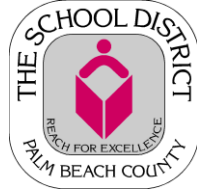


Audit of
The Purchase of *iReady* Educational Software
September 15, 2023

Report #2023-08



MISSION STATEMENT

The mission of the School District of Palm Beach County is to educate, affirm, and inspire each student in an equity-embedded school system.

Michael J. Burke
Superintendent of Schools

School Board Members

Frank A. Barbieri, Jr., Esq., Chair
Karen M. Brill, Vice Chair
Marcia Andrews
Alexandria Ayala
Edwin Ferguson, Esq.
Barbara McQuinn
Erica Whitfield

Audit Committee Members

David H. Talley, Chair
Tammy McDonald, Vice Chair
Mark Bymaster, CPA, CFE
Leondrae D. Camel
Alissa M. Dhawan, CPA, MBA
Michael Dixon, CPA/PFS
Kathleen Weigel, Ed.D.

Audit Committee Representatives

Frank A. Barbieri, Jr., Esq., School Board Chair
Heather Frederick, CPA, Chief Financial Officer
A. Patricia Morales, Esq., Deputy General Counsel
Kathryn Koerner, Principal Representative
Gordan Longhofer, CTA President

Audit of
The Purchase of *iReady* Educational Software
Table of Contents

	Page
EXECUTIVE SUMMARY	i
PURPOSE AND AUTHORITY	1
SCOPE AND METHODOLOGY	1
BACKGROUND	2
CONCLUSIONS	
1. Vendor’s Billings Were Consistent With the <i>Purchase Contract</i> and Appropriately Funded	4
2. CERP Not Updated With the Florida Department of Education (FDOE)	6
3. No Formal Procedures for Middle Schools’ Purchases and Use of <i>iReady</i> Instructional Materials, Including Software	7
APPENDIX	
Management’s Response	9

This page intentionally left blank.

Audit of
The Purchase of *iReady* Educational Software
EXECUTIVE SUMMARY

Pursuant to the *Office of Inspector General’s (OIG) 2022-2023 Work Plan*, we have audited the purchase of *iReady* educational software. The primary objectives of the audit were to determine the extent of compliance with applicable *Florida Department of Education Rules* and *School Board Policies*, and whether (1) the vendor complied with the terms and conditions of the *Purchase Contract*, (2) the vendor delivered the agreed upon services and materials, (3) the invoice billing rates were correct and adequately supported, and (4) the costs incurred were allowable and funded by appropriate funding sources.

iReady is a web-based diagnostic and instruction platform for reading and mathematics that align with the District’s *Comprehensive Evidence-Based Reading Plan (CERP)*¹ and Florida’s *Benchmark for Excellent Student Thinking (B.E.S.T.) Standards for English Language Arts and Mathematics*.² On May 11, 2016, the School Board approved *Purchase Contract #FMPA10 051116-1* to purchase software site licenses for the *iReady Suite*. Concurrent to procuring *iReady* products through the *Purchase Contract*, some elementary and middle schools procured site licenses along with instructional materials through school-initiated *Requests for Quotes (RFQ’s)*.

The audit produced the following major conclusions:

- 1. Vendor’s Billings Were Consistent With the *Purchase Contract* and Appropriately Funded**
 - a. Vendor Pricing Consistent with *Purchase Contracts*. During Fiscal Years 2017 through 2022, the District paid the *iReady’s* vendor a total of \$12,683,004 through 62 invoices for site licenses and supplemental purchases including support services, professional development, student assessments, and teacher toolboxes. Our review found the billings were consistent with the contract prices.

¹ See *Florida Administrative Code Rule 6A-6.053(1)*, requiring school districts to annually submit a Board approved K-12 Comprehensive Evidence-Based Reading Plan (CERP) for the specific use of the evidence-based reading instruction allocation by June 15. “**The District K-12 CERP must accurately depict and detail the role of...curriculum, and instruction** in the improvement of the B.E.S.T. English Language Arts Standards as provided in Rule 6A-1.09401, F.A.C.” (Emphasis added.)

