



Georgia Department of Audits and Accounts

Performance Audit Operations

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Why we did this review

The Georgia Network for Educational and Therapeutic Support (GNETS) was created by the General Assembly in 1972 to serve students with severe emotional disorders. The purpose of the GNETS program is to keep students from entering a higher cost residential placement and to return students to their general education setting. This audit was conducted to determine if the GNETS program is meeting its purpose, has developed appropriate and achievable goals, and to ensure that the Georgia Department of Education (GaDOE) is being a good steward of the state and federal funds appropriated for the operation of the GNETS program.

Who we are

The Performance Audit Operations Division was established in 1971 to conduct in-depth reviews of state programs. The purpose of these reviews is to determine if programs are meeting their goals and objectives; provide measurements of program results and effectiveness; identify other means of meeting goals; evaluate the efficiency of resource allocation; and assess compliance with laws and regulations.

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Georgia Network for Educational and Therapeutic Support (GNETS)

Programs should be held accountable for student performance

What we found

Currently, the Georgia Department of Education (GaDOE) cannot demonstrate that the services provided to students in the Georgia Network for Educational and Therapeutic Support (GNETS) Program have resulted in improvements to behavior or academic performance. Given the vulnerability of the population it serves and the amount of state resources expended, GaDOE has an increased need for accountability to ensure that all GNETS programs have an on-going system for documenting effectiveness and program improvement.

In 1972, the General Assembly decided to serve students with severe emotional disorders through a separate program. In fiscal year 2010, funding for the Program totaled \$64 million in state funds (\$72 million total funds). The funding is based on smaller ratios of students to teachers, more therapeutic staff, and other support. Data on GNETS students has not been collected in a way that it can be aggregated at the state level and used to assess the GNETS Program's performance against a standard. There is no evaluation to determine whether the funds provided to serve these students are having the desired impact. In addition, GaDOE has not applied standards or specific goals that the Programs must meet to be performing adequately.

GNETS is a special education program that serves students ages 3-21 with emotional and behavioral disorders of such *duration, frequency, and intensity* that they require specialized instruction and therapeutic interventions; such services may be provided in general, special education, and/or separate GNETS classrooms. State Board of Education rules define the purpose of GNETS as

prevent[ing] children from requiring residential or other more restrictive placements by offering cost-effective comprehensive services in local areas and to support the [school system's] continuum of services by providing comprehensive special education and therapeutic support for the children served. GNETS is made up of 24 Programs providing service coverage to every school system in the state. In fiscal year 2009, the Program served 5,471 students, including full-day and part-day students.

Each student's needs are identified in an Individualized Education Program (IEP) and the student's progress towards meeting the IEP goals is assessed at least annually. Currently, individual Programs determine how and what services will be provided based upon a student's IEP Team recommendation. At the time of the audit, there was no mechanism in place to aggregate data on student performance in such a way that it could be used to assess individual GNETS Programs' success at serving students. Additionally, results on standardized statewide assessments are not aggregated for this group of students. During the course of the audit, GaDOE implemented a new data collection tool that will allow it to collect student-level information that can be aggregated. We analyzed GNETS student data to calculate graduation, dropout, and transfer rates; to identify proficiency on state assessments; to calculate the time spent in the Program; and to calculate the rate of return to the original education setting in order to determine how well students served in a GNETS were performing. Based on behaviors and other factors common to the GNETS population, it is not expected that they would perform as well as the general student population. However, there was also a significant gap between the performance of students in GNETS and the performance of Students with Disabilities (SWD).¹ Below are some of the rates we identified. These points are discussed in more detail in the body of the report.

- 10% (143 of 1,457) of the high school students served by the GNETS Program during the 2004-2005 school year graduated with a regular diploma by 2009.
- 40% (582 of 1,457) of the high school students served by the GNETS Program during the 2004-2005 school year had not exited as graduates or other completers by 2009. The 582 students were coded as dropouts or transfers to another Georgia school who never re-enrolled.
- 28% (2,502 of 8,840) of Criterion-Referenced Competency Test (CRCT) scores for the GNETS students served during the 2008-2009 school year met or exceeded standards.
- Compared to the SWD population, GNETS students scored 26-36 percentage points lower on all CRCT subject area tests.
- 30% (170 of 565) of Georgia High School Graduation Test (GHSGT) scores were coded as proficient for GNETS students served during the 2008-2009 school year.
- Compared to the SWD population, GNETS students scored 28-42 percentage points lower on all GHSGT subject area tests.
- Once assigned to a GNETS Program, students were served an average of 4 years; as a result of the length of time services are provided, average cost per student served is \$56,000 (according to fiscal year 2009 program records) over the period.
- 43% (1,892 of 4,358) of the students served during the 2004-2005 school year had returned to their home school as of the latest data available. The remaining 57% of students included 2,296 (53%) still in a GNETS Program and 170 (4%) in more restrictive placements.

