

SEVEN YEARS OF EDUCATIONAL AUDITING IN FLORIDA: A CRITIQUE

Rick Nations

Sarasota County Schools

ESEA Title III/IV-C projects in Florida have been audited during the past seven years, using a set of procedures, trained independent auditors and a set of standards uniform across projects. The procedures for auditing were developed primarily through the efforts of Dr. Ray E. Foster of the Florida Department of Education. He entitled the audit methodology, The Standard Educational Project Audit (SEPA). SEPA was developed as a component of a larger existing structure. That structure was conceived and implemented to achieve the purpose of developing and sharing new programs, practices, and wares. The structure employed the use of a project format as the vehicle for such development and sharing. SEPA was designed to focus on certain critical elements of that structure. SEPA was developed during a period of six years with the seventh year audit methodology being identical to that of the sixth. Foster (1978a) states

The Standard Educational Project Audit (SEPA) is a quality assurance procedure applied to projects funded through ESEA, Title IV-C, Innovation, in Florida. The purpose of the audit is the early detection of technical or organizational problems which could jeopardize the completion or success of development or demonstration projects. (p. 1)

The purpose of this paper is to critique the seven years that SEPA has been used in Florida. This discussion will be divided into two main sections; Reflections on SEPA and The Future of SEPA.

Reflections on SEPA

This section is divided into four sub-parts; Changes in SEPA, Some Positive Features, Some Negative Features, and Some Unclassified Features.

Changes in SEPA

Many changes have occurred in SEPA during its seven years of use in Florida. Several changes are related to the forms used. For the first six years the forms, called Working Protocols, were modified yearly. There were no changes in the seventh year. Over the years, these forms have increased in number and specificity. In the first year, there were few forms and wide latitude on the part of an auditor in the writing of the final audit report. Large sections of that first year report were prose in nature. The current version has a uniform set of audit standards, described in much detail, and a Working Protocol for each audit standard. Each standard must be rated in one of a limited number of ways: Consistent, Minor Inconsistency, Problem Situation, Crisis Situation, or Not Applicable. At the end of the audit report there is another form which lists the ratings
1
made of the audit standards.

1
Simultaneous with the development of SEPA, but on an approximately six-month advanced schedule, was occurring the development of the guidelines for writing ESEA Title III/IV-C projects. It was several years before the guidelines for writing projects and the requirements/Working Protocols for auditing projects came into agreement.

Some of the changes in SEPA are related to the number and nature of the auditors. The first year of auditing required that SEPA be conducted by one auditor. That one auditor had to be responsible for auditing all areas of the project; e.g., management, development, evaluation. The next year that procedure was changed so two auditors were used. The single auditor process required people with a background in program evaluation and/or research. When the two-person audit team came into existence, this type of person was teamed with a program content person. This has changed again. The evaluator-researcher person still exists on the team and is usually paired with a person whose background is the area of instructional design and development.

When auditor pairs were first established, they tended to remain together and to remain with the same project through the cycle of the project; e.g., the same two auditors would audit the same project for up to three years. This was the tendency, although obviously with various auditors declining to serve in a successive year or project directors expressing a strong desire for a change in auditors, there were always some changes in audit teams and project assignments. Currently, it is routine to change the make-up of the auditor teams and the assignment to projects.

The duties of auditors have changed. In the early years of SEPA, project staff attempted to turn the auditors into consultants and to obtain from them specific recommendations, particularly in the area of perceived

project weaknesses. Auditors, however, were instructed not to discuss a project with project staff in any manner other than as specifically directed by the audit standards. Auditors could not indicate strengths or weaknesses to the project staff. They could not make professional judgments concerning the merit or efficacy of the project, nor could they make recommendations no matter how serious observed weaknesses appeared to them.

Based upon input from both project staff and auditors, the audit methodology was changed in stages to provide two formal types of post-audit comments perceived to be useful to project and Florida Department of Education staff. First, is the Post-Audit Conference (PAC). This occurs as the last activity prior to the auditors exiting from the project site. In this conference, the tentative rating of each audit standard is presented to the project director and anyone else who attends the PAC at the invitation of the project director. Tentative recommendations are presented at this time also. The Post-Audit Conference also provides a chance for the project staff to indicate to the auditors information which may have been overlooked by either the project staff or by the auditors. However, it is not a time of argument.

Several weeks following the actual audit site visit, a final written audit report is presented to the project director by the Florida Department of Education. Usually, if the report is favorable, it is mailed to the

project director. If the report is unfavorable, a more formal presentation is made by an appropriate staff member from the ESEA IV-C office in the Florida Department of Education. Upper level LEA decision makers may attend this presentation. The second type of formal post-audit comment, which is a change in the audit methodology, occurs when the next annual grant application is submitted for review and negotiation. Every discrepancy rating presented by an auditor in the final written audit report must be addressed. In addition, the grant application must contain a discussion of the extent to which the auditors' recommendations were embraced or rejected. The new grant application is sent to the audit team and each auditor must complete a Post-Audit Review form indicating whether or not the deficiencies or weaknesses in the project as noted in the audit still exist and whether any new ones inadvertently have come into being. These two changes now provide immediate feedback to the project staff, including recommendations, as well as timely feedback to Florida Department of Education staff on the project staff's attempt to correct any problems detected in the SEPA.

