Diagnostic Assessment for Reading:
Portable Elementary Reading Assessment Pilot Program

H.B. 302 (2011)

Report of FY 2013

Prepared by the

Utah State Office of Education
Assessment and Accountability

November 6, 2013

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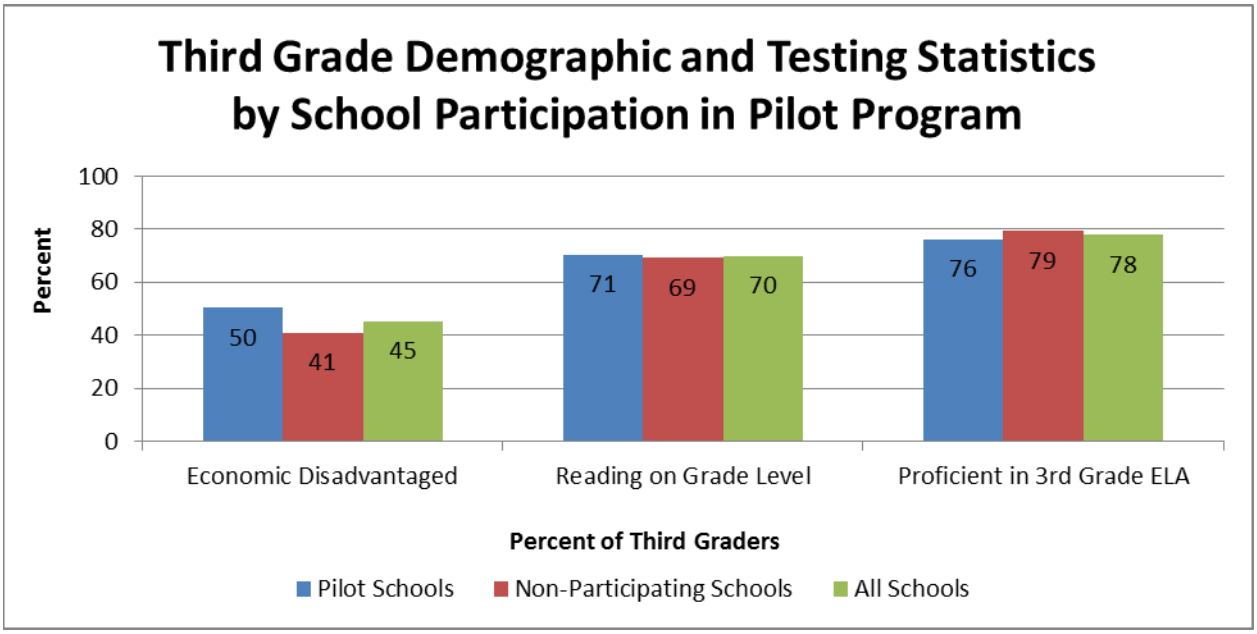
Background

Funded through House Bill 302 (2011), Utah contract #126212 between the Utah State Office of Education and Wireless Generation, Inc. was implemented as a pilot program (Pilot) in the 2011-2012 and 2012-2013 school years to provide a portable, electronic, software-based platform for Utah's reading assessments for kindergarten through third grade students and to provide corresponding online reporting and instructional tools. The bill requires the State Board of Education to provide to the Public Education Appropriations Subcommittee, among other reports, an evaluation of the diagnostic assessment system for reading.

Evaluation

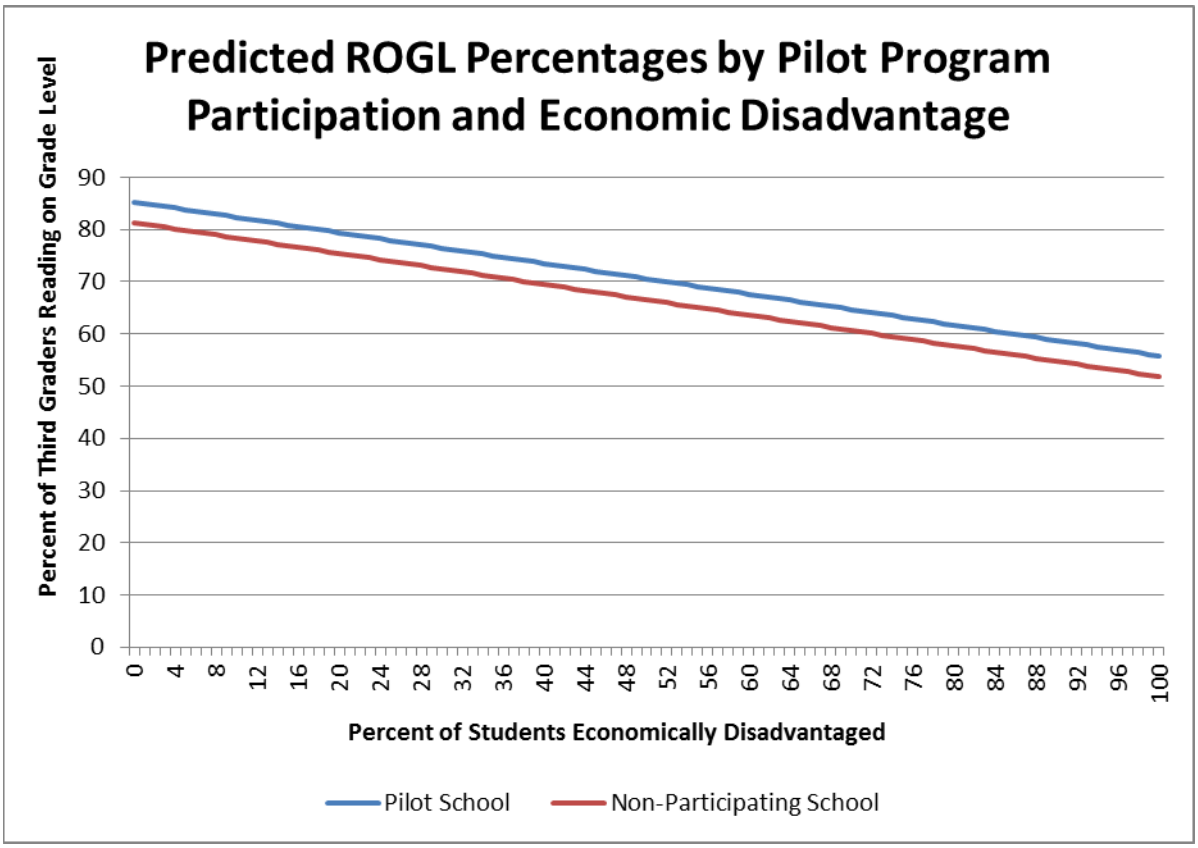
For the most recently completed school year (2012-2013), 270 of 645 eligible schools elected to participate in the Pilot. Overall, in the Pilot-eligible third grade population, 78% of students are proficient in English Language Arts, 70% are reading on grade level, and 45% are economically disadvantaged. Schools that participated in the Pilot had a slightly lower average third grade ELA proficiency, slightly higher average of reading on grade level, and slightly higher average of economic disadvantage compared to schools that did not participate in the Pilot. See table, below.



Regression analysis, a type of statistical analysis for predicting the effect of one factor on another, was used to determine whether participation in the Pilot was statistically significant in predicting differences in reading on grade level and English language arts proficiency levels. Regression analysis is especially useful for this purpose because it allows researchers to control for effects of additional factors in addition to the primary factors. In this case the primary factors we want to look at are participation in the Pilot and its impact on third grade reading

level and English language arts proficiency percentages. Economic disadvantage is often shown to have an impact on learning and testing performance, so we controlled for the effect of this factor to get a clearer picture of whether Pilot participation impacts the outcomes in question.

Using regression analysis and controlling for the effect of economic disadvantage on both ELA proficiency and reading on grade level, we determined that participation in the Pilot made no statistically significant difference for ELA proficiency, but was statistically significant for predicting differences in reading on grade level outcomes. A school with no economically disadvantaged students that did not participate in the pilot program was predicted in the regression model to have 81% of its third graders reading on grade level. The percentage reading on grade level was predicted to decrease by 0.295 percent for each percent of the student population that is economically disadvantaged. Thus, a school with 100% of its students economically disadvantaged and that did not participate in the pilot program was predicted in the regression model to have 52% of its third graders reading on grade level. For schools that did participate in the pilot program, the predicted reading on grade level percentage is 4% higher at each percentage level of economically disadvantaged students. See the graph below.



Report to the Utah State Board of Education

Report Number 2012-24

Utah's Diagnostic Assessment System Contract for K-3 Reading

August 2, 2013

Utah State Office of Education
Internal Audit Department

UTAH STATE BOARD OF EDUCATION

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MEMORANDUM

TO: Members, State Board of Education

FROM: Natalie Grange CPA, CFE
Internal Auditor

DATE: August 2, 2013

SUBJECT: Report on Utah's Diagnostic Assessment System Contract for K-3 Reading (Report #2012-24)

Transmitted herewith is our report, **Utah's Diagnostic Assessment System Contract for K-3 Reading** (Report #2012-24). The objectives and scope of this performance review are explained in the first chapter.

Copies of this report will be released to the Utah State Board of Education and the Utah State Auditor's Office.

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Executive Summary

A Performance Audit of the Utah's Diagnostic Assessment System Contract for the K-3 Reading

Chapter I: Background

In 2004, the Utah State Legislature created the K-3 Reading Improvement Program in Senate Bill 230 (*Utah Code* 53A-17a-150) and later amended in *Utah Code* 53A-17a-150 for the use of no more than $7.5 million for computer-assisted instructional learning and assessment programs. The Utah State Board of Education (the Board) officially designated the Dynamic Indicators of Basic Early Literacy Skills (DIBELS) test as the State approved reading benchmark in June 2011. *Utah Code* 53A-1-606.7 required the Board to contract with an education technology provider, selected through a request for proposal (RFP) process, for a diagnostic assessment system for reading for grades K-3.

The RFP for a statewide diagnostic assessment system lacked competitive respondents due to the very specific technology requirements in the State statute and the requirement to administer DIBELS. Statute requires that the benchmark assessment must be available to download to a portable technology device, and the device must be able to operate without an internet connection. The criteria appears to have resulted in the elimination of other competitive respondents prior to the issuance of the RFP.

Discrepancies in the contract terms and periods of service along with unclear professional development deliverables creates confusion between the USOE and the vendor. The legislation, the RFP, and the final contract all state differing authorized payment amounts. The statute and the RFP span two school years; however, the contract spans three school years. The pricing structure in the contract is vague and does not clearly identify a consistent billing measure. This resulted in a difference between measurement bases of $35,080 for school year 2012 and between $65,990 and $142,802 for school year 2013. It has also resulted in the State paying full price in year one of the contract for half a year's service, and may potentially result in the State not receiving a full year service in the last year of the contract. The package price for trainings makes it difficult to ascertain whether Wireless Generation has fulfilled the training requirements set forth in the contract. A contract amendment has been initiated with the vendor to address the issues noted above.

Chapter II: Utilization

Wireless Generation's utilization rates could be more widespread. In school year 2012, 43% of LEAs and 27% of K-3 students in the State were using the Wireless Generation program. In school year 2013, 66% of LEAs and 40% of K-3 students in the State were using the Wireless Generation program. We do not expect significant growth in year three as three school districts (Alpine, Canyons, and Uintah) have waivers to use an alternate assessment system. Some LEAs are purchasing their own assessment system to consistently assess all students in grades K-6. Others express that the program is too costly to maintain without State support.

Utilization of tools in the Wireless Generation Program. Forty-three of the 68 LEAs using Wireless Generation in school year 2013 accessed the Now What tool and 42 LEAs accessed the Small Group Advisor tool. That is more than 60% of participating LEAs that are utilizing the tools

included in the software contract. Moreover, 35 LEAs printed parent letters from the feature Home Connect letters.

How did Utah's contract compare to other contracts? The State's current contract provides for a graduated rate of $22-$18.50 per student, or a cap of $2,750,000 depending on total students utilizing the system. Park City School District early adopted Wireless Generation at a rate of $16.07 per student. South Sanpete purchased services for 4-5 grades at $14 per student. Millard and Wasatch School District purchased services for 4th grade at $14 per student. The contracts with the various school districts did not include access to the Now What tools when compared to Utah's contract. The State of New Mexico paid approximately $16.69 per student for services statewide for the school year 2012-2013; however, Wireless Generation representatives indicated professional development services were substantially less in value than those provided to Utah. On average, the four LEAs paid $2.43-$4.50 less than the State's negotiated price. Utah would need to enroll approximately 47% or 69,363 more students into the Wireless Generation program to achieve the lowest contract price of $13.85 per student.

