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ABSTRACT

In 1989 the Department of Education contracted with Development Associates, Inc., to conduct a review of the evaluation and improvement practices of projects funded under Title VII of the Elementary and Secondary Education Act, often known as the Bilingual Education Act. The study focused on local transitional bilingual education and special alternative projects and was designed to describe and assess local evaluation practices and the use of evaluation results. This paper summarizes some of the highlights of the findings and conclusions of the study. Three major activities were conducted: (1) a file review of the applications and evaluation reports of a stratified random sample of 200 Title VII projects funded in fiscal year 1989; (2) a mail survey of all project directors and evaluators of 655 projects funded in that year; and (3) case studies of evaluation systems of 18 local projects. Findings indicate that the purposes and audiences for Title VII evaluations have not been clearly articulated by the U.S. Department of Education, and that there has also been no clear description of how the evaluation needs of the department and local projects should be integrated or prioritized. It was also found that evaluation reports are integrated or prioritized has not been made clear. Evaluation reports are not being used systematically, and, in general, their quality is only poor to adequate. It is concluded that there is an inherent tension between evaluation that is primarily conducted for a federal sponsor and that which is conducted for a local project. Two tables summarize evaluation purposes and needs. (SLD)

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The Status of Title VII Evaluation Practice:  
A Summary of a National Review of  
Title VII Evaluation and Improvement Practices

A Summary of a Report

By

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for Presentation at AERA  
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## A Review of Title VII Evaluation and Improvement Practices

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I. Background

In 1989, the U.S. Department of Education contracted with Development Associates, Inc., to conduct a review of the evaluation and improvement practices of projects funded under Title VII of the Elementary and Secondary Education Act, which is often known as the Bilingual Education Act. The study focused on local Transitional Bilingual Education and Special Alternative projects, and was designed to describe and assess local evaluation practices and the use of evaluation results. This presentation summarizes some of the highlights of the findings and conclusions of the study, and raises some issues which are relevant to many other programs with requirements for outside evaluations.

II. Methodology

The study consisted of three major activities: (1) a file review of the applications and evaluation reports of a stratified random sample of 200 Title VII projects funded in FY 1989; (2) a mail survey of all project directors and evaluators of all 655 projects funded in that same fiscal year; and (3) case studies of the evaluation systems of 18 local projects. In addition, we conducted interviews with all of the federal Project Officers of local Title VII grants within the Office of Bilingual Education and Minority Languages Affairs (OBEMLA), and with other selected education officials at the state and local levels.

### III. The Title VII Program Evaluation System

Through Title VII school districts compete for grants to support demonstration and capacity building projects to serve limited English proficient students. Title VII grants are for three years, with a virtually automatic two year extension available for the asking.

Since 1968, there have been requirements for Title VII projects to conduct evaluations of their activities. The structure and content of those evaluations have been guided by a number of requirements and resources defined and offered by the Department of Education. The evaluation requirements for Title VII, Part A projects are defined in Section 7033 of the Bilingual Education Act. Those requirements are expanded into regulations in Sections 500.50, 500.51, and 500.52 of the federal code (34 CFR). They include the following:

#### Section 500.50

A grantee's evaluation design must include a measure of the educational progress of project participants when measured against an appropriate nonproject comparison group.

The evaluation results must be computed so that the conclusions apply to the persons, schools, or agencies served by the projects.

The evaluation instruments used must consistently and accurately measure progress toward accomplishing the objectives of the projects, and they must be appropriate, considering factors such as the age, grade, language, degree of language fluency and background of the persons served by the project.

The evaluation procedures must minimize error by providing for proper administration of the evaluation instruments, at twelve-month testing intervals, accurate scoring and transcription of results, and the use of analysis and reporting procedures that are appropriate for the data obtained from the evaluation.

The evaluation procedures must provide objective measures of the academic achievement of participants related to English language proficiency, native or second

language proficiency (for programs of development bilingual education), and other subject matter areas.