The training session prior to performing a SEPA has undergone a change. In the first year all auditors were trained in the same manner because all were novices, all performed the same duties. There then followed a period of a few years in which all auditors, novice or experienced, were given the same training for part of a day, with specialized training for the

specialized assignments of auditors; i.e., management auditors and program auditors being trained separately for part of a day. This resulted in complaints that experienced auditors were being subjected to redundant training. A change occurred which had first-year or rookie auditors being trained a day early, followed by a second day during which the experienced auditors were in attendance. Another change occurred because during the seventh year only experienced auditors were utilized. That training session included all auditors for a full day and was more of a refresher course because the methodologies had not changed. But in addition, certain concepts were developed and strengthened; e.g., how one writes a summary comment or comments detailing the big picture of a project.

There have been two other changes which deserve comment. First, there is no longer an audit in the third year of a developmental project. For most of the seven-year history of SEPA, an audit was performed in each of the three developmental years. Second, Foster (1978b) has prescribed and described the demeanor an auditor should have while on-site. Certain changes have occurred to the extent that now an auditor must still be independent and free from bias, but must no longer remain cool and aloof. In effect, the auditor has been changed from a somewhat distant and cold outsider to an external professional who, while using the same uniform criteria for auditing a project, can remain his or her own professional person.

Some Positive Features

It is this writer's opinion that Florida's methodology for conducting an educational audit is more rigorous and highly developed than that required in other states or in other Federal programs. He is reminded of an incident which occurred in an AERA Training Institute on the topic of Evaluation, held in Clearwater Beach, Florida in 1976 when one of the two well-known trainers distributed materials dealing with the activities of a regional lab in the area of educational auditing. At a subsequent time--lunch, dinner, or whatever--Dr. Foster's SEPA materials were presented to and discussed with this particular trainer. The result was that the following morning when that evaluator was recapping the previous day's events, he made special note that the regional lab's audit procedures were rather primitive and should be considered as first draft only and should not be considered to be as sophisticated, as well developed, or as rigorous as those used in Florida.

Rigor for rigor's sake is not commendable, but when rigor reduces or eliminates serious problems and/or hucksterism in education, then it is most commendable. The use of SEPA methodology has identified flaws in the development of every project audited. Usually, these problems were corrected, and the project's mission accomplished and certified through the process of validation (see below). The institution of the Post-Audit Conference and the Post-Audit Reviews has refined this identification and resolution process. SEPA also has provided a type of free consultation

to the project. The auditors are paid for their efforts by a third party contractor. That third party contractor holds a contract directly with the Florida Department of Education, but the auditors work for the contractor and not the Department, thereby assuring independence from the Department. The project's budget is not charged for the audit; hence, any recommendations auditors make become free consultant services to the project staff.²

The SEPA methodologies have contributed to the literature on educational auditing. One major contribution is in the method for rating a discrepant condition. A discrepancy occurs when an auditor observes a condition in a project which is at variance with the specified audit standard. The rating method used involves two variables; risk and recovery.³ Their combination results in the three types of discrepant conditions listed previously in this paper. Another contribution of SEPA has been its required training. This training has provided a pool of experienced auditors who can assist school districts or other programs in developing audit procedures tailored for those other programs or school districts. Finally, SEPA has prepared projects for the process known as validation. At the end of the

²
Auditors are precluded from having a formalized, paid consultant arrangement with the project prior to the SEPA audit, and with only one exception known to this writer in seven years, for a period of one year after the SEPA audit.

³
Risk is the threat that the observed discrepancy will prevent the accomplishment of the mission of the project. Recovery is the ability with which the project staff, using available time and resources, can resolve the discrepant condition. The condition is rated as to its risk, then the rating value for ease of recovery is subtracted.

third developmental year, a team external to the state visits the project and determines whether or not the mission has been accomplished. If validated, project wares can be disseminated within and outside the state.

Some Negative Features

As with any state of the art methodology, it takes trained people to implement SEPA. This is not necessarily a negative feature. However, it is viewed by some as a negative feature because SEPA appears to be so complicated that it requires one or two days of training. The complexity is both real and unreal. It is real because it is a new procedure and one must be trained before implementing any new procedure. It is unreal because some of the complexity relates to the language used. The present SEPA materials contain many unfamiliar words. Some of these are viewed as avoidable jargon.

The writer believes the loss of the third year SEPA audit can hinder the project staff's ability to undergo a successful validation. A rigorous audit in the third year resulting in a favorable audit report can be used as substantiation of mission accomplishment during the validation process. That process of going through an audit which is closely related to the validation methodology could prepare the staff for the upcoming validation.

4
SEPA is a problem detection audit, the validation process is an accomplishment certification audit.

The SEPA has not provided substantive assistance to project staff in preparing their application to the Joint Dissemination Review Panel (JDRP) for receiving additional federal funds for national dissemination. The JDRP requirements are similar to, but substantially different from the SEPA requirements for demonstration projects. Also, the JDRP application normally is filed up to one year following the last SEPA audit of the demonstration project and, perhaps by that time, the project staff is no longer used to the rigor required for making such applications.