Chapter III: What is DIBELS?

Background on DIBELS. Prior to 2011, LEAs administered DIBELS using a traditional paper and pencil method where scores were tabulated by the administrator and then manually entered into a monitoring and reporting system. With the adoption of the State contract, the LEAs using Wireless Generation enter student names and information into the program. The assessment is administered the same way, but the results are input directly into the program, which tabulates the score and transfers test data to the management system. Data and reports are available immediately. Research indicates that assessments administered electronically have the potential to produce more accurate and consistent results over time.

Does administering DIBELS electronically save time? The time needed to administer the test using either a paper and pencil method or a portable electronic device is virtually the same, on average it takes 5-10 minutes. Administering DIBELS three required assessments electronically saves test administers approximately 15 minutes per student, per year. In a classroom of 22 students, a teacher could save around 5.5 hours a year which equates to a time savings valued at $221.32. The time saved increases as classrooms have more students. If all 198,554 K-3 students in fiscal year 2013 used an electronic assessment system, the potential time savings is approximately 49,639 hours, valued at $1,997,473.

Does administering progress monitoring electronically and performing data analysis save time? Wireless Generation provided data demonstrating that Utah teachers are utilizing a 60 second progress monitoring measure throughout the school year. As of April 2013, 40,564 unique students were administered 279,725 progress monitoring assessments. Wireless Generation estimates that each assessment equates to a two minute time savings per assessment. If the data is annualized, it results in 12,169 hours saved over a nine month school year and valued at $489,688. The immediate data provided by Wireless Generation to administrators enables students to be grouped together by intervention needs and accessed throughout the school year.

Chapter IV: Ongoing Funding

Low enrollment numbers have led to a fund balance. Since fiscal year 2012, $4.75 million has been appropriated for this contract, but only $1.1 million has been spent with another $1.5 million expected to be invoiced for school year 2013. A credit of $405,320 will be applied to school year 2014 from invoicing issues in school year 2012. This leaves a restricted unexpended fund balance of approximately $3.4 million. With an ongoing appropriation of $800,000, a fund balance will remain as we estimate the cost of this program will range from $1.5 million to $1.9 million for school year 2014.

Classroom instruction and interventions vary depending on student and resources available. The following instructions and interventions were indicated by a school district. Students assessed at benchmark are given monthly progress monitoring assessments or exercises, and their skills are maintained through regular classroom instruction. Students assessed at below benchmark receive semimonthly progress monitoring assessments or exercises, and an average of 30 minutes a week of individual or small group work. Students assessed at well below benchmark receive semimonthly progress monitoring assessments or exercises, and an average of 45-60 minutes of individual or small group intervention.

While the electronic administration of a benchmark is a critical piece of the overall reading improvement strategy, it does not appear to be the pivotal element to ultimately improve reading proficiency. Our survey indicated that literary directors would use new unrestricted funds to hire additional reading aides, specialists, and coaches and training them and teachers to work in small groups and one-on-one with students.

How do comparable vendors rate? We noted two vendors, Wireless Generation and VPORT, that have programs which facilitate the electronic administration and scoring of DIBELS and the automatic uploading of student data into a data management and reporting system. Another vendor, DMG, sells a data management and reporting system; however, DIBELS must be administered, scored, and input manually at a cost of $1 per student. VPORT can administer DIBELS on a laptop at a cost of $1.95 per student. The data reporting and analysis features and additional intervention measures are not exactly comparable between these vendors.

Our survey indicated that the time saving aspect of administering the benchmark assessment electronically, uploading of data, and the reporting and tracking results were benefits. However, the costs of purchasing devices to administer the assessment and the high cost of the Wireless Generation program are deterrents.

Present funding of the K-3 Reading Improvement Program. The K-3 Reading Improvement Program began in 2004 with an ongoing appropriation of $12.5 million and a one-time appropriation of $2.5 million for 40 school districts and 10 charter schools participating. Currently, the appropriation increased to $15 million for 41 school districts and 85 charter schools participating. These funds have virtually been expended each year unlike the funds for the diagnostic assessment system. About $1 million will remain unexpended in fiscal year 2015 and restricted for a diagnostic assessment system that only 40% of the State's K-3 students utilize. A combination of a data management and reporting system and more school level personnel has the greatest potential to significantly impact the goal of reading proficiency for all K-3 students.

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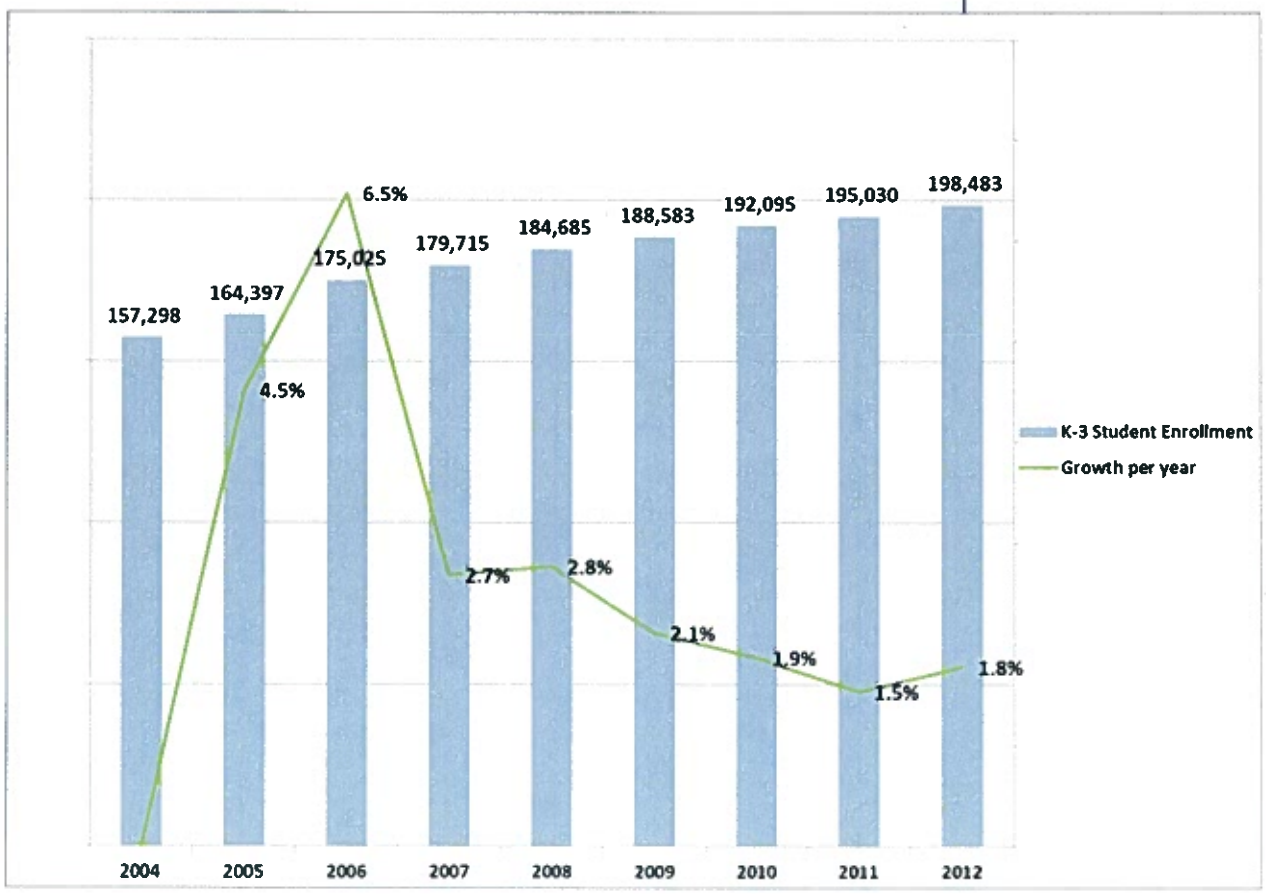
Chapter I Background

In 2004, the Utah State Legislature created the K-3 Reading Improvement Program in Senate Bill 230 (*Utah Code* 53A-17a-150). The K-3 Reading Improvement Program provides state funding, based on formula, to Local Education Agencies (LEAs) who develop plans for reading proficiency improvement that include elements of assessment, intervention strategies, professional development, reading performance standards, and specific goals for learning gains for K-3 students reading on grade level.

The LEAs whose plans are approved by the Utah State Board of Education (the Board) receive K-3 reading funds, and are required to contribute local revenues dedicated to the plan. *Utah Code* 53A-1-606.5 outlines the details of the required reading plans for K-3 proficiency. Section 606.6 requires each LEA to administer, report, and monitor progress of the required benchmark assessment in grades 1-3. It also sets forth expectations for focused interventions for students reading below grade level.

Figure 1: K-3 Student Enrollment Has Increased 26% from 2004 to 2012



When the K-3 Reading Improvement Program was created in 2004, there was no statewide elementary reading test and no common assessment mandated by SB 230. A WestEd report, dated March 2007 titled "Analysis of Utah's K-3 Reading Improvement Program (Year 2)," indicated that most LEAs used the Dynamic Indicators of Basic Early Literacy Skills (DIBELS) test to assess kindergarten, and the English Language Arts CRT combined with another assessment such as DIBELS or DRA for grades 1-3 to measure and report year end reading progress data. In the 2007 report, WestEd indicates that 69% of participating LEAs (40 school districts and 17 charter schools) used K-3 reading improvement funding "...to train staff to administer and interpret the DIBELS reading assessments to better monitor student progress."

The current statute requires LEAs to administer benchmark assessments to students in grades 1-3 at the beginning, middle, and end of school year, and inform parents of results after each assessment. Some LEAs also include kindergarten in the assessment process. Literacy specialists at the Utah State Office of Education (USOE) indicate that direction was given to LEAs to use DIBELS as the state benchmark assessment prior to legislation passed in the 2011 legislative session. Most LEAs had invested significant amounts of money and time into training and purchasing materials for the DIBELS assessment during the implementation of the K-3 Reading Improvement Program. Furthermore, DIBELS is readily available to all LEAs at no charge, and provides a consistent measurement base amongst LEAs for grades K-3. The Board officially designated DIBELS as the State approved reading benchmark in June of 2011.

In 2011, HB 302 amended *Utah Code* 53A-17a-150 allowing the use of no more than $7.5 million of the appropriation for the K-3 Reading Improvement Program for computer-assisted instructional learning and assessment programs. The bill also enacted *Utah Code* 53A-1-606.7 which required the Board to contract with an education technology provider, selected through a request for proposal (RFP) process, for a "diagnostic assessment system" for reading for grades K-3. This legislation provided for $1.75 million in fiscal year (FY) 2012 and $3 million ongoing thereafter. The contract that resulted from this legislation is the subject of the remainder of this chapter.

RFP for Diagnostic Assessment System Lacked Competition

In compliance with *Utah Code* 53A-1-606.7, the USOE issued an RFP for a diagnostic assessment system, available for the 2011-2012 school year

(SY) in July 2011. At this time, the Board had designated DIBELS as the State benchmark test, thus administration of DIBELS as the benchmark assessment was a primary requirement of the RFP. The statute required that the RFP include formative assessments for high-risk students, have the capability of identifying lessons to develop reading skills, and have administrative monitoring capabilities.

The statute also mandates very specific technology requirements be included in the RFP. The benchmark assessment must be available to download to a portable technology device so that the administrator of the assessment can administer it in any location. The statute requires that the device, once loaded, be able to operate in stand-alone mode if the internet connection was lost, and reports must be available to view and print immediately.

Only two vendors responded to the RFP; Wireless Generation who was eventually awarded the contract and one other vendor. The other vendor proposed a benchmark reading assessment delivery and monitoring system for $5.20 per student; however, the benchmark assessment was not DIBELS, which did not meet the specifications of the RFP.

The small number of responses to the RFP seemed unusual, as did the very specific technical requirements in the legislation. However, based on a conversation with an employee of Dynamic Measurement Group (DMG), the creators of DIBELS appear to have given exclusive rights to one vendor, Wireless Generation, to administer DIBELS on a portable device. Wireless Generation appears to have actively participated in lobbying activities during the 2011 legislative session. This could explain how information regarding technical specifications was available to legislators and eventually incorporated into legislation.