A grantee's evaluation must provide information on the academic achievement of:

- (A) Current participants in the project, who are:
  - 1. Children who are limited English proficient; and
  - 2. Children whose language is English; and
- (B) Children who were formerly served in the project as limited English proficient, have exited from the program, and are now in English language classrooms.

This information must include:

- (A) The amount of time (in years or school months, as appropriate) the participants received instructional services in the project and, as appropriate, in another instructional setting;
- (B) The participants' progress in achieving English language proficiency and, for programs of developmental bilingual education, progress in another language; and
- (C) The former participants' academic progress in English language classrooms.

#### Section 500.51

In carrying out the annual evaluation under S500.50, a grantee shall collect information on:

- (A) The educational background, needs, and competencies of the limited English proficient persons served by the project;
- (B) The specific educational activities undertaken pursuant to the project;
- (C) The pedagogical materials, methods, and techniques utilized in the program;
- (D) With respect to classroom activities, the relative amounts of instructional time spent with students on specific tasks;
- (E) The educational and professional qualifications, including language competencies, of the staff responsible for planning and operating the project; and
- (F) The specific activities undertaken to improve prereferral evaluation procedures and instructional programs for LEP children who may be handicapped or gifted and talented.

Section 500.52

A grantee shall report to the Secretary annually, the information collected in S500.51 and an evaluation of the overall progress of the project including the extent of educational progress achieved through the project measures, as appropriate, by:

- (A) Tests of academic achievement in English language arts and, for programs of developmental bilingual education, second language arts;
- (B) Tests of academic achievement in subject matter areas; and
- (C) Changes in the rate of student:
  - (1) grade-retention;
  - (2) dropout;
  - (3) absenteeism;
  - (4) placement in programs for the gifted and talented; and
  - (5) enrollment in postsecondary education institutions.

Section 501.30 of the regulations describes the basis on which applications for Title VII grants are evaluated. The evaluation plan is worth 8 out of 100 points. According to the regulations, "The Secretary reviews the strength of the evaluation plan and its relationship to the educational goals of the project and the activities conducted to attain those goals."

In addition to the Federal statute and regulations, the Title VII evaluation system includes guidance materials developed by the U.S. Department of Education for local projects plus two Evaluation Assistance Centers.

The Bilingual Education Evaluation System (BEES) was published in November of 1987. It consisted of a User's Guide in two volumes (Volume I, Recommended Procedures; Volume II, Technical Appendices), plus a brief document entitled "Abbreviated Recommendations for Meeting Title VII Evaluation Requirements."

The BEES is a total evaluation system that involves a process evaluation component, an outcome evaluation component, and procedures for integrating the two. The most

innovative element of the system was the gap-reduction design that was recommended for assessing student outcomes.

At approximately the same time that the Department contracted for the development of BEES it also funded two regional Evaluation Assistance Centers (EACs). These centers were designed to assist Title VII grantees and other providers of services to LEP students with materials, training, and technical assistance related to evaluation. Such assistance was previously provided through Evaluation, Dissemination, and Assessment Centers (EDACs) and through Bilingual Education Multifunctional Support Centers (BEMSCs). These other Centers had multiple functions. The EACs were developed to focus specifically on evaluation.

The EACs have assisted OBEMLA by providing presentations at Management Institutes for new projects, they have prepared various materials for projects, and they have provided site-specific assistance through mail and telephone consultation, regional training events, and on-site technical assistance.

#### IV. Purposes of the Current System

Evaluations of Title VII projects can serve a variety of purposes at the federal, state, and local levels. There is no explicit statement of purpose in Title VII legislation or regulation, and in discussions with OBEMLA and other Department staff and officials, there was no consensus concerning evaluation purposes. In thinking about Title VII evaluations, we have identified nine major potential purposes which such evaluations could serve. We divide those purposes into three major categories: (a) those that primarily address federal needs; (2) those that primarily address local needs; and (3) those that address both federal and local needs. In describing these



purposes, we make a distinction between the national Title VII "program" and the specific "projects" which are implemented by local school districts.