In order to effectively manage the GNETS Program, GaDOE should establish measurable goals focused on student outcomes and progress. Determinations should be made regarding expectations for the performance of this population as a whole as well as the students individually. Overall, GaDOE should ensure that the GNETS Programs are held accountable for the instruction and services provided to their students and action is taken, as necessary, to correct deficiencies so that these students are able to develop appropriate behaviors and demonstrate academic and vocational skill.

¹ GNETS students are included in the Students with Disabilities (SWD) subgroup and therefore are included in all SWD data.

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Audit Purpose

The purpose of this audit was to determine if the Georgia Network for Educational and Therapeutic Support (GNETS) is fulfilling its purpose of (a) keeping students from higher cost residential placement and (b) returning students to their general education setting. The audit team also sought to determine if the program had appropriate and achievable goals that were specific to the program and were measurable. Finally, the audit team reviewed the Georgia Department of Education's (GaDOE's) stewardship of the state and federal funds used to operate the program. Details about our objective, scope, and methodology are included in Appendix A.

This report has been discussed with appropriate personnel representing GaDOE. A draft copy was provided for their review and they were invited to provide a written response, including any areas in which they plan to take corrective action. Pertinent responses have been included in this report as appropriate.

Background

GNETS Overview

The Georgia Network for Educational and Therapeutic Support (GNETS) is a GaDOE special education program that serves students ages 3-21 with emotional and behavioral disorders of such *duration, frequency and intensity* that they require specialized instruction and therapeutic interventions that may be provided in general, special education, and/or separate GNETS classrooms. State Board of Education rules define the purpose of GNETS as *prevent[ing] children from requiring residential or other more restrictive placements by offering cost-effective comprehensive services in local areas and to support the [school system's] continuum of services by providing comprehensive special education and therapeutic support for the children served.* GNETS is made up of 24 Programs providing service coverage to every school system in the state. According to State Board of Education Rules, GNETS Programs are to include child specialists such as educators, *psychologists, social workers, psychiatrists, and behavior support specialists* who collaborate to help students with emotional and behavioral disorders. While attending GNETS, all students remain on the rolls of their home school, as, according to GaDOE, GNETS Programs are not schools.¹ All GNETS program data for students, such as test scores and outcomes (dropout, graduation rates) are reported as part of the students' home school's figures.

GNETS serves students exhibiting emotional and behavioral disorders of such "duration, frequency and intensity" that they may be educated in a separate environment from other students.

History

The GNETS Program was established and first received funding from the state legislature in 1972, and was initially known as the Georgia Psychoeducational Network (GPN). (The name changed to GNETS in July, 2007.) The creation of the GPN as a statewide program was initiated following the success of a three-year demonstration project (1969-1972) at the Rutland Center in Athens, Georgia (see Exhibit 1 on the following page). Rutland was formed through the coordinated efforts of mental health and education groups in the area. The Program's day-treatment model was designed to serve children, ages 2-14, who had serious emotional disturbances and had previously been served in more restrictive placements, such as secure mental health hospitals. Evaluations were delivered at

¹ The DeKalb-Rockdale Psychoeducation Center is the only exception. This GNETS is a Georgia school with a principal. As a result, this GNETS reports its own test scores and outcomes.