Both the Florida Department of Education (FDoE) and the project staff create problems in the SEPA process. First, whereas SEPA is accepted as legitimate and important by some, there are project directors who still do not meet the deadline for sending a complete packet of materials to auditors, thereby delaying the amount of work which can be done on a project prior to the site visit. The FDoE has caused some difficulties in auditing by not identifying problems in the grant application during the negotiation phase. This was a greater problem in the early and middle developmental phases of SEPA than in the immediate past two years. The institution of the Post-Audit Review of the grant application has provided the FDoE with the type of experienced and trained professional review which they cannot do with their limited staff. Still, things seem to be approved in a grant application which perhaps are serious enough to require a change prior to approval.⁵

⁵
The reader should keep in mind that this writer might be expressing a rather limited viewpoint. It might be better to let a project be funded with a major weakness known to both the Florida Department of Education and project staff, and one which will be remedied, than it would be to delay funding of the project for perhaps a month or six weeks into the new fiscal year.

Some Unclassified Features

In the preparation of this article, this writer was faced with three considerations which he was unable to classify under the previous two sub-headings. It is up to the reader to make judgments as to whether they are positive or negative features.

The movement of auditors to various projects each year and the change in the makeup of the auditor pairs may be a cause for concern. One establishes a working relationship with an audit partner one year and must repeat that process with a new partner the next year. As auditors become more experienced this may become less of a problem.

One becomes familiar with a project and then leaves it. It takes a great deal of time to prepare for an audit, to become familiar with a project, particularly as a project gets into its second or third year. All of that preparation time is lost when the auditor moves to another project. On the other hand, it may be quite difficult to judge the merits of one's own recommendations and hence, perhaps, a new set of auditors ought to come to a project which has implemented the recommendations of a prior set of auditors.

The second consideration focuses upon project director acceptance of SEPA. There is a strong observable acceptance of, and commitment to, SEPA by many project directors, but the question remains as to how deep that acceptance and/or commitment goes. Is there more than a surface

tolerance of SEPA? That is the question for no satisfactory answer exists. Undoubtedly, there are many project directors who are strongly committed to SEPA, who fully understand and accept that its purpose is to detect problems and help a project become successful. Yet, a few project directors may perceive SEPA as an irrelevant, externally required hurdle which must be gone over with the least amount of effort so as not to disrupt the activities of the project.

Finally, have SEPA audits really made a difference? This writer has audited certain projects where the audits have been very negative, but the response was gratifying professionally. The project turned around and the project's program, practices, and materials were validated. That is a very positive testimonial for the difference that SEPA can make. Yet this writer also has audited at least one project, and knows of others, where two successive audits appear to have been written by the same people on the same project during the same year; but were written by four different auditors over a two-year period. In those cases, SEPA seems to have made little difference in the operation of the projects.

The Future of SEPA

First, this writer strongly recommends that SEPA audits continue to be conducted on all existing ESEA IV-C development and demonstration projects in Florida. There is a need for a group of independent, trained experts in

the field of evaluation/research and instructional design/development to assess the developmental efforts of projects as a mechanism for quality control. These audits are an inexpensive method of accomplishing the task of providing external reviews of projects, some consultive help, and the type of credibility which can only be obtained from such processes. Many positive results can be documented from the use of SEPA methodology, which requires only a two-day visit by two professional members of a team. However, if ESEA IV-C becomes a developmental effort of a few months in duration, then SEPA would no longer be useful, or as useful, for problem detection. But, if modified, SEPA might be used as a type of accomplishment certification audit.

Assuming ESEA IV-C developmental projects continue to be basically a three-year developmental effort, then the third-year SEPA audit should be re-established. A continued emphasis would be upon problem detection, but major emphasis would be upon helping the project staff prepare for the validation and JDRP efforts. ⁶ If the third-year SEPA audit is re-established, the same audit team, when possible, from year 2, should be used. Experienced auditors, familiar with the project, should be able to make that audit a rigorously planned process by which the project staff is subjected to a

6

Even though the JDRP application may not be submitted until one year after the validation effort, at least the first draft of the JDRP application would have been prepared.

simulated validation, with an emphasis on detecting problems likely to prevent a successful validation effort. Should major problems in the developmental efforts of products be uncovered, then validation is not likely and would not be applied for; thereby, SEPA would have fulfilled its original purpose.

The validation effort should continue to be a three-person team from outside the State of Florida because of the credibility of such a team. Should that effort, for whatever reason, no longer be required or desired, then SEPA ought to be revised so as to become an accomplishment certification audit.

References

Foster, R. SEPA-78: A capsule report. Tallahassee, Fl: Research and Development, Bureau of Federal Programs. Florida Department of Education, June 1978a.

Foster, R. E. SEPA: Standard educational project audit for development and demonstration projects: Manual for project auditors. Tallahassee, Fl: Research and Development, Bureau of Federal Programs. Florida Department of Education, December 1978b.