The designation of DIBELS as the benchmark assessment coupled with the very specific technology requirements in the legislation appears to have eliminated all other respondents prior to the issuance of the RFP.

Because of the State's designation of DIBELS as the required assessment and the very specific technology requirements in legislation, it appears that only one vendor, Wireless Generation, could meet the technical specifications and administer DIBELS. This appears to have resulted in the elimination of other competitive respondents prior to the issuance of the RFP.

In our research, we noted one other vendor, VPORT, which supports the electronic administration of the DIBELS assessment; however, we did not find any vendors with software that can be downloaded to a portable device such as a tablet or smartphone, and operate in stand-alone mode. VPORT software does support laptops, which are also portable, but not

smartphones or tablets. VPORT is capable of providing formative assessments and data management and reporting tools; however, no other vendor besides Wireless Generation is able to administer DIBELS on a portable device.

Based on our research with vendors and interviews with various USOE staff and reading specialists at LEAs, there appear to be at least two vendors in the current market that could fulfill the legislation and the Board's intent of administering the DIBELS assessment in an electronic format with reporting and monitoring functions. However, only one can deliver the assessment on a portable device. See further discussion in Chapter IV.

Contract Terms and Periods of Service Creates Confusion

Dollar amounts are not consistent

Sponsoring legislation appropriated $1.75 million in FY2012 and $3 million in FY2013 for a two year total of $4.75 million. The RFP indicated a maximum of $1.75 million would be awarded each year for two years, totaling $3.5 million. The final contract allowed for a maximum of $1.5 million in FY2012 and $2.75 in FY2013, for a total of $4.25 million.

The final contract authorized payments up to $4.25 million, which is $500,000 less than the appropriation for the fiscal years covered.

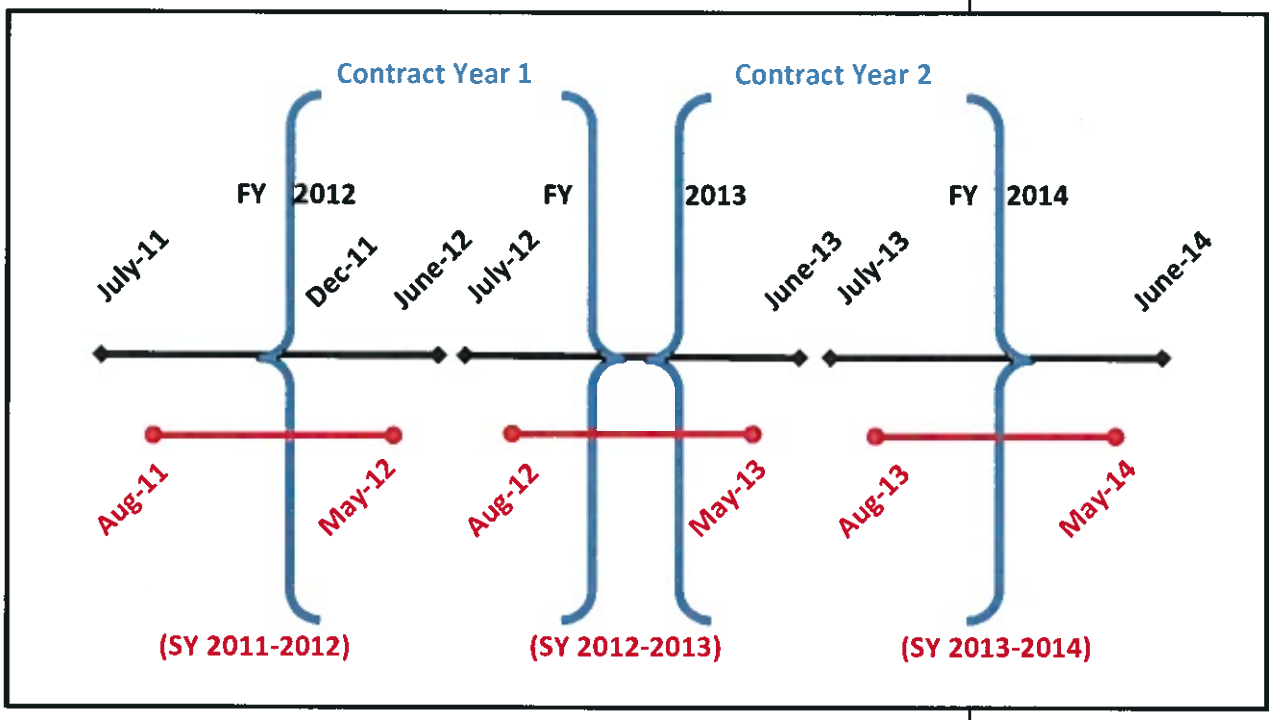
We believe the dollar amount differences and the timing issues noted in the next section create confusion on the part of the USOE and the vendor. This confusion is reflected in various issues surrounding the pricing structure, the invoices submitted by the vendor, and the actual services provided which will be discussed in the next sections.

The contract spans three school years

The statute required availability of the assessment system beginning in school year 2011-2012 (SY2012). The RFP time period covered SY2012 and school year 2012-2013 (SY2013) due to the ongoing nature of the appropriation.

However, the dates on the contract span three school years. The contract began December 15, 2011 and ends December 14, 2013; making it effective for part of SY2012, all of SY2013, and part of SY2014.

Figure 2: The Contract Spans Multiple Periods



The contract did not begin until the middle of SY2012; thus, services were only available for about five months. Services for the first year of the contract totaled $1,104,316 for 54,980 students. Most LEAs that signed up in the first year were only able to use the Wireless Generation program for the end-of-year benchmark reading assessment. Some LEAs were not able to sign up for services and train staff in sufficient time to utilize services for the full five months. Effectively, the State paid the full price per student, for half a years' service, or less depending on the LEA's implementation schedule.

The same issue will arise in SY2014 because the contract ends in December of 2013, which is halfway through the school year. This matter was discussed with Wireless Generation and a resolution has been reached that satisfies both the State and the vendor. See the conclusion at the end of this section.

The pricing structure in the contract is vague

The pricing structure established in the contract for the billing of services is vague. The payment milestones adopted in the contract for both contract years group "students licenses, professional development and account management" into cohorts depending on when students enroll with the vendor. Fees are calculated based on the "total number of students enrolled" in the cohort. This language does not correlate with

Utah's standard enrollment measures and does not designate an enrollment count or date in the contract.

A pricing schedule is included in the contract which discounts the cost per student based on the number of students enrolled. The pricing schedule states that the cost is "per test," which does not correlate to an enrollment measure and further confuses the measurement focus upon which invoices are based.

Figure 3: Pricing Schedule in Wireless Generation Contract

Number of Students	Cost per
0 - 40,000	$22.00
40,001 - 80,000	$20.00
80,001 - +	$18.50

Representatives from Wireless Generation indicated that the "enrolled" number is based on a report from an LEA representative or the Principal of the school participating in the program before the beginning of the school year. Wireless Generation provides software licenses for the number of students requested by the LEA, and bases the amount billed to the State on this number.

Establishing a consistent and accurate measurement for billing purposes is important to ensure proper internal controls over the payments made on this contract. Because the individual LEAs are providing counts to the vendor, and the vendor is providing invoices to the State, it becomes the responsibility of the State to ensure that the number of licenses being requested and used by the LEAs is consistent with the number and amounts being billed by the vendor.

The lack of a defined measurement base in the contract makes this comparison difficult. In SY2012, the State was billed and paid for 54,980 students, but only 53,226 students were assessed, based on Wireless Generation data. This is a difference of 1,754 students. The State was charged $20 per student, in accordance with the established price schedule for less than 80,000 students. See **Figure 3.** The difference of 1,754 students at $20 per student results in a monetary difference of $35,080 between the two measurement bases.

In SY2013, an invoice was submitted for 87,006 students on November 6, 2012 totaling $1,609,611. This invoice did not provide "enrollment" detail by LEA, as it had in the previous year. Upon request, Wireless

Generation provided enrollment and assessment details by LEA as of March 20, 2013. A total of 83,439 students were reported by Wireless Generation as enrolled and 79,287 middle of year assessments were administered. Based on the middle of year data, the number of students invoiced 87,006 is 3,567 greater than the number enrolled. The difference is most likely due to one LEA that cancelled services for the entire LEA after the 2011-2012 school year. The invoiced number of 87,006 is 7,719 greater than the number of students assessed using middle of the year data. At a rate of $18.50 per student, the difference between students invoiced and enrolled equates to $65,990 and the difference between the number of students invoiced and assessed equates to $142,802.

Figure 4: Number of Students Invoiced, Enrolled and Assessed

2011-2012 School Year			
Total K-3 Headcount Oct 1, 2011	# of Students Invoiced	Wireless Generation "Enrolled"	# of Students Assessed
195,098	54,980	54,980	53,226

2012-2013 School Year			
Total K-3 Headcount Oct 1, 2012	# of Students Invoiced	Wireless Generation "Enrolled"	# of Middle of Year Assessments
198,554	87,006	83,439	79,287

The USOE prepared a comparison between the October 1 headcount for SY2012 and SY2013 and the number of students who were enrolled and assessed using the vendor software, as reported by Wireless Generation. The State bases all funding formula calculations on the October 1 headcount. This headcount is audited by independent external auditors and is a consistent and accurate measurement. See Appendix **A** and **B**.

In SY2012, there were 18 LEAs with 646 more students reported as enrolled in the Wireless Generation program than were counted for them on October 1. As of March 2013, in SY2013 there were 12 LEAs with 118 more students reported as enrolled than counted for them on October 1. From the State's perspective this is an issue because LEA enrollment numbers in the vendor's program should be close to their October 1 headcount data.

It is entirely probable that students would enroll in an LEA after the October 1 headcount date and the LEA would enroll them with Wireless Generation. It is also probable that LEA administrators may over estimate or report the number of students they intend to enroll when signing up for Wireless Generation services. The USOE should be reviewing the data provided by the vendor and following up with LEAs who are over enrolling or over projecting licenses needed to ensure the most effective use of State resources. LEAs who are enrolling more students than they plan on assessing are essentially purchasing software licenses which are not being used.

The differences identified between the number of students invoiced, the number of students enrolled, and the number of students assessed does have an impact on the total amount billed to the State. Presently, the USOE does not collect independent data from the LEAs to validate the number of students enrolled or assessed in the Wireless Generation program. A reconciliation between vendor data and LEA data is a critical element when reviewing and approving payments to vendors.

The vendor relies on the enrollment numbers provided by the LEAs to plan for professional development, customer and software support personnel, and other tangible costs such as servers and equipment. An estimate at the beginning of the year is critical to their ability to fulfill the terms of the contract with the State. This matter was discussed with Wireless Generation and a resolution has been reached that satisfies both the State and the vendor. See the conclusion at the end of this section.

Unclear professional development deliverables

Payment milestones in the contract include not only student licenses, but professional development. The contract states the vendor will provide up to 48 two-day trainings sessions in year one and 32 two-day training sessions in year two, each with a maximum of 25 participants. Data provided by Wireless Generation, see **Figure 5**, indicates a significant amount of training has been provided in SY2012 and SY2013.

However, the session descriptions set forth in the contract do not agree to the sessions delivered by the vendor. The RFP request for the vendor to provide a "per-student per-year" price is the major cause of the differences between the contract terms and the deliverables. It is difficult to unbundle a package price and achieve direct correlation with estimates. It is apparent that the vendor has made a significant effort to provide training in many formats. However, the contract terms and the deliverables do not align. If a dispute were to arise, it may be difficult to

ascertain whether the vendor has fulfilled the training requirements set forth in the contract.

Figure 5: Professional Development Sessions Delivered by Wireless Generation

Professional Development provided through 3/30/2013	School Year	
	2011-2012 Sessions	2012-2013 Sessions
1 Day On-Site Training of Trainers	21	13
1/2 Day Product Training Web Conference	3	4
1/2 Day On-Site Product Training	23	87
Master Training Session	1	1
Summary	48	105
# of Attendees 3,428		

Summary

The various issues identified in this chapter surrounding the periods of service, pricing structure, and invoicing resulted in great confusion on the part of USOE and the vendor. Confusion only made it more difficult to try to manage expectations of service and performance and ensure that invoices and payments are in compliance with the established contract and statute. Concerns over the vague terms in the contract are heightened because the contract expires at the end of 2013. If the current contract is extended with the present terms, as provided for in the contract, these issues will only be perpetuated and the State will continue to pay for services in excess of the services being provided.