² See *Florida Administrative Code Rule 6A-1.09401(1)(a-b)*, defining Student Performance Standards in Florida as state academic standards, establishing the core content of the curricula to be taught, specifying the core content knowledge and skills that K-12 public school students are expected to acquire, and incorporating by reference Florida’s Benchmarks for Excellent Student Thinking (B.E.S.T.) - English Language Arts (2021) and Mathematics (2020).

- b. Costs Incurred for iReady Computer Software Purchases Were Allowable. Major funding sources included the annual General Fund allocation and other Federal and State funds for Instructional Materials. Except for deficiencies in purchasing materials for middle schools as discussed in Conclusions #2 and #3 below, our review of the payment records found the expenditures were funded by the appropriate funding sources.

Management's Response: Concur. (See page 9.)

2. CERP Not Updated With the Florida Department of Education (FDOE)

CERPs list web-based screening, diagnostic, and progress monitoring assessment tools to be used as core instruction and supplemental intervention support. Each CERP submitted to FDOE during the audit period did not list *iReady* for use in Grades 6-8. Instead, other web-based instruction software and interventions were listed, specifically, *Reading Plus*, *S.P.I.R.E. Reading* and *Wilson Reading System*. However, our review of purchases found 10 secondary schools (Grades 6-12) with 15 purchases totaling \$142,814 for *iReady* site licenses.

According to FDOE, modifications to the CERP are allowed. Changes must be updated online in the FDOE's Florida Continuous Improvement Management System (CIMS). As of June 5, 2023, the District had not submitted any requests for plan adjustments or modifications which identified *iReady* as an approved reading progress monitoring tool for middle schools. The District should update and maintain the annual CERP filed with FDOE pursuant to **Rule 6A-6.053, Florida Administrative Code** to reflect the current approved tools used for reading instruction.

Management's Response: Concur. The comprehensive Evidence-Based Plan (CERP) was not updated to include iReady Reading for middle schools because the District adaptive reading instrument for all secondary schools was Reading Plus. iReady Reading was the adaptive instrument for elementary schools and was only to be utilized in selected middle schools where it was explicitly noted. It is also important to note that the CERP was submitted and approved as required to FLDOE annually, indicating the implementation as noted above. (See page 9.)

3. No Formal Procedures for Middle Schools' Purchases and Use of iReady Instructional Materials, Including Software

The review of all *iReady* purchases during Fiscal Years 2017 through 2020 identified four secondary schools used the *iReady* reading software as the core instruction or intervention tool, four schools used the software as a supplemental resource, and two schools used it for both intervention and supplemental purposes. Two schools had received special approval to use the platform as an intensive intervention reading tool through FY 2021. One of the two schools submitted a request to the Department of Teaching and Learning³ for continued use of *iReady* but the request was denied. However, this school continued to use the software for core reading intervention through FY 2022.

³ During the October 2022 reorganization, the functions of the Department of Teaching and Learning were assigned to the departments of Elementary Education, and Secondary Education.

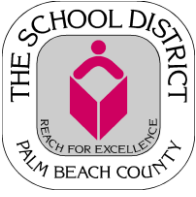
Staff from Secondary Education confirmed that no definitive procedures or guidelines were established for schools or departments to follow related to the purchase and use of instructional materials outside the grade levels specified in the CERP. According to the former Assistant Superintendent of Teaching and Learning, changes related to instructional materials use must be submitted to the department for approval. However, there are no written procedures requiring documented approval and no written consequences for noncompliance.

To ensure proper accountability and compliance with State requirements and the District's CERP, we recommend the District establish definitive rules and guidelines for the use and purchase of computer software programs:

1. Develop policies and procedures to streamline purchases and ensure adherence to management directives by local schools and departments,
2. Establish protocols for documenting approvals, exceptions, and non-compliance,
3. Ensure procedures are widely distributed and available to all related departments and local schools, and
4. Implement and maintain tracking procedures to ensure that all schools utilize the recommended instructional materials, including software indicated in the CERP.

Management's Response: *Concur. A bulletin will be published to accompany the Comprehensive Evidence-Based Reading Plan (CERP) to make certain clear and concise guidance is provided for all users. (See page 9.)*

This page intentionally left blank.



THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA

OFFICE OF INSPECTOR GENERAL
3318 FOREST HILL BLVD., C-306.
WEST PALM BEACH, FL 33406
(561) 434-7335 FAX: (561) 434-8652
www.palmbeachschools.org
Hotline: (855) 561-1010

TERESA MICHAEL, CIG, CIGI, CFE
INSPECTOR GENERAL

SCHOOL BOARD
FRANK A. BARBIERI, JR, ESQ, CHAIR
KAREN M. BRILL, VICE CHAIR
MARCIA ANDREWS
ALEXANDRIA AYALA
EDWIN FERGUSON, ESQ
BARBARA McQUINN
ERICA WHITFIELD

MICHAEL J. BURKE, SUPERINTENDENT

MEMORANDUM

TO: Honorable Chair and Members of the School Board
Michael J. Burke, Superintendent of Schools
Chair and Members of the Audit Committee

FROM: Teresa Michael, Inspector General

DATE: September 15, 2023

SUBJECT: Audit of the Purchase of *iReady* Educational Software

PURPOSE AND AUTHORITY

Pursuant to the *Office of Inspector General's (OIG) 2022-2023 Work Plan*, we have audited the purchase of *iReady* educational software. The primary objectives of the audit were to determine the extent of compliance with applicable *Florida Department of Education Rules* and *School Board Policies*, and whether

- 1) The vendor complied with the terms and conditions of the *Purchase Contract*.
- 2) The vendor delivered the agreed upon services and materials.
- 3) The invoice billing rates were correct and adequately supported.
- 4) The costs incurred were allowable and funded by appropriate funding sources.

SCOPE AND METHODOLOGY

This audit was performed in accordance with *Generally Accepted Government Auditing Standards*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on the audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions.

The audit covered purchases of *iReady* educational software from the vendor, Curriculum Associates, through *Purchase Contract #FMPIA10 051116-1 - iReady Diagnostic and Instruction for Reading and Mathematics Grades K-5*, executed on May 11, 2016, and subsequent amendments. During the audit, we met with District staff and reviewed:

- *Federal Statutes and Regulations*
 - *CARES Act, Section 18002(c)*
 - *CRRSA Act, Section 312(c)*
 - *Title I ESEA, as amended by the Every Student Succeeds Act of 1965 (ESSA)*
 - *2 C.F.R §200.403 - Factors affecting allowability of costs*

- May 2021 U.S. Department of Education’s ESSER and GEER Programs Frequently Asked Questions (A-3)
- **Florida Statutes**
 - **Section 1006.28** - Duties of district school board, district school superintendent; and school principal regarding K-12 instructional materials
 - **Section 1006.40** - Use of instructional materials allocation; instructional materials, library books, and reference books, repair of books
- **Rule 6A-1.09401, Florida Administrative Code (F.A.C.)** - Student Performance Standards
- **Rule 6A-6.053, Florida Administrative Code (F.A.C.)** - District K-12 Comprehensive Evidence-Based Reading Plan
- Florida Department of Education (FDOE) Federal Educational Programs - Title IV Part A, Student Support & Academic Enrichment (SSAE)
- **School Board Policies**
 - **6.14 – Purchasing Department**
 - **8.122 - Textbooks and Instructional Materials**
- **Purchasing Manual** and related procedures
- **Purchase Contract #FMPA10 051116-1** - *iReady Diagnostic and Instruction for Reading and Mathematics Grades K-5*
- District Records
 - *Comprehensive Evidence Based-Reading Plans*
 - *Considerations for the Use of Title I Funds, Adapted from FDOE Technical Assistance*
 - Software License Agreement(s)
 - Technology Clearing Committee Minutes
 - Purchasing and Payment Records
 - Email communications

The draft report was provided to management for review and comments. The management response is included in the Appendix. We appreciate the courtesy and cooperation extended to us by staff during the audit. The final draft report was presented to the Audit Committee at its September 15, 2023, meeting.