In Table 1 these nine evaluation purposes are further described in terms of the key evaluation questions related to each. In general, outcome evaluations of projects focus on the sixth and ninth purposes, while process evaluations focus on the seventh and eighth purposes.

The Title VII evaluation regulations as they are presently written suggest a focus on the first four plus the eighth and ninth of these purposes. The regulations explicitly refer to information which is to be provided to the Secretary of Education, and the contents of the required reports suggest the types of uses which could be made. In communications with projects (through Management Training Institute sessions on evaluation, distribution of BEES, and EAC assistance), it also appears that OBEMLA promotes the sixth and seventh purposes on the list (project effectiveness assessment and project and program improvement). However, there is no clear statement of purpose for Title VII evaluations in the legislation or regulations, and OBEMLA does not clearly indicate how evaluation data are used by federal audiences. Thus, local school officials and local project staff are unclear about why and how evaluation data should be collected and used.

TABLE 1  
Title VII Evaluation Purposes and Related Evaluation Questions

Evaluation Purpose	Evaluation Questions
<b><u>Federal</u></b> 1. Compliance monitoring	<ol style="list-style-type: none"> <li>1. Are the intended people being served?</li> <li>2. Are funds being spent appropriately?</li> <li>3. Are the program goals being addressed?</li> </ol>
2. Grant funding evaluation	<ol style="list-style-type: none"> <li>1. Is the project being implemented as proposed?</li> <li>2. Does the quality of project implementation justify refunding?</li> </ol>
3. Program effectiveness assessment	<ol style="list-style-type: none"> <li>1. Is there demonstrable progress toward reaching program goals?</li> <li>2. Is the progress toward program goals worth the costs (including opportunity costs)?</li> <li>3. Are the program goals still relevant to the needs?</li> </ol>
4. Meta-analytic research	<ol style="list-style-type: none"> <li>1. What approaches work best with specific populations?</li> <li>2. What approaches have been shown not to be effective?</li> </ol>
5. Exemplary project identification	<ol style="list-style-type: none"> <li>1. Which projects demonstrate exemplary practices?</li> <li>2. Which projects or practices can be replicated elsewhere?</li> </ol>
<b><u>Local</u></b> 6. Project effectiveness assessment	<ol style="list-style-type: none"> <li>1. How successful was the project in meeting its objectives?</li> <li>2. Which project components were more or less effective?</li> <li>3. What project components should be continued after federal funding ends?</li> </ol>
7. Project improvement	<ol style="list-style-type: none"> <li>1. Were specific activities implemented as planned?</li> <li>2. Were intended short-term results achieved?</li> <li>3. How can project outcomes be improved?</li> </ol>
<b><u>Federal and Local</u></b> 8. Technical monitoring	<ol style="list-style-type: none"> <li>1. Do project activities involve accepted educational practices?</li> <li>2. Are the practices being used appropriate for the populations being served?</li> </ol>
9. Project and program promotion	<ol style="list-style-type: none"> <li>1. Which project outcomes are most salient and important?</li> <li>2. To whom are those outcomes most important?</li> </ol>

V. Summary of Major Findings

A. Purposes and Uses of Evaluations

1. As stated above, the purposes and audiences for Title VII evaluations have not been clearly articulated by the U.S. Department of Education. Indeed, there is disagreement within the Department concerning the purposes local project evaluations are to serve.
2. There also has been no clear description of how the evaluation needs of the U.S. Department of Education and of local Title VII projects should be integrated, or of how to prioritize them when they are in conflict.
3. Of the possible federal uses of Title VII evaluation reports, few, if any, are being realized under the present system. Reports are not being used systematically by the Department to assess Title VII at either the program or project level, and a majority of project directors believe that evaluations of projects could be more useful to those projects than they presently are.