Conclusion

The USOE discussed the contract terms with representatives of Wireless Generation and a contract amendment is presently being negotiated which is mutually beneficial to both parties and addresses all issues noted in the previous chapter. Contract amendments include the following:

1. An extension of the contract through June 30, 2014 to ensure a full year of service will be available to all LEAs enrolling with Wireless Generation for SY1014.

2. Wireless Generation will credit the State $405,320 against services delivered in SY2014. This is reflective of the full year of service invoiced and paid in SY2012 when only services were available for 5.5 months.
3. For purposes of invoicing: (dates to be determined)

   A. Wireless Generation will provide the State a listing of students enrolled by LEA or individual schools for SY2013. The USOE will provide the final October 1 headcount for participating schools or LEAs and Wireless Generation will prepare a revised invoice for SY2013.

   B. For SY2014, Wireless Generation will provide a listing of participating LEAs or individual schools. The USOE will provide the final October 1 headcount for SY2013.

   Wireless Generation will prepare an invoice based on prior year headcount data. USOE will provide Wireless Generation SY2014 October 1 headcount data when it is final. A reconciliation will occur and an invoice or refund will be processed based on negotiated difference thresholds.

USOE Recommendations

1. Establish a process to reconcile the number of students invoiced to the October 1 headcount data for use in the annual contract payment authorization process.
2. Establish a process to reconcile the number of students enrolled and assessed to ensure LEAs are not over enrolling students.
3. Evaluate the contracting process at the USOE and develop monitoring tools to evaluate future contracts prior to execution.

Chapter II Utilization

Enrollment in Wireless Generation Program

In SY2012, there were 98 LEAs, 41 school districts and 57 charter schools, with a total of 195,098 K-3 students. Of the 98 LEAs, 22 school districts and 20 charter schools, or approximately 43% of LEAs, had enrolled with Wireless Generation. Based on Wireless Generation data, 53,226 students were assessed using the Wireless Generation program which reflects only 27% of eligible K-3 students.

Benchmark assessments were administered using the Wireless Generation program for 27% of all K-3 students in year 1 and 40% in year 2.

In SY2013, the second year of the two-year contract, there were 103 LEAs, 41 school districts and 62 charter schools, with a total of 198,554 K-3 students. Of the 103, 27 school districts and 41 charter schools, approximately 66% of eligible LEAs, have enrolled with Wireless Generation. Based on Wireless Generation data, 79,287 students were assessed using the Wireless Generation program which reflects 40% of eligible students.

Figure 6: Utilization by LEA and Number of Students Assessed

	School Year	
	2011-2012	2012-2013
# of LEAs with K-3 Students	98	103
Enrolled with Vendor	42	68
% Using Vendor Software	43%	66%
# of K-3 Students	195,098	198,554
Students Assessed with Vendor Software	53,226	79,287
% of Students Using Vendor Software	27%	40%

The increase of approximately 13% in students being assessed using the Wireless Generation system appears a modest increase, and we do not expect significant growth in year three based on the following factors:

1. Three school districts, Alpine, Canyons and Uintah, have requested and received waivers allowing them to use a reading assessment other than DIBELS. Each LEA has provided evidence that the assessment used provides comparable results to DIBELS and fulfills the benchmark assessment requirement established by statute. K-3 students in these three LEAs totaled 36,217 in SY2012 and 36,940 in SY2013. These LEAs will not utilize the Wireless Generation State contract, as it is currently written, because of their choice to use an assessment other than DIBELS.

2. Some LEAs have expressed the desire to have all elementary students (K-6) assessed using the same benchmark assessment. While these LEAs use DIBELS as their benchmark assessment, this State contract and other K-3 reading improvement funds can only be used for K-3 students. Some of these LEAs have purchased other DIBELS electronic assessment software, for less than $18.50 per student. Some of these LEAs decided to purchase an assessment other than DIBELS.

3. LEAs have expressed concerns regarding costs. Some LEAs indicated that the present program is too costly to maintain without State support. These LEAs indicate that local resources are not sufficient to sustain this program and they are unwilling or unable to devote time and resources to switching systems and training teachers and aides on a program they have no assurances will continue to be funded in the future. Some LEAs have expressed concern at the high cost of the Wireless Generation program in general, citing other vendors who provide comparable software for costs ranging from $1-$5 per student assessment. Other LEAs expressed concerns about the cost of purchasing devices to administer the tests.

Although over 50% of LEAs have enrolled in Wireless Generation that is not necessarily reflective of total number of schools or students using the program. **Appendix A and B** provide a comparison between the K-3 students at an LEA and the numbers that have been enrolled and assessed for both school years.

Twelve LEAs have had such a positive experience with the Wireless Generation software that they used local revenues to purchase additional services for fourth, fifth, and sixth grades or some combination of these grades, for selected schools. Seven LEAs have purchased add-on resources in addition to the current vendor package for selected schools.

Utilization of tools in Wireless Generation Program

The contract with Wireless Generation includes professional development, the mCLASS platform on which DIBELS is administered, monitoring reports and the Now What tool. The Now What tool includes Small Group Advisor, which uses results from the assessment to form groups of students with similar needs. The Item-Level Advisor highlights important patterns in the assessment and offers suggested next steps for an individual student. Home Connect allows teachers to print reports for parents that will show assessment results and offer specific activities to bolster student learning at home.

Wireless Generation provided the USOE SY2013 LEA data as of October 2012 showing 43 of 68 LEAs accessed the Now What tool and 42 LEAs accessed the Small Group Advisor tool. This amounts to more than 60% of the 68 participating LEAs that are using the tools included in the software contract. These tools are basic indicators and grouping tools that teachers and administrators can use to identify issues and group students by these issues. In addition, 35 of 68 LEAs printed Home Connect letters, another feature provided by Wireless Generation to inform parents of student test scores. The letters to parents give very basic ideas for informing parents how to help students read.

The contract does not include access to Burst Reading, Wireless Generation's literacy intervention program. Literacy specialists surveyed valued the reports generated by the software and the progress monitoring features, which are supported by the utilization of the included monitoring tools. One assessment director indicated that the data reporting and analysis features are tools that enable teachers to better focus their time on interventions.

Utah's Contract Compared to Other Contracts

The State's current contract provides for a graduated rate of $22.00-$18.50 per student or a maximum of $2.75 million over the contract term. This graduated rate is intended to provide the State with a discount for a larger number of students using the software. This price includes professional development and access to the Now What tools.

Park City School District purchased Wireless Generation software for their K-6 students at the beginning of SY2012. The District purchased services for 1,221 K-3 students and 1,002 4-6 students and paid approximately $16.07 per student. The District's contract included installation and a training session, but not the Now What tools. When the State contract was finalized, Wireless Generation placed a credit in the District's account for the K-3 licenses purchased as well as the training and installation costs. Wireless Generation then included all K-3 students in the first year billing to the State. The final "price per student" of $16.07 is less than the lowest price bracket as negotiated by the State in the RFP but does not include the Now What tools.

South Sanpete School District purchased services for grades 4 and 5 for three elementary schools. The District paid $14 per student for 529 students in SY2013.

Millard School District purchased services for the fourth grade in two elementary schools. The District paid $14 per student for 215 students in SY2013.

Wasatch School District purchased services for fourth grade in four elementary schools. The District paid $14 per student for 411 students in SY2013.

For South Sanpete, Millard, Wasatch or Park City School Districts, the price quote of $14 or $16.07 included the mCLASS software, but did not include the Now What tools, nor any professional development. It is reasonable to conclude that all of these LEAs had access to the training provided through the State contract for the K-3 grades enrolled with the vendor, and this training most likely translated directly to the additional services purchased for grades 4-6.

Through a public records request, we were able to obtain the current contract between New Mexico and Wireless Generation. We calculated the price per student at approximately $16.69, based on enrollment data found on the State of New Mexico's website. There were 106,620 K-3 students in SY2013. This contract included the software subscription, program management, training and technical support.

Wireless Generation representatives indicate that the scope of professional services provided to New Mexico was substantially less in value than those provided to Utah. Without additional data, we are unable to quantify the value of the differences in these services. New Mexico's per student rate was calculated for their entire K-3 population. To ensure comparability if Utah's participation rate was 100% the price per student would have been approximately $13.85, which is $2.84 lower than the calculated New Mexico price for SY2013.

Conclusion

Sixty-eight LEAs or 66% of the 103 LEAs have signed up for services with Wireless Generation in SY2013. These LEAs appear to be utilizing the services provided. However, Wireless Generation services are only being utilized by 40% of the entire K-3 population in the State.

All four LEAs we contacted purchased services from Wireless Generation. These entities paid between $2.43-4.50 less per student than the State's negotiated price. The Utah LEAs that purchased additional services for

grades 4-6 did not get the Now What tool, nor did they receive any additional professional development services. However, each LEA had access to the professional development services provided in the State contract.

New Mexico's contract appears to be comparable to Utah's except in the case of professional development; however, without additional data we are unable to quantify the value of the differences in these services. At 100% participation, Utah's price per student would be $13.85, which is $2.84 lower than the $16.69 calculated price for New Mexico.

We are unable to break out the price for mCLASS licenses, the cost of professional development, and the cost of the Now What tool using the existing contracts. These are part of the comprehensive "per-student per-year" price required by the RFP. The LEAs that purchased mCLASS licenses without professional development or the Now What tools paid $14 per student. New Mexico purchased services for all K-3 students for approximately $16.69 per student, but received less professional development services. Utah's contract provided for mCLASS licenses for all K-3 students, the Now What tools, and robust professional development at a cost not to exceed $2.75 million for SY2013.

The pricing schedule for Utah is on a sliding scale, which provides discounts for more students enrolled. Utah does not mandate participation. Because the number of students enrolled in the program is only around 40% of the total eligible students, Utah is paying $18.50 per student for service. Utah would need to enroll approximately 148,649 students to achieve the $13.85 per student price. That is an additional 69,363 students or an increase of 47% over current enrollment to achieve the maximum discount provided in the contract.

Chapter III What is DIBELS?

As part of this audit, we conducted a survey of Literacy Directors or their equivalent from nine LEAs, seven districts and two charter schools, which is approximately 10% of the LEAs using Wireless Generation, although not all LEAs surveyed were using the program. The purpose of this survey was to gain information from the individuals who actually administer DIBELS and use various data management and reporting systems. The number of survey participants was not intended to be a sample representative of the population. We selected LEAs who currently used the Wireless Generation program, some that did not, and one who has used Wireless Generation and switched back to their previous software provider. We asked a variety of questions regarding the administration of DIBELS, data management and reporting systems, and types and costs of interventions. We also inquired about the methods used to administer DIBELS, time spent administering DIBELS, how the LEA would spend new unrestricted funds toward improving reading levels, and the use of reading specialists and aides. Responses to this survey are used throughout this report.

Additionally, data and comments were obtained from a survey conducted by the USOE assessment division in May 2012. This survey was sent to all LEAs. Forty of the LEAs responded to this survey.

We attended a public forum sponsored by a member of the Utah Legislature where discussion and comments were taken from the audience regarding user's feelings on the technology and software being used in Utah schools. DIBELS administration systems and progress monitoring software systems were discussed by audience members at the forum. We also visited a school district to view the Wireless Generation software, and observe how DIBELS is being administered and reading achievement is being tracked using data provided by the program.

Manually administering DIBELS takes approximately 5-10 minutes per test, per student.

Background on DIBELS

Prior to 2011, many LEAs administered DIBELS using a traditional paper and pencil method. In this traditional method, a teacher or other test administrator sits with each student and tests indicators such as first sound fluency, phoneme segmentation, nonsense word fluency, and oral reading. Tests are usually timed and run 1 minute, such that on average, each child is tested three times a year with each testing session taking approximately 5–10 minutes. The test length varies somewhat

depending on the grade and time of year, with the mid-year test usually the most extensive.

After administration of the test, the teacher manually scores the results and enters student data into a computer system to track student scores. Some LEAs entered scores into Microsoft Excel, while other appear to have used one of several data management and reporting systems that support DIBELS, store student assessment results, and generate reports. LEAs who do not administer DIBELS as their benchmark reading assessment use a diagnostic assessment system that supports their benchmark assessment.

With the adoption of the State contract in 2011, the scoring and data management process changed for those that enrolled with Wireless Generation. The actual administration of DIBELS remains the same. Each student uses a hard copy of the DIBELS materials and the test is still administered teacher to student. Instead of marking student results on the testing sheet, the teacher records student responses directly on an electronic device such as a tablet or mobile device. Test scores are calculated by the assessment software and are uploaded to the Internet for use in data management and reporting.