BACKGROUND

iReady is a web-based diagnostic and instruction platform for grades K-8 reading and mathematics. The curriculum and instructional materials provided by *iReady* are consistent and align with the:

- District’s *Comprehensive Evidence-Based Reading Plan* (CERP)⁴
- *Benchmark for Excellent Student Thinking (B.E.S.T.) Standards for English Language Arts* (formerly *Language Arts Florida Standards*)
- *Benchmarks for Excellent Student Thinking (B.E.S.T.) Standards for Mathematics* (formerly *Mathematics Florida Standards*)

⁴ CERP is a comprehensive evidence-based sequence of reading instruction and strategies which must accurately depict and detail the role of administration, professional development, assessment, curriculum, and instruction in the improvement of student learning of the B.E.S.T English Language Arts Standards as provided in **Rule 6A-1.09401, F.A.C.**

The *iReady* system combines diagnostic, growth monitoring, standards mastery, and progress monitoring assessments with instructional resources personalized to meet each student’s specific academic needs. The *iReady* Diagnostic Assessment Suite offers both digital and offline platforms and is designed specifically for grade levels K-12. The *iReady* Student Instruction is an online instruction program available for grade levels K-8 and its content is based on the results of the *iReady* Diagnostic Assessment.

On May 11, 2016, the School Board approved ***Purchase Contract #FMPA10 051116-1- iReady Diagnostic and Instruction for Reading and Mathematics Grades K-5*** for purchasing *iReady* diagnostic and instructional software site licenses for grades K-5 reading and mathematics. The original contract was awarded to Curriculum Associates in the amount of \$5,601,822, effective May 13, 2016, through June 30, 2019. On August 15, 2018, the contract was amended for an additional \$249,999 to include mathematics K-8 Teacher Toolbox site licenses. On July 25, 2019, the School Board approved a second amendment extending the contract term through July 31, 2020, for an additional \$1,933,282. (See Table 1.)

Table 1
Contract #FMPA10 051116-1 and Amendments

Products	Original Contract FY 2017-2019 (3 Years)	Amendment 1 FY 2019	Amendment 2 FY 2020 (1 Year)	Totals
Reading & Mathematics Site Licenses	\$5,601,822		\$1,933,282	\$7,535,104
K-8 Mathematics Teacher Toolbox Site Licenses		\$249,999		\$249,999
<i>Contract Total</i>	<i>\$5,601,822</i>	<i>\$249,999</i>	<i>\$1,933,282</i>	<i>\$7,785,103</i>

Source: PeopleSoft System

Schools Purchasing Software Licenses. Concurrent to procuring *iReady* products through ***Contract #FMPA10 051116-1***, some elementary and middle schools individually procured *iReady* computer software site licenses (both reading and mathematics), along with instructional and supplemental materials through school-initiated *Requests for Quotes (RFQ's)*. These purchases were made independent of the original ***Purchase Contract*** and without the Purchasing Department’s input and involvement.

Purchases Continued After the ***Purchase Contract*** Expired. After the contract’s expiration on June 30, 2020, the Department of Teaching & Learning⁵ and certain schools continued to pay for licenses that allowed continued use of the software. New purchases were made through individual RFQ’s based on the School Board’s annual budget authorization for instructional materials, because Curriculum Associates was one of multiple preapproved vendors for instructional materials.

⁵ During the October 2022 reorganization, the functions of the Department of Teaching and Learning were assigned to the departments of Elementary Education, and Secondary Education.

Complaints Received. On September 28, 2018, the OIG received a complaint (Case #19-848) regarding inappropriate use of funds for purchasing *iReady*. The allegations were unsubstantiated.⁶

Subsequently, on December 11, 2020, the Assistant Superintendent of the Department of Teaching & Learning submitted a second, separate complaint with the OIG. The complaint alleged a potential conflict of interest and expressed concerns regarding the purchase and use of *iReady* reading software by seven middle schools (Carver, Congress, L.C. Swain, Okeeheelee, Palm Springs, Tradewinds, and Logger's Run), which contradicted the School Board approval of **Contract #FMPA10 051116-1** for use by K-5 elementary students only. The OIG's preliminary review found no evidence that a conflict of interest existed. However, the OIG noted a lack of internal controls and procedures for the purchase and use of *iReady* software by middle schools even though the software was not part of the District's CERP for middle schools.⁷

Due to the two complaints related to the purchase of *iReady* software, the OIG included this audit in the Fiscal Year 2023 Work Plan.