B. Quality and Cost of Title VII Evaluations

1. In general, the quality of Title VII evaluation reports could be described as from "poor" to "adequate." There is considerable room for improvement in the evaluations which are done and the evaluation reports which are submitted.
2. The average project reported collecting data on three-quarters of the data elements required by Title VII regulations, and including data on only half of them in their 1989-90 evaluation report.

3. An issue frequently encountered by evaluators is the poor quality of data collection systems used by projects. The lack of available high quality process and outcome data hinders many evaluations. The extent to which the improvements of data collection/testing procedures stimulated by evaluation recommendations helped the projects in general, or just helped improve future project evaluations, could not be determined.
4. Although the cumulative amount spent on Title VII evaluation is quite large, the amount spent for individual evaluations is small. It is unreasonable to expect a detailed and comprehensive evaluation of a major project for \$3,000 to \$4,000, and it is also unreasonable to expect a meaningful process evaluation when evaluators only spend 4-5 days on-site per year.

#### C. Evaluation Implementation

1. Because of the small amount of funds available for evaluation in most projects, project directors often ask evaluators to focus on outcome evaluation. There tends to be little involvement by evaluators in the evaluation of project implementation processes.
2. Perhaps for this reason, evaluators are particularly involved in and interested in achievement test results, while project directors and project staff are particularly interested in recommendations for improving the design and operations of the project. If project staff had complete control over evaluation designs, there would be much less time and money spent on standardized testing of students.
3. In most cases, those performing Title VII evaluations have appropriate qualifications. The average Title VII project was evaluated by an

individual with 15 years of experience in evaluating educational programs, and 10 years of experience evaluating Title VII projects.

4. There is no convincing evidence indicating the superiority of either external evaluators or district evaluation staff. The ability and motivation of the evaluator are more important than that person's organizational affiliation.
5. Evaluators who do multiple Title VII evaluations are more likely to meet the mandates of Title VII evaluation regulations. However, they are not any more likely to meet the needs of local projects.

## VI. Conclusion

In conclusion, we believe there is an inherent tension between evaluation which is primarily conducted for a federal sponsor and evaluation which is conducted for a local project. For the federal sponsor, monitoring and compliance review are important elements of the evaluation process, while for the local project, monitoring and compliance review may actually interfere with the collegial relationships needed to carry out successfully process evaluation. Similarly, the reporting approaches which are most useful to local projects (quick, informal, and focused on specific individuals or activities) have little utility for federal audiences. In Table 2 we rate the importance of the nine purposes of Title VII evaluations for three audiences: federal officials, local school officials, and local project staff. The table demonstrates the divergence of needs of the three groups.

It is important that those designing evaluation systems for federally-supported local projects recognize these conflicts, and to the extent possible, design systems to meet the needs of the various groups. Given the limited resources that have been available for evaluation (the median Title VII project evaluation budget in 1989-90 was \$3,500), there has been a natural tendency on the part of those performing evaluations to focus on the

legally-mandated needs of the federal sponsor. However, if the needs of local audiences for the evaluation are ignored, the data which are collected may not validly reflect actual project activities and outcomes (because of low motivation for data collection), and important opportunities for project improvement through effective process evaluation may be lost.

TABLE 2

Importance Of Various Evaluation Purposes For Different Audiences

Evaluation Purpose	Federal Officials	Local School Officials	Local Project Staff
<b>Federal</b>			
1. Compliance monitoring	Very important	Moderately important	Not very important
2. Grant funding evaluation	Very important	Not at all important	Not at all important
3. Program effectiveness assessment	Very important	Not at all important	Not at all important
4. Meta-analytic research	Very important	Not at all important	Not very important
5. Exemplary project identification	Moderately important	Not at all important	Not at all important
<b>Local</b>			
6. Project effectiveness assessment	Not very important	Very important	Moderately important
7. Project improvement	Not very important	Moderately important	Very important
<b>Federal and Local</b>			
8. Technical monitoring	Very important	Not very important	Moderately important
9. Project and program promotion	Moderately important	Moderately important	Very important