Our research indicates that assessments administered electronically have the potential to produce more accurate and consistent results over time. Time limitations on tests are more strictly enforced because a software program will not allow input after the expiration of time and human scoring tabulation errors are eliminated.

Testing materials for the DIBELS test can be downloaded free of charge. These materials can be used for multiple children. If the test is administered with the pencil paper method, a scoring sheet is also required. The cost of printing the test and score sheets is approximately $2-$3 per child. Testing materials were not included as a part of the Wireless Generation contract.

Testing materials can be purchased from a vendor that charges $39-$58, per class, depending on grade. Advantages to purchasing DIBELS materials include easy-to-use flipbooks of student testing materials and assessor directions. These materials are usually sturdier and last longer than printed copies.

Administering DIBELS Electronically Saves Time

One of the principal reasons for funding a diagnostic assessment contract to administer DIBELS was the fact that it had the potential to save teachers and administrators' time when administering and scoring the required benchmark assessments. The time needed to administer the test using either the paper and pencil method or the portable electronic device is virtually the same, on average it takes 5-10 minutes.

The LEAs, we surveyed, indicated that when administering DIBELS manually the time spent calculating test scores and entering assessment averaged 3-5 minutes per student, per test. That equates to approximately 15 minutes per student per year to administer the 3 required assessments at the beginning, middle, and end of year. When DIBELS is administered on an electronic device, test scores are calculated by the software and uploaded into the data management system.

The elimination of manual scoring and data input saves teachers the most significant amount of time. However, not all data input is eliminated, teachers do have to input and sync individual student data fields into the software prior to administering DIBELS.

Based on data published in the Superintendent's Annual Report for the 2011-2012 school year, the average class size is 22 and the median teacher compensation (salary and benefits) is $59,555 a year. Teacher contracts average about 185 days, 8 hours a day, which equates to approximately $40.24 an hour.

It appears that administering the benchmark assessment on an electronic device saves the test administrator approximately 5.5 hours per year when administering the benchmark assessment 3 times, as required by statute, to a classroom of 22. See calculation in **Figure 7**. At an average hourly rate of $40.24, this equates to a time savings valued at $221.32 per teacher per year. The time saved can be utilized towards progress monitoring, intervention measures, and other areas teachers and administrators deem appropriate. The time saved increases in larger class sizes, and with each administration of the benchmark assessment. In a classroom of 30, a teacher saves approximately 7.5 hours which is valued at $301.80.

Figure 7: Estimate of Time Saved by Classroom Teacher Administering Three Required Benchmark Assessments Electronically

Classroom Size	15 Minutes per Student/per Year)	Hours Saved Per Year, Per Classroom
22	330	5.5
24	360	6
26	390	6.5
30	450	7.5

If the three required benchmark assessments were administered to all 198,554 K-3 students in SY2013 using an electronic assessment system, the potential system time savings equates to approximately 49,639 hours which is valued at $1,997,473.

Figure 8: Dollar Value of Time Saved By Administering Three Required Benchmark Assessments Using Electronic System in SY2013

	# of K-3 Students	Minutes Saved Per Student, Per Year	Hours Saved Each Year	Dollar Value Savings ($40.24 Hourly Rate)
Oct. 1 2012 USOE Headcount	198,554	15	49,639	$1,997,473

There is no argument that time is saved by using an electronic device to administer State benchmark assessments. If teachers use the benchmark assessment as a progress monitoring tool, the potential for time savings in the classroom increases with each administration.

Does Assessing DIBELS Electronically Translate To Reading Gains?

Utah Code 53A-1-606.6 indicates the intent of the Legislature is to (1) improve K-3 reading proficiency; (2) provide focused interventions; (3) inform parents of interventions the schools are providing; and (4) inform parents of interventions they can use at home. Given the language in statute, it appears the Legislature believed having a diagnostic assessment system would improve the reading proficiency of students.

Literacy experts recommend that a diagnostic assessment tool should be used in conjunction with a screening assessment tool. When a student is identified by a screening assessment as reading below grade level, a diagnostic assessment is often used to provide educators with specific information about the nature of the students' reading difficulty. For instance, when a patient arrives at a doctor's office and has their temperature taken, the temperature is a screening assessment administrated with a thermometer: it indicates there is a problem with the patient's health. The doctor then performs additional diagnostic measures to determine the cause of the temperature and prescribe appropriate treatment. Research indicates that DIBELS is an effective screening tool for assessing the acquisition of early literacy skills from kindergarten through sixth grade.

DIBELS was designed for use in identifying children experiencing difficulty in acquisition of basic early literacy skills in order to provide support early and prevent the occurrence of later reading difficulties. Diagnostic assessment tools may then be used to provide educators with additional specific information for developing instruction targeted to the needs of the individual student. The administration of DIBELS helps to identify the students who need assistance. A diagnostic assessment should then be used to identify specific literacy needs and inform the educator who then provides appropriate interventions to improve reading proficiency.

DIBELS is an effective screening tool, not a diagnostic assessment.

Literacy experts at the USOE inform us that an intervention is intended to prevent struggling students from falling farther behind their peers. Targeted instruction provided *in addition* to the regular classroom instruction should be focused on specific literacy needs, as identified by a diagnostic test. Effective interventions will accelerate a student's literacy skills attainment to grade level and improve a student's future educational trajectory.

Administrating the State approved assessment (DIBELS) using a portable electronic device is helpful in providing accurate and timely data about student performance. Using a portable device helps educators maintain fidelity of time limits, makes data upload and analysis more efficient, and encourages progress monitoring to track progress between the three required benchmark assessments. This information will help educators plan more effective instruction.

Progress Monitoring and Data Analysis Time-Savings

Wireless Generation representatives provided data indicating that other progress monitoring assessments, aside from the benchmark

assessment, are being used by Utah teachers. These progress monitoring assessments are a single 60 second measure that can be used by teachers throughout the year to continually monitor the progress of students identified as needing assistance.

Based on data from Wireless Generation as of April 3, 2013, there were 40,564 unique students who were administered a total of 279,725 progress monitoring assessments, or approximately seven assessments per student over the seven month period. Wireless Generation estimates that each progress monitoring assessment equates to a two minute time savings per assessment. If these results are annualized, it results in 12,169 hours saved over a nine month school year. At an average hourly rate of $40.24, time saved is valued at $489,688.

Assessment directors, principals, and other users of the assessment results indicate that the immediate data provided by the Wireless Generation program enables teachers and principals to group students by similar intervention needs, to quickly analyze patterns, and to monitor student progress through the year and between years. The reports provided by the Wireless Generation program are very user friendly and enable the user to drill down to individual student test results. The additional tools provided in the State's subscription provide links to lesson plans and other intervention tools. Immediate access to this data also saves time in the classroom and with administration. Time could then be spent on group or one-on-one interventions.

Comparable data is not yet available

Statute requires an evaluation of the effects of the diagnostic assessment system by comparing the learning gains of students that use the diagnostic assessment system against those who are not using the system. We were unable to complete this analysis because comparable data is not yet available. This report is due to the Public Education Appropriations Committee by November 2013.

Conclusion

As we conducted our research and interviewed USOE and LEA's literacy experts, it appears that the intent of enabling legislation was focused solely on the acquisition of a system to administer benchmark assessments electronically. The legislation is titled "diagnostic assessment system" but a true diagnostic assessment system is much more than a screening tool. Literacy experts explain that a true diagnostic test can take anywhere from 45 minutes to a few hours to administer. Diagnostic tests and tools are targeted intervention

measures aimed at helping individual students who have been identified in a screening process as needing additional assistance.

The products offered by many of the software vendors, including Wireless Generation, are not intended to be intensive diagnostic systems. Students do not use these products to improve their reading skills, and these systems cannot be used to administer targeted intervention measures to individual students.

Programs such as Wireless Generation are designed for teachers and administrators who value time saved in the classroom. These software programs enable electronic administration and scoring of the benchmark assessment, deliver reports and analysis tools which enable teachers to target instruction and interventions, and provide progress monitoring measurements and tools.

We noted many positive comments from LEAs who use the Wireless Generation program and value the ease of administering the DIBELS test electronically and the speed at which assessment results are available for analysis. Progress monitoring tools are also a very valued feature among the users.

We also noted many positive comments from LEAs who use software products from other vendors, which are not paid for under the State contract. These LEAs also have the ability to administer the benchmark electronically and summarize and categorize data. The ability to monitor progress and contact parents using electronic tools was not mentioned, and may not be available in other software products.

We believe there is sufficient evidence to demonstrate that the electronic administration of the benchmark assessment, progress monitoring, and data reporting saves educators and the public education system as a whole time and improves the accuracy of assessment results. However, the use of these software programs will not translate into substantial reading gains for students reading below grade level without an additional investment of teacher or other paraprofessional time to administer targeted interventions and provided individual coaching.

Chapter IV Ongoing Funding

Present Utilization of Funds

Since FY2012, $4.75 million has been appropriated for this contract. A total of $1,104,316 has been spent. We anticipate that the SY2013 invoice will be approximately $1.5 million when settled in the next month, and a credit will be applied to the SY2014 invoice totaling $405,320. The 2013 session reduced the annual appropriation to $800,000 for FY2014.

This leaves a fund balance of approximately $3,350,000 available in FY2014. The fund balance is non-lapsing, and the fiscal note indicated that the USOE could use up to $100,000 for administration costs. We reviewed the accounting records at the USOE and determined that these funds have been coded and segregated separately from all other funds, and no other expenditures, aside from the payment to Wireless Generation has occurred.

Enrollment estimates for SY2014 indicate estimated growth of 2.2%, or approximately 202,922 K-3 students in SY2014. We estimated the cost of the contract, if enrollment in the Wireless Generation program remains consistent, at 40% or increased to 50%. We also estimated the time savings value of administering the required three benchmark assessments electronically. Added to the time value estimate is an approximation of the monetary value of the progress monitoring tools and assessments which are separate from the benchmark assessment and may be unique to this vendor. These amounts are based on an estimate provided by the vendor, and were increased to reflect an annual value and increased utilization based on increased student enrollment. See **Figure 9**.

Figure 9 Cost vs. Time Saved: Estimated SY2014 Enrollment

Number of K-3 Students SY2014 202,922						
Cost			Time Saved			
Enrollment Level	Students	Cost Per Year ($18.50)	3 Benchmark Assessments (15 min student) Hours saved	Value in $ ($40.24)	Progress Monitoring	Total Value
40%	81,169	$1,501,627	20,292	$ 816,550	$ 480,137	$ 1,296,687
50%	101,461	$1,877,029	25,365	$ 1,020,688	$ 600,170	$ 1,620,858

Keep in mind the more times the benchmark assessment or other progress monitoring tools are utilized, time saved in the classroom increases, and therefore the value of the benefits provided by Wireless Generation increases. Unlimited use of progress monitoring tools and assessments are included with each subscription to the program.

Classroom Instruction and Interventions

Based on discussions with USOE reading specialists and classroom teachers, the amount of time spent in the classroom and on interventions by teachers, reading specialists, or other paraprofessionals varies depending on the student and the resources available to the school.

A teacher in the Salt Lake School District indicated that on average students in her classroom test 25% at benchmark, 50% below benchmark, and 25% well below benchmark.

Students assessed at benchmark are given a monthly progress monitoring assessment or exercise, and their skills are maintained through regular classroom instruction.

Students assessed at below benchmark receive a progress monitoring assessment or exercise every other week, and an average of 30 minutes a week of individual or small group work is provided. Over a 37 week school year, this equates to approximately 19 hours of intervention, in addition to classroom instruction. This additional intervention time is valued at approximately $765 a year, per student.