**Exhibit 1
Georgia Psychoeducational
Network (GPN) Key Dates**

- 1969** Three-year pilot project at the **Rutland Center** in Athens, GA serving children with SED in a day treatment program. Children served annually: **267**
- 1971** *Governor's Commission to Improve Services for Mentally and Emotionally Handicapped Georgians* report released recommending development of a statewide Psychoeducation network based on the success of the Rutland pilot.
- 1972** Georgia General Assembly creates the **Georgia Psychoeducational Network (GPN)** on July 1st, 1972 to provide mental health and educational services to children with SED. 24 GNETS Programs created in three phases. 1972-1973 Children served: **1,200**
- Phase 1**
Rutland Academy, Athens
Coastal Georgia Comprehensive, Savannah
Coastal Academy, Brunswick
Horizon Academy, Valdosta
Pathways Educational Program, Thomasville
Burwell Program, Carrollton
Harrell Learning Center, Waycross
- 1973** **Phase 2**
Flint Area Learning Program, Americus
Northstar Educational and Therapeutic Program, Dalton
Heartland Academy, Dublin
Alpine Program, Gainesville
Elam Alexander Academy, Macon
GNETS of Oconee, Milledgeville
Northwest Georgia Educational Program, Rome
River Quest Program, Waynesboro
- 1975** **Phase 3**
Oak Tree Program, Albany
Sand Hills Program, Augusta
Woodall Program, Columbus
Mainstay, Griffin
Cedarwood Program, Statesboro
North Metro GNETS, Atlanta
South Metro GNETS, Atlanta
H.A.V.E.N. Academy, Smyrna
DeKalb-Rockdale Psychoeducation Center, Lithonia
- The **Individuals with Disabilities Education Act (IDEA)** enacted. Requires special education students to be educated in the least restrictive environment.
- 1990** Georgia O.C.G.A. 49-5-220 creating **Systems of Care (SOC)** for children with SED. Requires that Georgia Mental Health and Education Departments cooperate on service provision for children with SED.
- 2002** **No Child Left Behind (NCLB)** signed into law. Students with Disabilities (SWDs) are required to make Adequate Yearly Progress (AYP) goals toward proficiency in reading and math by 2014.
- 2007** GPN name changed to **Georgia Network for Educational and Therapeutic Supports (GNETS)**.

Source: Georgia Psychoeducational Network historical documents, state and federal laws

the beginning, middle, and end of each child's 10-week treatment cycle to gauge progress toward goals in the areas of behavior, communication, socialization, and academics. Average treatment time in the Program was one year. Children were also tracked and evaluated for twelve months after exiting the Program and, according to reports, 90% of children served were returned to regular school placement without the need for additional referral.

Based on the success of Rutland, it was recommended that the Georgia Psychoeducational Network (GPN) be established, which would replicate the Rutland Center statewide. The goal of the GPN was to *provide services to severely emotionally and behaviorally disturbed children which will enable them to participate in regular educational programs and pursue a normal course of education or social adjustment, eventually holding jobs and participating as productive members of society and thereby reducing or eliminating the need for extended state support.* Guidelines included keeping children enrolled in regular school while receiving therapeutic services, drawing together professionals from mental health and special education, and developing a system for ongoing evaluation of treatment and effectiveness, which would include academic and behavioral evaluations.

The plan was approved by the state's Board of Education and Board of Health and the General Assembly provided funding through the "Severely Emotionally Disturbed (SED)" budget line item, establishing the GPN effective July 1, 1972. Local school districts submitted proposals for operating a center and state funds were provided via contracts between GaDOE and the Department of Human Resources (DHR). Local mental health programs were provided funds to support the clinical portion of the Program and GaDOE provided funds for the special education portion. Services were to be made available to any child in Georgia within a thirty-minute drive, so the geographic areas were created to meet this requirement and to largely coincide with existing local mental health districts. A network-wide evaluation system was also established to judge the success of the GPN program.

Over time, the Program has expanded to serve students ages 3-21. The eligibility for GNETS services continues to be behaviorally based, with the student exhibiting emotional and behavioral disorders of such *duration, frequency, and intensity* that they require specialized instruction and therapeutic interventions that may be provided in general, special education, and/or separate GNETS classrooms. GaDOE currently provides funding; DHR does not fund GNETS services.

Laws Governing Special Education Services

Laws at the state and federal level govern the provision of services to students with disabilities. These laws, as well as the reporting requirements defining services for these students, are discussed in more detail below.

- The U.S. Individuals with Disabilities Education Act (IDEA) (P.L. 108-446)², requires that all students with disabilities be provided access to a *free appropriate public education* in the *least restrictive environment*. The Code of Federal Regulations (CFR Title 34 Part 300) designates 12 categories of student disability with criteria for eligibility. Students served by GNETS are most often categorized as having the disability *serious emotional disturbance*. States are required to develop processes for identifying and evaluating students with disabilities and ensuring that students with disabilities receive special education and related services. Students identified as having a disability must be provided an Individualized Education Program (IEP). An IEP is a written plan detailing the student's present level of academic achievement, measurable annual goals, duration of special education services, student placement (including placements such as GNETS), etc. IEPs are written by collaborative teams of local personnel familiar with the student. IDEA requires that IEP teams include the child's parents, special and/or regular education

