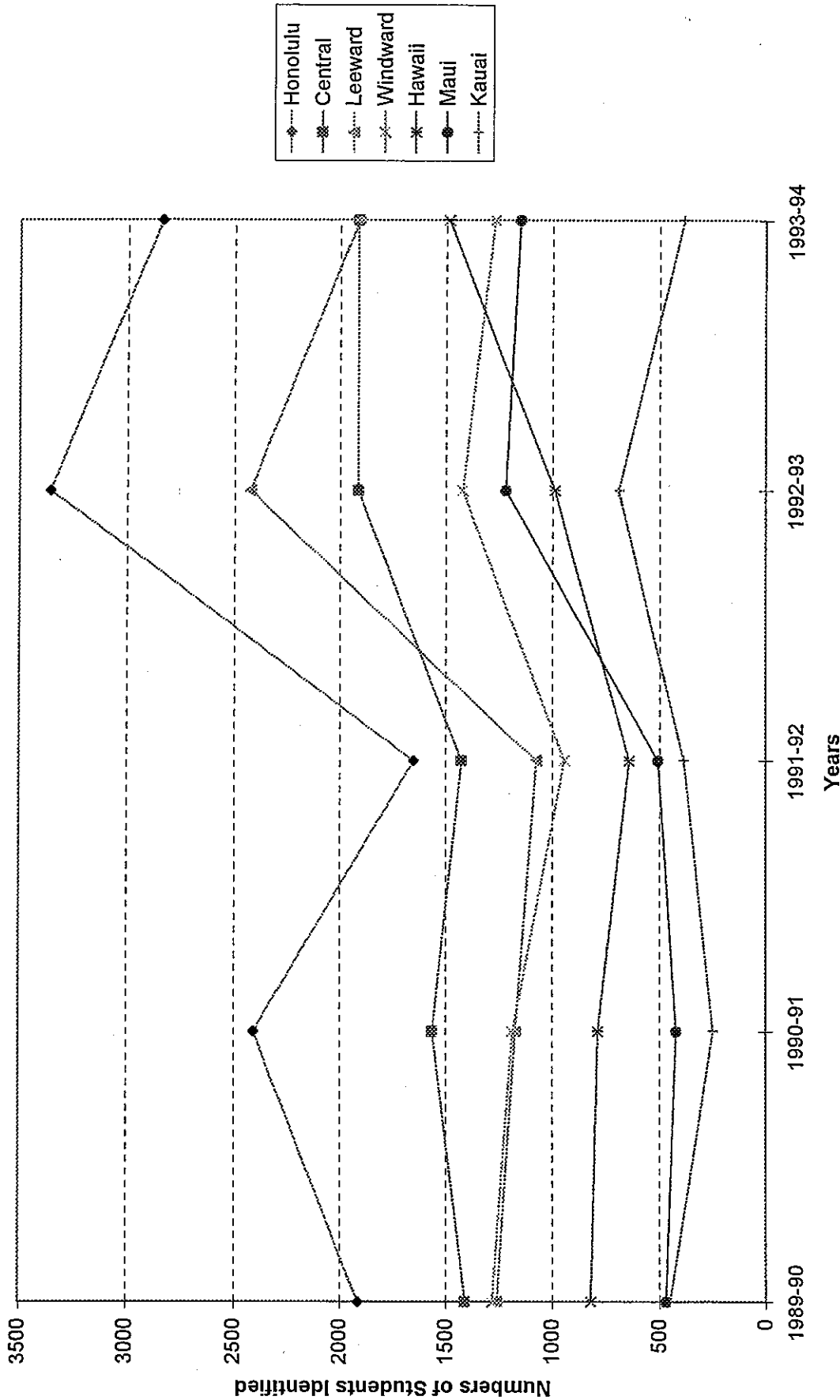
The current allocation formula is driven by the number of students that districts and schools identify as eligible. The Office of Instructional Services suspects this results in a numbers game. The office noted that the number of eligible students increased significantly in each of the districts when schools were informed that allocations would be strictly tied to student eligibility counts. Exhibit 2.2 shows the increase in students identified as eligible for services during FY1992-93. However, shifting the funding emphasis to the percentage of students served still results in a numbers game as evidenced by strategies schools are using.