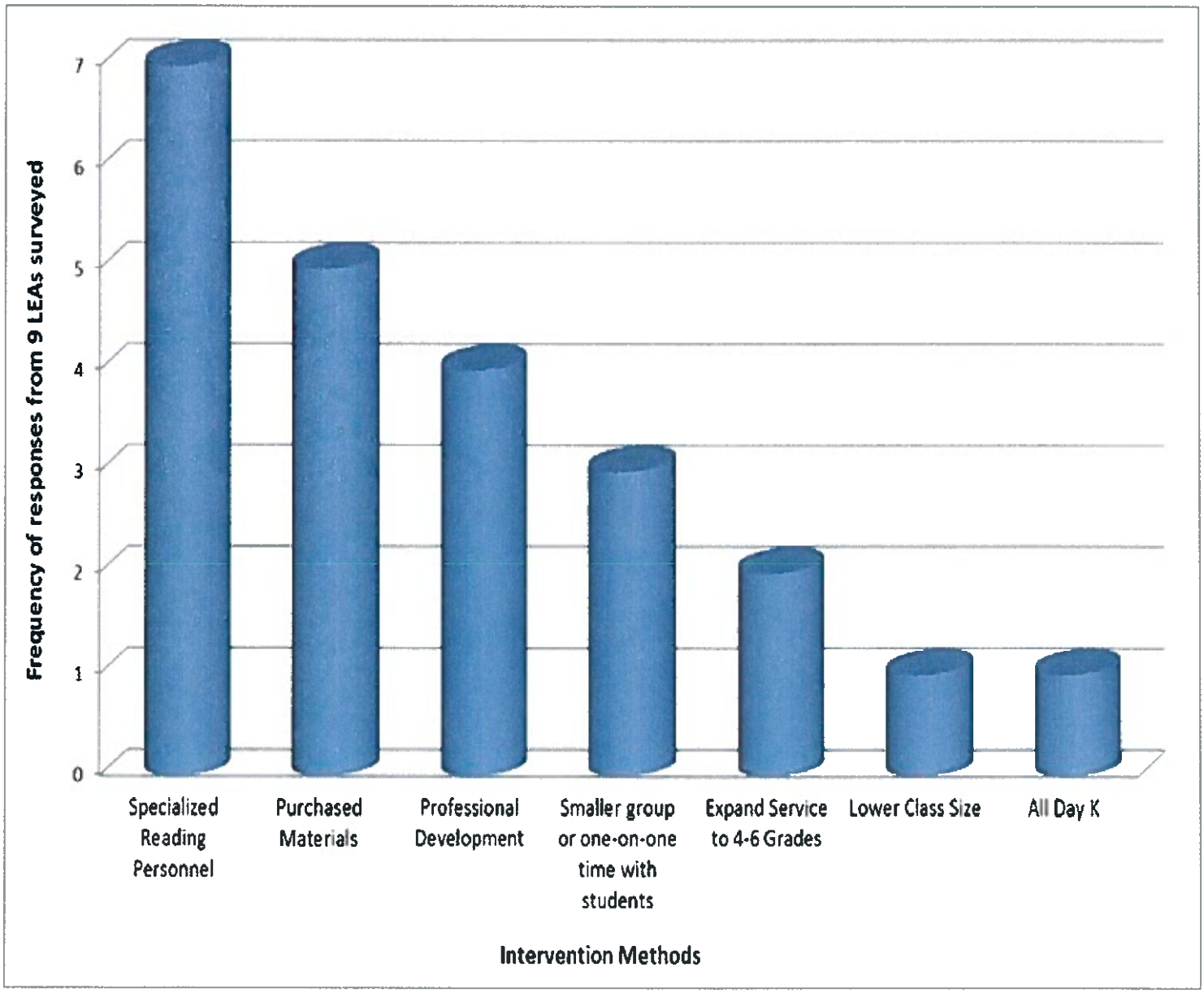
For those students well below benchmark, they also receive a progress monitoring assessment or exercise every other week, and an average of 45-60 minutes of individual or small group intervention each week. Over a 37 week school year, this equates to between 28 to 37 additional hours of intervention, with a value between $1,127-$1,489, per student.

Similar estimates of progress monitoring activities were provided by the Provo School District. The Provo School District indicates that students assessed at benchmark are progress monitored every 4-6 weeks. Students assessed at below benchmark are progress monitored every two weeks, and those well below benchmark receive weekly progress monitoring.

This legislation seems to focus solely on the electronic administration of the benchmark assessment, and while a critical piece of the overall reading improvement strategy, does not appear to be the pivotal element to ultimately improve reading proficiency.

In our survey of nine literacy directors, we asked how each LEA would spend new unrestricted funds to improve reading proficiency. Responses indicated hiring more reading aides, specialists, and coaches and training them to work in small groups and one-on-one with students would improve reading levels the most. All LEAs surveyed already have some paraprofessional reading aides at either the LEA or individual school level and some certified reading specialists. Several of the LEAs surveyed indicated that professional development for teachers is critical because it enables school personnel with specialized knowledge to teach reading and administer interventions. **See Figure 10.**

Figure 10: Responses of 9 LEAs surveyed on how unrestricted or new K-3 monies would be spent to improve reading proficiency



Comparable vendors and associated costs

We reviewed various vendor websites, contacted vendors, and inquired of LEAs regarding assessment administration and data management and reporting software. All vendors reviewed support a data management system with the ability to report scores by student and classroom, as well as other reports. We primarily reviewed vendors that support the DIBELS assessment. Vendors that do not support the DIBELS assessment were also reviewed.

We noted two vendors, Wireless Generation and VPORT, which have programs which facilitate the electronic administration and scoring of DIBELS and the automatic uploading of the student data into a data management and reporting system. We noted another vendor, DMG, which sells a data management and reporting system; however, the DIBELS test must still be administered and scored manually and data must be manually input into the tracking system. Each program has different features, which may not be exactly comparable; however, all three programs allow for administration and tracking of "between benchmark testing" called progress monitoring.

Figure 11: Comparison Of Vendors Who Support DIBELS

Vendors Who Support DIBELS	Data Management and Reporting System?	Test Administered via Electronic Device?	Cost, Per Student?	Cost for all K-3 Students SY2013 198,554
Wireless Generation	Yes	Yes	$14.00*	$2,750,000
VPORT - Data Management and Online	Yes	Yes	$1.95	$387,180
Dynamic Measurement Group (DIBELSnet)	Yes	No	$1.00	$198,554

*The Wireless Generation price used for comparison purposes is $14 because that is the price paid by LEAs who only purchased the mClass software with no additional professional development services and without the Now What progress monitoring tools. At $14 per student, the total would be greater than the maximum of $2,750,000 negotiated in the current contract, thus the maximum contract total is included for comparison purposes.

Wireless Generation allows for administration of DIBELS on handheld portable devices. VPORT only serves electronic devices with screens greater than 11 inches in size, such as laptops, which are portable in nature, but are not generally considered handheld portable devices with

touch screens. Because VPORTs capabilities do not technically serve "portable devices" that operate in stand-alone mode, they potentially do not satisfy the current statutory requirements.

In our survey of nine LEAs, LEAs placed emphasis on different features of the data management and reporting systems. Most LEAs surveyed appreciated the time saving aspects afforded by administrating the benchmark assessment electronically as well as the automatic scoring and uploading of data. Others indicated that the automatic scoring reduced human calculation errors and produced more accurate test results. Some LEAs found the data management tools that allow for reporting and tracking of results to be the most desirable feature in the software program. One Literacy Director at a charter school loved the capabilities of the Wireless Generation program, in part, because the school had never used an electronic assessment system for DIBELS, and had previously tracked progress using Microsoft Excel.

The costs of purchasing devices to administer DIBELS and the high cost of the Wireless Generation program are barriers to Statewide adoption.

One LEA indicated that it was costly buying iPod touches and iPads for teachers to administer the assessments using the Wireless Generation program. Two LEAs expressed concerns about the high cost of the program and indicated that without State funding they would not use a program such as Wireless Generation.

Some LEAs have not utilized the Wireless Generation State contract, choosing instead to purchase other vendor products. Some provide some of the same types of services as Wireless Generation, but at a lower cost per student price. Some of these programs allow for electronic administration of DIBELS, others are data management and reporting systems only. Based on responses from our survey, Wireless Generation and Data Management Group are the two most popular vendors for DIBELS in Utah.

Vendors Who Support Other Benchmark Assessments

Alpine, Canyons, and Uintah School Districts have elected to use systems which support other benchmark assessments they feel are more robust. Uintah uses EasyCBM, Alpine uses DRA, and Canyons uses Aimsweb. In fact, LEAs in Utah are currently using or have used all of the vendors listed in ***Figures 11 and 12.*** Aimsweb, Easy CBM, and DRA all support electronic administration of their assessments as well as provide data management and reporting tools.

Figure 12: Comparison of Vendors Supporting Other Assessments

Vendors that Use a Reading Assessments Other Than DIBELS	Data Management and Reporting System?	Test Administered via Electronic Device?	Cost, Per Student?	Cost for all K-3 Students SY2013 198,554
Aimsweb	Yes	Yes	$4.00	$794,216
EasyCBM (also includes Math)	Yes	Yes	$4.00	$794,216
Developmental Reading Assessment (DRA)	Yes	No	~$3.03	$601,619
Developmental Reading Assessment (DRA)(iPad App)	Yes	Yes	$12.00	$2,382,648

Present Funding of the K-3 Reading Improvement Program

The K-3 Reading Improvement Program began in 2004 with an ongoing appropriation of $12.5 million, and a one-time appropriation of $2.5 million. Since 2004, enrollment has increased by 26%. See **Figure 1**. In school year 2004-2005, there were 40 school districts and 10 charter schools participating. The appropriation remained at $12.5 million until FY2008, and then increased to $15 million where it has remained, with the exception of a $300,000 reduction in FY2011. In school year 2012-2013, there were 41 school districts and 85 charter schools participating.

Virtually, the entire state appropriation has been expended each year. Additional State funding was directed towards the same target student group when the contract for the diagnostic assessment system was established in 2011. However, unlike the K-3 Reading Improvement Program funds, the contract funds have not been fully expended.

Utah has limited resources; however, the targeted student population and the number of LEAs continue to grow. Based on our research, it appears than an optimal mixture of funding to provide for an electronic assessment, data reporting and analysis, and progress monitoring system, combined with adequate funding for reading coaches, aides, and intervention measures would result in the most successful combination to result in reading gains.

Of the LEAs surveyed, many indicated that the administration of DIBELS alone will not translate directly into reading gains. Literacy specialists

instead place emphasis on targeted interventions. The use of a program that administers the assessment electronically, and delivers data quickly enables classroom teachers and administrators to develop intervention strategies, based on actual data, and better informed instruction in the classroom. Classroom instruction and individual intervention methods require additional personnel time, which is why most LEAs indicated they would hire additional personnel in the form of certified reading specialists or trained reading aides if additional unrestricted funding were available.

There are many vendors in the current market that provide various levels of electronic assessment features, data management and reporting tools, and intervention tools. The current contract allows LEAs to access the Wireless Generation program, which costs the State $18.50 per student per year. If all LEAs utilized this contract, and all K-3 students were utilizing the Wireless Generation program, the current contract provides for the State to pay $13.85 per student.

At the present level of funding, the State has a sufficient fund balance to maintain service through the end of the contract in SY2014. If services cost approximately $1,500,000 in SY2014, a restricted fund balance of approximately $1,850,000 would remain. At the present appropriation level of $800,000 per year and estimated costs of $1,500,000 a year, the State would be able to provide services through SY2016 and have approximately $1,250,000 available in SY2017.

At the present level of enrollment, about $1 million remains unexpended in fiscal year 2015, which decreases through fiscal year 2017. Because of the restricted nature of the appropriation, these funds cannot be used in the K-3 Reading Improvement Program, or for any other purpose than to pay for the diagnostic assessment contract. At the present enrollment rate, only 40% of the State's K-3 students are being served by this contract.

When the contract expires in SY2014, it is likely a new RFP will be issued. At the present appropriation level, it is unlikely that funding will be sufficient, after the use of the unexpended fund balance, to sustain the present enrollment levels at the present per student price. Because the Board has designated DIBELS as the required assessment, and statute contains specific technical specifications, a new RFP may again result in only one respondent who can meet both the DIBELS and the technical specification requirements.

Some LEAs have already invested in other vendor programs. The Legislature and Board could also allow for a reimbursement program for LEAs that elect to not use the State system and establish a reimbursable rate consistent with the rate charged by the selected vendor.

There is sufficient evidence to conclude that some combination of a data management and reporting system and more school level personnel has the greatest potential to significantly impact the goal of reading proficiency for all K-3 students. The reduction of the appropriation to $800,000 further necessitates a reexamination of the expenditures of this contract. While the State does have a fund balance to continue this contract through SY2014 without interruption, future RFPs will need to consider the reduced appropriation and available funds.

Conclusion

We identified several concerns surrounding the contract arising from HB 302 which was enacted in *Utah Code* sections 53A-1-606.5-7 and 53A-17a-150 in 2011. One pre-eminent concern is that the specificities of the statute appear to have eliminated competition for the RFP. The contracting processes resulted in terms and deliverables that are vague and difficult to measure. Presently, enrollment in the vendor program is not large enough to fully expend the ongoing appropriation each year, nor achieve the most economical use of State funds for the greatest number of students. Statute does not allow for other allowable expenditures to utilize these funds.