CONCLUSIONS

The audit produced the following major conclusions:

1. Vendor's Billings Were Consistent With the *Purchase Contract* and Appropriately Funded

a. Vendor Pricing Consistent with *Purchase Contracts*

During Fiscal Years 2017 through 2022, the District paid Curriculum Associates a total of \$12,683,004 through 62 invoices for:

- *iReady* reading and mathematics site licenses, and
- Supplemental Purchases, including:
 - *iReady System* Implementation support services,
 - Professional development (to assist educators in effectively implementing teaching standards),
 - Reading and mathematics student assessments, and
 - Teacher toolboxes (reading, writing, and/or math). (See Table 2.)

⁶ OIG Case #19-848 Inappropriate Use of Instructional Materials Funds for the Purchasing of *iReady*

⁷ OIG Case #21-005-1 Conflict of Interest

Table 2
***iReady* Site Licenses & Supplemental Purchases**
Fiscal Years 2017 Through 2022

Fiscal Year	Licenses - Reading & Mathematics	Supplemental Purchases	Total
2016-17	\$3,113,313	\$32,000	\$3,145,313
2017-18	\$1,313,916	\$253,000	\$1,566,916
2018-19	\$1,322,311	\$255,999	\$1,578,310
2019-20	\$1,449,786	\$540,896	\$1,990,682
2020-21	\$2,386,144	\$843,280	\$3,229,424
2021-22	\$1,149,176	\$23,183	\$1,172,359
Total	\$10,734,646	\$1,948,358	\$12,683,004

Source: PeopleSoft System

Our review of the *Purchase Orders* and paid invoices found the billings were consistent with the contract prices. Yearly purchases were within the Board’s approved annual budget authorization for instructional materials.

b. Costs Incurred for *iReady* Computer Software Purchases Were Allowable

Major funding sources for *iReady* purchases included the

- General Fund,
- Governor’s Emergency Education Relief Fund (GEER),
- Federal Elementary & Secondary School Emergency Relief Fund (ESSER), and
- Federal Title I Program Funds.

Supporting documentation for the purchases included the District’s School-Wide Plans (SWPs), Comprehensive Needs Assessments, and FDOE Project Award Notifications for the grant periods. The costs incurred appeared reasonable and allowable by the various Federal, State, and local funding sources. Table 3 provides a summary of *iReady* funding sources for the audit period.

Table 3
Funding Sources for *iReady* Site Licenses & Supplemental Expenditures
Fiscal Years 2017-2022

Fund	Total
1000 General Fund	\$9,749,665
4420 Governor’s Emergency Education Relief Fund (GEER)	1,144,700
4426 Elementary & Secondary School Emergency Relief Fund II (ESSER)	1,112,512
1005 General Fund-Non-Recurring	250,000
4201 Title I Grant	275,012
4221 Unified School Improvement Grant	59,932
4383 Title IV Student Support & Academic Enrichment	28,225
4419 Elementary & Secondary School Emergency Relief Fund (ESSER)	22,453
4679 Schools of Hope- (Lake Shore Middle)	20,315
4473 Alternative Ed-Delinquent	10,600
*Other	9,590
Total	\$12,683,004

Source: PeopleSoft System

*Other: Sum of all other funding sources less than \$10,000 each

Although the vendor’s billings were consistent with the *Purchase Contract*, and the expenditures were funded by the appropriate funding sources, our review identified certain deficiencies in purchasing *iReady* materials for middle schools as discussed in Conclusions #2 and #3 below.

Management’s Response: Concur. (See page 9.)

2. CERP Not Updated With the Florida Department of Education (FDOE)

Pursuant to **Rule 6A-6.053, FAC**, “Annually, school Districts shall submit a K-12 Comprehensive Evidence-Based Reading Plan for the specific use of the evidenced-based reading instruction allocation....” The District’s Comprehensive Evidence-Based Reading Plans (CERPs) for Fiscal Years 2020, 2021, and 2022, list specific web-based screening, diagnostic, and progress monitoring assessment tools to be used as core instruction and supplemental intervention support.