Categories for Student with a Disability

1. Mental retardation
2. A hearing impairment
3. A speech or language impairment
4. A visual impairment
- 5. A serious emotional disturbance**
6. An orthopedic impairment
7. Autism
8. Traumatic brain injury
9. Other health impairment
10. A specific learning disability
11. Deaf-blindness
12. Multiple disabilities

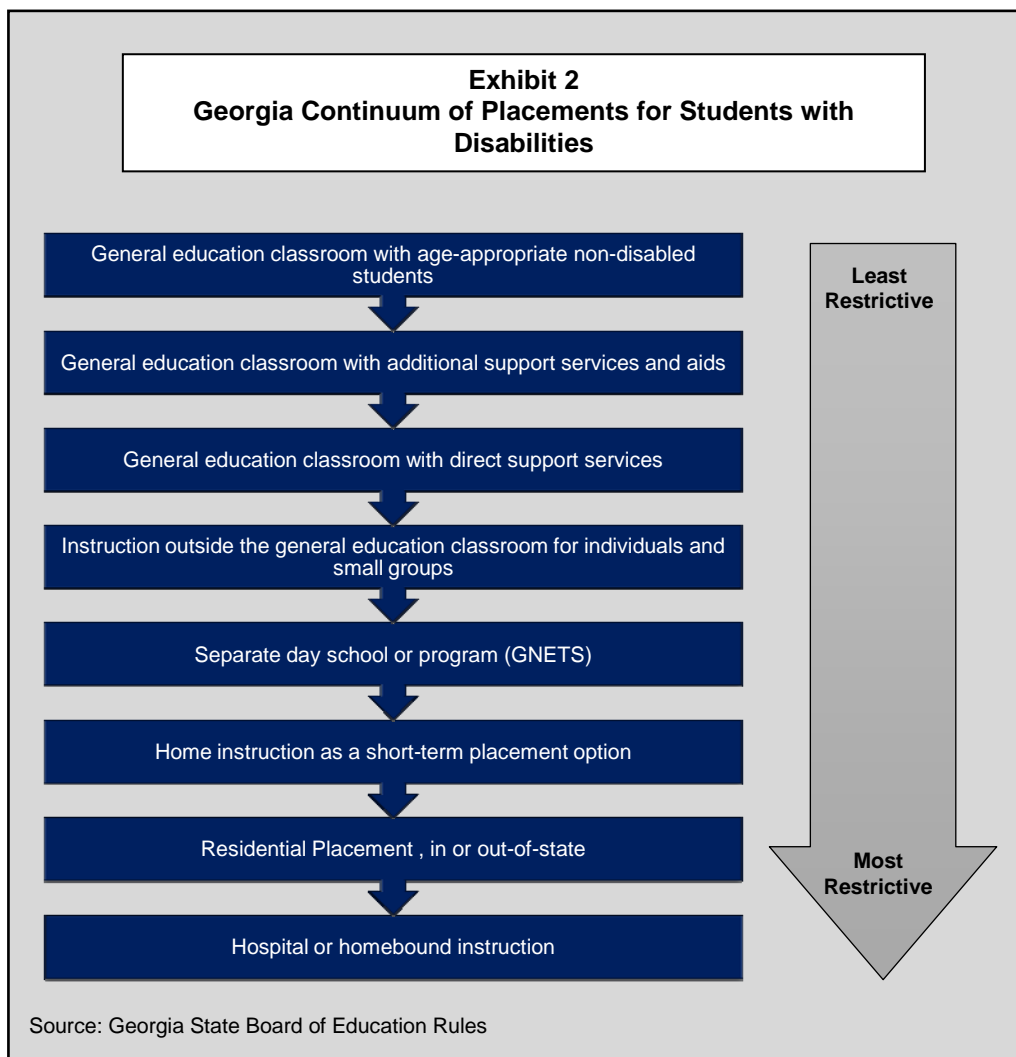
teachers, a school system representative, and may include other individuals who have knowledge or expertise regarding the child, including related service personnel and whenever appropriate, the child with a disability. The team meets at least annually to assess progress towards the plan goals and to make adjustments as necessary.

The CFR also requires that students with disabilities be, to the *maximum extent appropriate*, educated in the same classroom with non-disabled students and provided access to the same educational and extracurricular options. School systems are required to ensure that a *continuum of placements* is available for students requiring them; students must be able to access separate schools (e.g., GNETS Programs) and more restrictive placements such as hospital and residential facilities when needed. See **Exhibit 2** on the next page for the continuum of placements for Students with Disabilities (SWD) in Georgia. If a special education student's disability is such that he or she requires a residential placement, the placement (including any non-medical care and room and board) must be provided at no cost to the parent.