Recommendations

To ensure State funds are used effectively, appropriately, and in accordance with law, and to increase student reading proficiencies the following recommendations are given:

1) The Board should review the technical specifications in *Utah Code* 53A-1-606.7, evaluate whether these specifications result in the best vendor to meet the needs of the LEAs and the K-3 Reading Improvement Program, and consider making recommendations to Legislative leadership for modification.

2) The Board should work with Legislative leadership to establish parameters regarding the best use of the unexpended funds remaining from the first and second year appropriation. Flexibility could be requested that may allow expenditures for

reading aides and specialists, teacher professional development, other intervention resources, or reimbursements to LEAs that have elected to use other diagnostic assessment systems.

3) The USOE should work with Wireless Generation to agree on a consistent billing methodology, to determine appropriate service dates that correspond with the school year, and the types of training to be provided through the end of the contract. See other related recommendations in Chapter I.

4) The USOE should ensure that contracts resulting from future RFPs for the Statewide system include sufficient detail regarding reasonable contract time periods, deliverables, and invoice terms to provide maximum service and generate sufficient competition for future contracts. Consideration could also be given for multiple vendors being awarded the RFP and LEAs selecting the vendor that best fits their specific needs.

Appendix A

Appendix A. Comparison of October 1, 2011 K-3 Headcount to Wireless Generation Enrollment Data

LEA Name	2011-2012 School Year		
	Total K-3 USOE Headcount on Oct. 1, 2011	Enrollment per Wireless Generation Invoice	# of Students Wireless Generation Assessed
ACADEMY FOR MATH ENGINEERING & SCIENCE (AMES)	-	-	-
ALIANZA ACADEMY	188	180	142
ALPINE DISTRICT	23,221	-	-
AMERICAN LEADERSHIP ACADEMY	390	-	-
AMERICAN PREPARATORY ACADEMY	694	-	-
ARISTOTLE ACADEMY	not opened	-	-
BEAR RIVER CHARTER SCHOOL	80	-	-
BEAVER DISTRICT	504	488	460
BEEHIVE SCIENCE & TECHNOLOGY ACADEMY (BSTA)	-	-	-
BOX ELDER DISTRICT	3,667	-	-
CACHE DISTRICT	5,085	2,161	2,088
CANYON RIM ACADEMY	303	305	305
CANYONS DISTRICT	10,337	-	-
CARBON DISTRICT	1,190	1,242	1,196
CHANNING HALL	311	-	-
CITY ACADEMY	-	-	-
C.S. LEWIS ACADEMY	235	-	-
DAGGETT DISTRICT	64	67	53
DAVINCI ACADEMY	362	-	-
DAVIS DISTRICT	22,138	-	-
DUAL IMMERSION ACADEMY	277	220	86
DUCHESNE DISTRICT	1,534	1,705	1,534
EARLY LIGHT ACADEMY AT DAYBREAK	297	-	-
EAST HOLLYWOOD HIGH	-	-	-
EDITH BOWEN LABORATORY SCHOOL	192	-	-
EMERY DISTRICT	768	791	754
ENDEAVOR HALL	174	300	163
ENTHEOS ACADEMY	208	-	-
EXCELSIOR ACADEMY	313	-	-
FAST FORWARD HIGH	-	-	-
FREEDOM ACADEMY	310	-	-
GARFIELD DISTRICT	302	-	-
GATEWAY PREPARATORY ACADEMY	304	-	-
GEORGE WASHINGTON ACADEMY	516	-	-
GOOD FOUNDATIONS ACADEMY	281	-	-
GRAND DISTRICT	438	430	438
GRANITE DISTRICT	22,377	21,871	22,186
GUADALUPE SCHOOL	104	100	100
HAWTHORN ACADEMY	312	312	312
HIGHMARK CHARTER SCHOOL	not opened	-	-
INTECH COLLEGIATE HIGH SCHOOL	-	-	-
IRON DISTRICT	2,756	-	-
ITINERIS EARLY COLLEGE HIGH	-	-	-

LEA Name	2011-2012 School Year		
	Total K-3 USOE Headcount on Oct. 1, 2011	Enrollment per Wireless Generation Invoice	# of Students Wireless Generation Assessed
JOHN HANCOCK CHARTER SCHOOL	84	82	145
JORDAN DISTRICT	16,410	-	-
JUAB DISTRICT	701	719	708
KANE DISTRICT	395	448	395
KARL G MAESER PREPARATORY ACADEMY	-	-	-
LAKEVIEW ACADEMY	324	-	-
LEGACY PREPARATORY ACADEMY	345	-	-
LIBERTY ACADEMY	226	-	-
LINCOLN ACADEMY	204	206	194
LOGAN CITY DISTRICT	2,209	766	409
MARIA MONTESSORI ACADEMY	294	208	208
MERIT COLLEGE PREPARATORY ACADEMY	-	-	-
MILLARD DISTRICT	842	-	-
MOAB CHARTER SCHOOL	58	-	-
MONTICELLO ACADEMY	300	300	286
MORGAN DISTRICT	762	-	-
MOUNTAINVILLE ACADEMY	315	-	-
MURRAY DISTRICT	1,980	1,963	1,929
NAVIGATOR POINTE ACADEMY	241	-	-
NEBO DISTRICT	9,889	-	-
NO UT ACAD FOR MATH ENGINEERING & SCIENCE (NUAMES)	-	-	-
NOAH WEBSTER ACADEMY	339	-	-
NORTH DAVIS PREPARATORY ACADEMY	430	-	-
NORTH SANPETE DISTRICT	770	785	793
NORTH STAR ACADEMY	208	-	-
NORTH SUMMIT DISTRICT	317	321	396
ODYSSEY CHARTER SCHOOL	321	-	-
OGDEN CITY DISTRICT	4,437	-	-
OGDEN PREPARATORY ACADEMY	422	412	715
OPEN CLASSROOM	219	-	-
OPEN HIGH SCHOOL OF UTAH	-	-	-
OQUIRRH MOUNTAIN CHARTER SCHOOL	393	375	363
PACIFIC HERITAGE ACADEMY	not opened	-	-
PARADIGM HIGH SCHOOL	-	-	-
PARK CITY DISTRICT	1,218	1,221	1,218
PINNACLE CANYON ACADEMY	129	150	218
PIONEER HIGH SCHOOL	-	-	-
PIUTE DISTRICT	87	61	87
PROMONTORY SCHOOL	not opened	-	-
PROVIDENCE HALL	502	-	-
PROVO DISTRICT	4,819	4,928	4,755
QUAIL RUN PRIMARY SCHOOL	296	-	-
QUEST ACADEMY	425	-	-
RANCHES ACADEMY	208	182	182

LEA Name	2011-2012 School Year		
	Total K-3 USOE Headcount on Oct. 1, 2011	Enrollment per Wireless Generation Invoice	# of Students Wireless Generation Assessed
REAGAN ACADEMY	316	315	311
RENAISSANCE ACADEMY	336	-	-
RICH DISTRICT	186	-	-
ROCKWELL CHARTER HIGH SCHOOL	-	-	-
SALT LAKE ARTS ACADEMY	-	-	-
SALT LAKE CENTER FOR SCIENCE EDUCATION	-	-	-
SALT LAKE DISTRICT	8,532	-	-
SALT LAKE SCHOOL FOR THE PERFORMING ARTS	-	-	-
SAN JUAN DISTRICT	898	-	-
SEVIER DISTRICT	1,463	1,461	684
SOLDIER HOLLOW CHARTER SCHOOL	135	160	160
SOUTH SANPETE DISTRICT	978	978	978
SOUTH SUMMIT DISTRICT	475	-	-
SPECTRUM ACADEMY	133	115	115
SUCCESS ACADEMY	-	-	-
SUMMIT ACADEMY	409	-	-
SUMMIT ACADEMY HIGH SCHOOL	-	-	-
SYRACUSE ARTS ACADEMY	436	-	-
THOMAS EDISON - NORTH	588	-	-
TIMPANOGOS ACADEMY	200	-	-
TINTIC DISTRICT	45	47	45
TOOELE DISTRICT	4,416	-	-
TUACAHN HIGH SCHOOL FOR THE PERFORMING ARTS	-	-	-
UINTAH DISTRICT	2,659	-	-
UINTAH RIVER HIGH	-	-	-
UTAH CONNECTIONS ACADEMY	55	-	-
UTAH COUNTY ACADEMY OF SCIENCE (UCAS)	-	-	-
UTAH VIRTUAL ACADEMY	521	100	90
VALLEY ACADEMY	not opened	-	-
VENTURE ACADEMY	202	-	-
VISTA AT ENTRADA SCHOOL OF PERFORMING ARTS AND TECHNOLOGY	391	364	5
WALDEN SCHOOL OF LIBERAL ARTS	136	150	122
WASATCH DISTRICT	1,659	1,662	1,729
WASATCH PEAK ACADEMY	203	-	-
WASHINGTON DISTRICT	8,585	6,329	6,169
WAYNE DISTRICT	179	-	-
WEBER DISTRICT	9,239	-	-
WEILENMANN SCHOOL OF DISCOVERY	266	-	-
UTAH SCHOOLS FOR DEAF & BLIND	106	-	-
Grand Total	195,098	54,980	53,226

Appendix B

Appendix B. Comparison of October 1, 2012 K-3 Headcount to Wireless Generation Enrollment Data

LEA Name	2012-2013 School Year		
	Total K-3 USOE Headcount on Oct. 1, 2012	Enrollment per Wireless Generation Spreadsheet	# of Middle of Year Wireless Generation's Assessments
ACADEMY FOR MATH ENGINEERING & SCIENCE (AMES)	-	-	-
ALIANZA ACADEMY	245	220	210
ALPINE DISTRICT	23,703	-	-
AMERICAN LEADERSHIP ACADEMY	449	-	-
AMERICAN PREPARATORY ACADEMY	805	-	-
ARISTOTLE ACADEMY	155	115	115
BEAR RIVER CHARTER SCHOOL	82	-	-
BEAVER DISTRICT	469	477	473
BEEHIVE SCIENCE & TECHNOLOGY ACADEMY (BSTA)	-	-	-
BOX ELDER DISTRICT	3,542	-	-
CACHE DISTRICT	5,146	-	-
CANYON RIM ACADEMY	305	299	299
CANYONS DISTRICT	10,460	-	-
CARBON DISTRICT	1,227	1,199	1,192
CHANNING HALL	311	-	-
CITY ACADEMY	-	-	-
C.S. LEWIS ACADEMY	278	149	145
DAGGETT DISTRICT	69	73	72
DAVINCI ACADEMY	426	-	-
DAVIS DISTRICT	22,361	985	967
DUAL IMMERSION ACADEMY	256	243	241
DUCHESNE DISTRICT	1,646	1,612	1,590
EARLY LIGHT ACADEMY AT DAYBREAK	298	292	288
EAST HOLLYWOOD HIGH	-	-	-
EDITH BOWEN LABORATORY SCHOOL	197	193	192
EMERY DISTRICT	752	747	738
ENDEAVOR HALL	315	296	291
ENTHEOS ACADEMY	417	206	206
EXCELSIOR ACADEMY	315	-	-
FAST FORWARD HIGH	-	-	-
FREEDOM ACADEMY	344	256	256
GARFIELD DISTRICT	314	-	-
GATEWAY PREPARATORY ACADEMY	336	331	262
GEORGE WASHINGTON ACADEMY	546	532	532
GOOD FOUNDATIONS ACADEMY	281	-	-
GRAND DISTRICT	406	412	408
GRANITE DISTRICT	22,395	22,166	21,741
GUADALUPE SCHOOL	103	96	96
HAWTHORN ACADEMY	312	228	223
HIGHMARK CHARTER SCHOOL	247	-	-
INTECH COLLEGIATE HIGH SCHOOL	-	-	-
IRON DISTRICT	2,820	2,800	2,774
ITINERIS EARLY COLLEGE HIGH	-	-	-