The Windward and Kauai District Offices have attempted to prevent the numbers game by allocating funds in proportion to the number of students at each intermediate and high school in the district. This method assumes that there will always be students who need alternative services and are at-risk of dropping out of school. This method also allows schools to be more flexible in how they meet the needs of students. However the department's current allocation formula continues to favor schools with students who already exhibit at least two of the eight criteria used to identify students at-risk of dropping out of school. Allocations are therefore based upon the number of students who are already alienated.

In contrast to the department's allocation approach, a study recently released by the National Center for Education Statistics entitled, *National Education Longitudinal Study of 1988: Two Years Later: Cognitive Gains and School Transitions of NELS: 88 Eighth Graders*, found that more effective results can be achieved by targeting students much earlier in their high school careers before they are alienated. Shifting allocations to a proportion of the entire student body or to indicators that measure economic and other pre-alienation indicators will allow schools to focus on preventing alienation rather than intervention. The current allocation method is both reactive and inefficient over the long term. There has been little attempt by schools and districts to use the Comprehensive School Alienation Program positions and funds to meet student needs before students fall too far behind in meeting graduation requirements. As a result, the need for the program's intervention services continues to grow.

Exhibit 2.2

Numbers of CSAP-Eligible Students Identified by School Districts, FY1989-90 through FY1993-94



## Conclusion

The department has not provided the leadership and direction necessary to guide the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program. We found program goals vary greatly and that some schools have extended their program beyond the role and mission of public high schools. In addition the goals of various school level programs are in conflict with department and board policies on graduation and equal access to education. Furthermore, the department has also done little to identify student needs and how it can equitably distribute program resources to meet the needs of students cost effectively. The Department of Education has not evaluated and been accountable for the funds it has expended for the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program due to its poor management.

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## Recommendations

1. The Department of Education should clearly state the mission of public education. This mission should drive the implementation of all programs in the department, including the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program.
2. The Superintendent of Education should direct schools to discontinue the use of adult education programs for high school students and to include teen fathers in all pregnant and parenting teen programs.
3. The Office of Instructional Services should monitor and evaluate the Comprehensive School Alienation Program and Pregnant and Parenting Teen Program annually and submit written program evaluation reports to the superintendent, district superintendents and schools.
4. The Office of Instructional Services should revise its eligibility data form for the Comprehensive School Alienation Program to identify all students eligible for services, student service needs, and services provided. In addition, the office should revise its performance data forms to include indicators which clearly measure program goals. The form should include clear definitions for program performance measures which allow for uniform data reporting.
5. The Office of Instructional Services should work with the Office of Telecommunications in identifying the student and program information which should be stored on-line in the School Information System for program planning and evaluation. The Office of Instructional Services should report its findings to the Superintendent of Education and include a cost estimate and time-frame for implementation.

6. The Office of Instructional Services should work with the Budget Branch in revising the allocation formula for the Comprehensive School Alienation Program. The revised formula should encourage schools to be successful in preventing school alienation so that the need for alienation services decreases rather than increases.
  
7. The Office of Instructional Services should distribute Comprehensive School Alienation Program and Pregnant and Parenting Teen Program funds equitably among districts and schools by adhering to allocation formulas for these programs.

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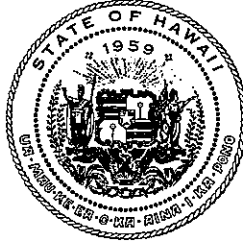
## Responses of the Affected Agencies

### Comments on Agency Responses

We transmitted drafts of this report to the Board of Education and the Department of Education on January 29, 1995. A copy of the transmittal letter to the Department of Education is included as Attachment 1. A similar letter was sent to the Board of Education. The Board and the department elected not to respond to the draft report.

ATTACHMENT 1

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

December 29, 1995

COPY

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

Dear Dr. Aizawa:

Enclosed for your information are three copies, numbered 6 to 8 of our draft report, *Audit of the Comprehensive School Alienation Program and the Pregnant and Parenting Teen Program of the Department of Education*. We ask that you telephone us by Wednesday, January 3, 1996, 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 Monday, January 8, 1996.

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

Marion M. Higa  
State Auditor

Enclosures