Each CERP submitted to and approved by the FDOE indicated that grades K-5 use *iReady* adaptive technology for diagnostic assessment, and grades 6-12 use *Reading Plus* for screening and formative assessments. Additionally, when intervention or intensive intervention is required for grades 6-12, the *S.P.I.R.E. Reading* and *Wilson Reading System* may be used.

The *iReady* software program was not an intervention tool indicated in the District’s annual CERPs for grades 6-12. However, our review of all *iReady* computer software and site license purchases from July 1, 2016, through March 31, 2022, found 10 secondary schools (grades 6-12) with 15 purchases totaling \$142,814 for *iReady* reading site licenses. (See Table 4 on page 7.)

According to FDOE, they do allow for modifications to a core or intervention program on the CERP. Changes must be updated online in the FDOE’s Florida Continuous Improvement Management System (CIMS). The District can email a request to the FDOE contact to reopen CIMS. However, as of September 7, 2022, according to FDOE, the District had not submitted any requests for plan adjustments or modifications which identified *iReady* as an approved reading progress monitoring tool for middle schools. Additionally, on May 10, 2023, the School Board approved the FY 2023-2024 CERP which did not include *iReady* as a tool for secondary school use.

Recommendation

The District should update and maintain the annual CERP filed with FDOE pursuant to **Rule 6A-6.053, Florida Administrative Code**, to reflect the current approved tools used for reading instruction.

Management’s Response: Concur. The comprehensive Evidence-Based Plan (CERP) was not updated to include iReady Reading for middle schools because the District adaptive reading instrument for all secondary schools was Reading Plus. iReady Reading was the adaptive instrument for elementary schools and was only to be utilized in selected middle schools where it was explicitly noted. It is also important to note that the CERP was submitted and approved as required to FLDOE annually, indicating the implementation as noted above. (See page 9.)

3. No Formal Procedures for Middle Schools’ Purchases and Use of *iReady* Instructional Material, Including Software

CERP Did Not Include *iReady* Use for Middle School Instruction. *iReady* was not approved for reading instruction for Middle Schools. The District’s CERP indicated that *Reading Plus* was the approved tool for Grades 6-12. The review of all *iReady* purchases during Fiscal Years 2017 through 2022 identified four secondary schools used the *iReady* reading software as the core instruction or intervention tool, four schools used the software as a supplemental resource, and two schools used it for both intervention and supplemental purposes. (See Table 4.)

**Table 4
Secondary Schools *iReady* Reading Software Purchases
Fiscal Years 2017-2022**

School Name	Fiscal Year	Invoice Amounts	Fund #	Software Usage		
				Core Instruction	Intervention	Supplemental
Indian Ridge School	FY 2017	\$2,400	4201 (1)		X	X
Seminole Ridge High	FY 2019	\$600	1000 (2)		X	X
JFK Middle	FY 2017	\$9,733	4201	X		
	FY 2020	\$15,530	4221 (3)			
	FY 2021	\$10,472	4221			
Lake Shore Middle	FY 2019	\$10,100	4221	X		
	FY 2020	\$12,080	4679 (4)			
	FY 2021	\$8,755	4201			
	FY 2022	\$10,625	4201			
Carver Middle	FY 2021	\$13,464	4201			X
Congress Middle	FY 2021	\$15,054	4201	X		
L.C. Swain Middle	FY 2021	\$15,054	4201			X
Loggers Run Middle	FY 2021	\$1,658	1000		X	
Okeehelée Middle	FY 2021	\$3,825	4201			X
Tradewinds Middle	FY 2021	\$13,464	4201			X
Total		\$142,814				

Source: PeopleSoft/Vendor Invoices
 Notes: (1) Title I Grant
 (2) General Fund
 (3) Unified School Improvement Grant
 (4) School of Hope Lake Shore Middle Grant

According to the Department of Teaching and Learning, two of the 10 secondary schools were identified as low performing schools with “Differentiated Accountability” (DA)⁸ and were granted FDOE approval to use the *iReady* Reading Diagnostic and Instruction platform as the intensive intervention reading tool until the expiration of the approved grant (FY 2021).