LEA Name	2012-2013 School Year		
	Total K-3 USOE Headcount on Oct. 1, 2012	Enrollment per Wireless Generation Spreadsheet	# of Middle of Year Wireless Generation's Assessments
JOHN HANCOCK CHARTER SCHOOL	83	82	82
JORDAN DISTRICT	16,703	-	-
JUAB DISTRICT	691	691	676
KANE DISTRICT	396	403	390
KARL G MAESER PREPARATORY ACADEMY	-	-	-
LAKEVIEW ACADEMY	376	365	365
LEGACY PREPARATORY ACADEMY	378	-	-
LIBERTY ACADEMY	199	195	190
LINCOLN ACADEMY	199	204	198
LOGAN CITY DISTRICT	2,133	2,121	2,091
MARIA MONTESSORI ACADEMY	294	200	198
MERIT COLLEGE PREPARATORY ACADEMY	-	-	-
MILLARD DISTRICT	853	871	859
MOAB CHARTER SCHOOL	80	79	64
MONTICELLO ACADEMY	301	300	300
MORGAN DISTRICT	815	-	-
MOUNTAINVILLE ACADEMY	315	312	308
MURRAY DISTRICT	2,014	1,958	1,948
NAVIGATOR POINTE ACADEMY	237	237	234
NEBO DISTRICT	9,942	9,978	7,183
NO UT ACAD FOR MATH ENGINEERING & SCIENCE (NUAMES)	-	-	-
NOAH WEBSTER ACADEMY	349	-	-
NORTH DAVIS PREPARATORY ACADEMY	434	-	-
NORTH SANPETE DISTRICT	779	779	775
NORTH STAR ACADEMY	203	202	202
NORTH SUMMIT DISTRICT	309	310	305
ODYSSEY CHARTER SCHOOL	379	-	-
OGDEN CITY DISTRICT	4,360	-	-
OGDEN PREPARATORY ACADEMY	417	413	410
OPEN CLASSROOM	193	-	-
OPEN HIGH SCHOOL OF UTAH	-	-	-
OQUIRRH MOUNTAIN CHARTER SCHOOL	399	386	384
PACIFIC HERITAGE ACADEMY	207	-	-
PARADIGM HIGH SCHOOL	-	-	-
PARK CITY DISTRICT	1,269	1,253	1,243
PINNACLE CANYON ACADEMY	126	127	127
PIONEER HIGH SCHOOL	-	-	-
PIUTE DISTRICT	83	83	82
PROMONTORY SCHOOL	200	176	175
PROVIDENCE HALL	502	-	-
PROVO DISTRICT	4,899	4,876	4,741
QUAIL RUN PRIMARY SCHOOL	180	169	167
QUEST ACADEMY	446	-	-
RANCHES ACADEMY	208	-	-

LEA Name	2012-2013 School Year		
	Total K-3 USOE Headcount on Oct. 1, 2012	Enrollment per Wireless Generation Spreadsheet	# of Middle of Year Wireless Generation's Assessments
REAGAN ACADEMY	315	279	276
RENAISSANCE ACADEMY	362	-	-
RICH DISTRICT	167	-	-
ROCKWELL CHARTER HIGH SCHOOL	-	-	-
SALT LAKE ARTS ACADEMY	-	-	-
SALT LAKE CENTER FOR SCIENCE EDUCATION	-	-	-
SALT LAKE DISTRICT	8,335	-	-
SALT LAKE SCHOOL FOR THE PERFORMING ARTS	-	-	-
SAN JUAN DISTRICT	913	-	-
SEVIER DISTRICT	1,481	1,474	1,447
SOLDIER HOLLOW CHARTER SCHOOL	162	127	124
SOUTH SANPETE DISTRICT	1,009	981	977
SOUTH SUMMIT DISTRICT	467	-	-
SPECTRUM ACADEMY	132	119	110
SUCCESS ACADEMY	-	-	-
SUMMIT ACADEMY	409	408	408
SUMMIT ACADEMY HIGH SCHOOL	-	-	-
SYRACUSE ARTS ACADEMY	433	-	-
THOMAS EDISON - NORTH	586	-	-
TIMPANOGOS ACADEMY	201	204	199
TINTIC DISTRICT	53	59	55
TOOELE DISTRICT	4,475	-	-
TUACAHN HIGH SCHOOL FOR THE PERFORMING ARTS	-	-	-
UINTAH DISTRICT	2,777	-	-
UINTAH RIVER HIGH	-	-	-
UTAH CONNECTIONS ACADEMY	80	-	-
UTAH COUNTY ACADEMY OF SCIENCE (UCAS)	-	-	-
UTAH VIRTUAL ACADEMY	500	523	491
VALLEY ACADEMY	227	222	214
VENTURE ACADEMY	198	-	-
VISTA AT ENTRADA SCHOOL OF PERFORMING ARTS AND TECHNOLOGY	402	296	295
WALDEN SCHOOL OF LIBERAL ARTS	249	136	136
WASATCH DISTRICT	1,806	1,648	1,625
WASATCH PEAK ACADEMY	226	-	-
WASHINGTON DISTRICT	8,381	6,453	6,281
WAYNE DISTRICT	163	159	159
WEBER DISTRICT	9,401	9,394	9,223
WEILENMANN SCHOOL OF DISCOVERY	271	260	259
UTAH SCHOOLS FOR DEAF & BLIND	89	-	-
Grand Total	**198,554**	**83,439**	**79,287**

July 30, 2013

Natalie Grange
Utah State Office of Education
250 East 500 South
PO Box 144200
Salt Lake City, UT 84114

Dear Ms. Grange,

Wireless Generation[i] is committed to helping every American schoolchild read on grade level by third grade. Over the past 18 months, we have worked with 40% of Utah's K-3 students and have begun to see measurable improvement in the State's reading achievement levels – anywhere from 4 to 9 percent more children in each grade are on track for reading success.

Wireless Generation appreciates the opportunity to respond to this Report, which highlights the challenges of implementing an innovative, technology-based program in a largely traditional educational system. As an education technology innovator serving millions of children and operating in all 50 states, we welcome thoughtful discussion of the quality and proven value of our unique tools and services. While there is always room for improvement, as there is with any new contract relationship, the Report fails to highlight the substantial gains in reading success that our partnership with the State Office of Education has produced.

More of Utah's children are on track to third grade reading success.

For the schools that began implementation of the Diagnostic Assessment System in the 2011-2012 school year, we are able to compare the percentage of children at DIBELS benchmark (i.e., at expectations) across two school years. DIBELS benchmark status is highly predictive of third grade reading outcomes. We have seen consistent growth across all grade levels, just 18 months into the program:

Year over Year Growth	Students at Benchmark Spring 2012	Students at Benchmark Spring 2013	Increase
Kindergarten	61 %	70 %	+9
First Grade	65 %	69 %	+4
Second Grade	66 %	70 %	+4
Third Grade	68 %	72 %	+4

Even more promising, when we analyze "high-fidelity" districts – those that make substantial use of the Wireless Generation instructional planning tools described in the Report, including a student grouping tool and an analyzer of item-level error patterns – we see substantial intra-year gains in the 2012-2013 school year:

High Fidelity Districts	Students at Benchmark Aug/Sept 2012	Students at Benchmark May 2013	Increase
Juab School District	55 %	68 %	+13
Logan City School District	61 %	79 %	+18
Park City School District	72 %	79 %	+7
Wasatch County School District	55 %	64 %	+9
Weber School District	63 %	71 %	+8
State Average (in program)	61 %	67 %	+6

One of the innovative aspects of the program is the requirement of a thorough program review analyzing student achievement gains versus non-participating students, due to the Legislature in November 2013. We are working with USOE on making that evaluation as objective and illuminating as possible. We believe the focus of any review for a program serving students ought to be grounded in student achievement. By this measure, the K-3 Reading Diagnostic Assessment program is showing promise of lasting success.

Wireless Generation's unique tools and services are producing significant growth in student reading ability.

The Report uncritically explores the implementation of low-cost alternatives such as VPORT or AIMSWeb. While automating assessment and saving teacher time on assessment is certainly a benefit of Wireless Generation's mCLASS® solution, there are many companies who can do basic automation and data aggregation. As the Report points out, some of these competing products are less expensive than our offerings. While these products might be adequate for a school system whose only goal is check-the-box compliance and a return to ingrained teaching practices, Wireless Generation's products and services are designed not only to identify problems, but to help teachers teach. Our tools help teachers diagnose complicated error patterns; provide week-by-week links to the core instructional programs in schools; and provide easy-to-use intervention activities directly on the assessment device. Any product can provide you with data. Wireless Generation has invested over a decade in helping teachers turn that data into real reading gains for students.

The low-cost providers lack several unique and distinguishing features that mCLASS provides, including:

- Flexible, mobile assessment designed for online or offline administration
- Ongoing progress monitoring, supporting frequent check-ins on at-risk students
- Instructional links, lesson planning tools and support, including:
    - Explicit lessons based on a student's DIBELS results, recommended based on analysis of student responses and automated identification of error patterns;
    - Grouping recommendations based on student performance; and
    - A link from individual student results directly to appropriate instructional resources by chapter and page number in the teacher editions of 5 national basal reading programs.

These features are not just bells and whistles. They are crucial to supporting effective teaching based on each student's reading assessment results.

Wireless Generation's work in Utah is yielding a high rate of Progress Monitoring, a practice demonstrated to lead to improved student achievement.

The Report states that, "While the electronic administration of a benchmark is a critical piece of the overall reading improvement strategy, it does not appear to be the pivotal element to ultimately improve reading proficiency." We agree that administering formative literacy assessments three times a year (beginning, middle and end) is valuable, but the real question is, what can a teacher do in between those benchmarks with students who have been identified as being at risk?

Progress Monitoring, as enabled by Wireless Generation's mCLASS solution, has been demonstrated to lead to improved student outcomes. For a review of third-party research, see "How Student Progress Monitoring Improves Instruction" by Safer and Fleischman (2005) at http://www.studentprogress.org/weblibrary.asp#research.)

While frequent progress monitoring is not required by Utah's legislation, as the Report notes, schools have begun to use ongoing progress monitoring data to inform instructional decisions and the rates of progress monitoring across the program have climbed. This elective process, only feasible at scale via mobile assessment technology, is increasingly pervasive across the State, thanks to this program, and the research indicates that it is a likely contributor to student achievement gains.

The RFP for a diagnostic assessment system would have attracted more competition had USOE not previously selected DIBELS as the State Board-approved assessment.

Referencing HB302, the Report states that, "the statute also mandates very specific technology requirements be included in the RFP." While HB302 did include technology requirements, there are several vendors that could have satisfied those requirements.

Although DIBELS was in widespread use in the State of Utah before 2011, the State did not require its use. Indeed, the State Board of Education established DIBELS as the required assessment after the Legislature passed HB302, only a month before it released the RFP implementing the legislation. If the USOE had issued an RFP for technology and assessment jointly (as most states have done) rather than first designating DIBELS as the required assessment via regulation and then competing for assessment administration technology, several other vendors could have taken part. Wireless Generation welcomes the opportunity for such competition.

The alternative expenditures outlined in the Report are unlikely to lead to improved outcomes absent a system like the K-3 Diagnostic Assessment System.

The Report compares the expenditure of State funds on K-3 assessment tools versus an investment in "additional reading aides, specialists, and coaches." Setting aside the small sample size of the survey (9 literacy directors), it is important to keep in mind that successful intervention and coaching depends on timely data linked to action. Without the assessment data collected by our system, and without the rich instructional planning tools that support grouping, activity selection, and links to the basal program, it is hard to understand how "targeted interventions" could be targeted, let along delivered and monitored. Furthermore, applying the full program appropriation to hiring additional reading specialists would result in only one specialist for every 11 elementary schools in the state – or fewer than two days per month in a school.

Other technical contract issues have been resolved to the satisfaction of the State and Wireless Generation.

The Report details a number of technical points related to implementation of the contract, including methods of determining enrolled students, contract period, and other issues. As the Report indicates, Wireless Generation has acted in good faith with USOE to resolve all of the issues raised in the Report. Throughout, we have acted in accordance with the contract terms. We remain committed to the continued, successful implementation of this important Utah program.

Wireless Generation is committed to the same goal as that of the State of Utah: helping every child read successfully by the end of third grade. As the Report notes, we have worked through several challenges with the contracting and invoicing process, and have negotiated a resolution to all outstanding issues with the State. We are proud of the contribution that we have made to the State's early successes with the program.

Sincerely yours,

Zachary Silverstein
President
Amplify Insight (fka Wireless Generation, Inc.)
55 Washington Street, Suite 900
Brooklyn, NY 11201-1071

[i] At the end of 2012, Wireless Generation, Inc. changed its name to Amplify Education, Inc. In the interest of consistency with the USOE's Report, we are using our historical name in this response.