At the expiration of the grant, one of the two DA schools submitted a request to the Department of Teaching and Learning for continued use of the *iReady* software. District correspondence indicated the request was denied, but this school continued to use the *iReady* reading software for core reading intervention during FY 2022.

⁸ See §1008.33, Fla. Stat. establishing the Differentiated Accountability System of state support for which deficient and failing schools are identified for escalating support, monitoring and intervention.

Based on discussions with Secondary Education staff, we determined that there were no definitive procedures or guidelines established for schools or departments to follow related to the purchase and use of instructional materials outside the grade levels specified in the CERP. According to the former Assistant Superintendent of Teaching and Learning, changes related to instructional materials use were to be submitted to the Department of Teaching and Learning for approval. However, there are no written procedures requiring documented approval and no written consequences for noncompliance.

A review of payment records and various email communications between departments (Department of Teaching and Learning, Purchasing Department, and the Department of Federal and State Programs) further indicated a lack of clear direction and guidelines as some secondary schools were approved to purchase *iReady* reading software with federal funds, although the software was not listed in the CERP.

In FY 2021, a tracking spreadsheet entitled “Use This Not That” was developed by the Department of Teaching and Learning to track District-approved and unapproved computer software curriculum materials. However, there is no evidence to support how District and school staff received this information. According to the Chief Academic Officer, any updates related to the use of curriculum materials is disseminated to Principals and District leadership.

Recommendation

To ensure proper accountability and compliance with State requirements and the District’s CERP, we recommend the District establish definitive rules and guidelines for the use and purchase of evidenced-based instructional materials, including software and related programs:

1. Develop policies and procedures to streamline purchases and ensure adherence to management directives by local schools and departments,
2. Establish protocols for documenting approvals, exceptions, and non-compliance,
3. Ensure procedures are widely distributed and available to all related departments and local schools, and
4. Implement and maintain tracking procedures to ensure that all schools utilize the recommended instructional materials, including software indicated in the CERP.

Management’s Response: *Concur. A bulletin will be published to accompany the Comprehensive Evidence-Based Reading Plan (CERP) to make certain clear and concise guidance is provided for all users. (See page 9.)*

– End of Report –

Management's Response



THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FL

CHIEF ACADEMIC OFFICE
3300 FOREST HILL BOULEVARD, C-201
WEST PALM BEACH, FL 33406

GLEND A SHEFFIELD, Ed.D.
CHIEF ACADEMIC OFFICER

EDWARD C. TIERNEY
DEPUTY SUPERINTENDENT/CHIEF OF SCHOOLS

PHONE: 561-434-8616 / FAX: 561-649-6837
WWW.PALMBEACHSCHOOLS.ORG

MEMORANDUM

TO: Teresa Michael, Inspector General
FROM: Glenda Sheffield, Ed.D, Chief Academic Officer *GS*
DATE: June 26, 2023
SUBJECT: Audit of the Purchase of iReady Educational Software

RECEIVED

JUN 28 2023

INSPECTOR GENERAL

In response to the audit regarding the purchase of iReady Educational Software, please note that I concur with the findings.

Recommendation #2:

Regarding recommendation No. 2, the Comprehensive Evidence-Based Reading Plan (CERP) was not updated to include iReady Reading for middle schools because the District adaptive reading instrument for all secondary schools was Reading Plus. i-Ready Reading was the adaptive instrument for elementary schools and was only to be utilized in selected middle schools where it was explicitly noted. It is also important to note that the CERP was submitted and approved as required to FLDOE annually, indicating the implementation as noted above.

Recommendation #3:

Regarding recommendation No. 3, a bulletin will be published to accompany the Comprehensive Evidence-Based Reading Plan (CERP) to make certain clear and concise guidance is provided for all users.

The School District of Palm Beach County, Florida
A Top High-Performing A-Rated School District
An Equal Opportunity Education Provider and Employer

MS