IDEA requirements apply to every state that receives IDEA funds and all public agencies within the state involved in the education of students with disabilities. Under IDEA, states are required to monitor local school systems and enforce measures of performance to determine: (a) the extent that a *free appropriate public education* is being provided in the *least restrictive environment* to all students and (b) whether state efforts at identifying students with disabilities are adequate and whether monitoring of educational agencies is sufficient. States submit an

² The Education for all Handicapped Children Act (P.L. 94-142), was passed in 1975. It is currently enacted as the Individuals with Disabilities Education Act (IDEA) (P.L. 108-446) reauthorized in 2004.

annual performance plan (with goals updated at least every six years) to the U.S Department of Education (USDOE) reporting the above performance measures and the state's overall compliance with IDEA. See Appendix F for the SWD goals and indicators in GaDOE's Fiscal Year 2005-2010 State Performance Plan.



- **No Child Left Behind Act of 2001 (P.L. 107-110)** states that students with disabilities are responsible, as a sub-group of the student population, for making Adequate Yearly Progress (AYP) towards federal goals for reading and math by 2014.

In Georgia, Students with Disabilities (SWD) are measured for academic proficiency using the same state-standardized testing as students without disabilities; the Criterion-Referenced Competency Test (CRCT) for 1st through 8th graders and the Georgia High School Graduation Test (GHSGT) for 11th graders. Passing the GHSGT is a requirement for graduation in Georgia. Some students who receive special education are administered the Georgia Alternate

Assessment (GAA)³ rather than the CRCT or GHSGT if their disability requires it. In fiscal year 2009, fewer than 1% of students were administered the GAA.

- **State Plan for Coordinated System of Care** (O.C.G.A. 49-5-220) (1990) states that services for children with severe emotional disturbances should be delivered through a coordinated and comprehensive System of Care (SOC) consisting of early identification, prevention, early intervention, prevention of removal of severely emotionally disturbed youth from their homes or placement out of state. The goal of the SOC is to provide youth with severe emotional disturbances *appropriate educational, nonresidential and residential mental health services, and support services, as prescribed in an individualized plan*. According to this statute, the Department of Behavioral Health and Developmental Disabilities (DBHDD) is responsible for *planning, developing and implementing* the coordinated system of care for youth with severe emotional disturbances while GaDOE must *provide appropriate education in accordance with (IDEA)* in order that youth with severe emotional disturbances *develop appropriate behaviors and demonstrate academic and vocational skills*. The statute notes that a child or adolescent can be identified as severely emotionally disturbed by DBHDD for mental health services or by GaDOE for educational purposes. However, it should be noted that eligibility for receiving services differs among these agencies. As a result, the agencies may not recognize the same population of children and receiving services from one agency does not guarantee services from the other.

GNETS Program Structure

Each of the 24 GNETS Programs serves a catchment area of multiple county and/or city school systems. Program coverage is statewide (see **Exhibit 3** for a map of the Programs and **Appendix C** for more detail on each). Programs serve students in:

- General education environments with support services
- Special education environments with direct services
- GNETS Centers (separate school facilities specifically for GNETS students)

A GNETS Program may be made up entirely of centers or separate classrooms but most have a mix of both types of environments. There are a total of 194 GNETS locations (44 centers, 148 separate classroom/public school locations, and 2 other locations).

According to State Board of Education Rules, the Programs are to include *educators, psychologists, social workers, psychiatrists, and behavior support specialists* who collaborate to help students with emotional and behavioral disorders. GNETS students attend classes where they are provided a curriculum of instruction per the Georgia Performance Standards (GPS) by special education teachers with additional support from paraprofessionals. GNETS classes have fewer students with a higher ratio of instructional personnel to students than in regular schools. According to Program staff, most GNETS classes operate on a model of embedded instruction, with therapeutic interventions occurring while students are being taught the GPS

³ The GAA is a portfolio of student work samples used to capture learning and achievement in four content areas (English, Math, Science, and Social Studies) for students with disabilities who are exempt from standard statewide assessments due to the severity of their disability.

material. However, there is no standard therapeutic intervention model used by all Programs.

Because GNETS Programs are educational placements, not schools, students attending GNETS Programs remain on the academic rolls of their home schools. As noted earlier, the students' test scores and outcomes (i.e., dropout, graduation rate, etc.) are reported by the home school as part of its overall outcomes. Students are served on either a full-time or part-time basis and in most cases are bused by their home school system to and from GNETS facilities.

Population Served

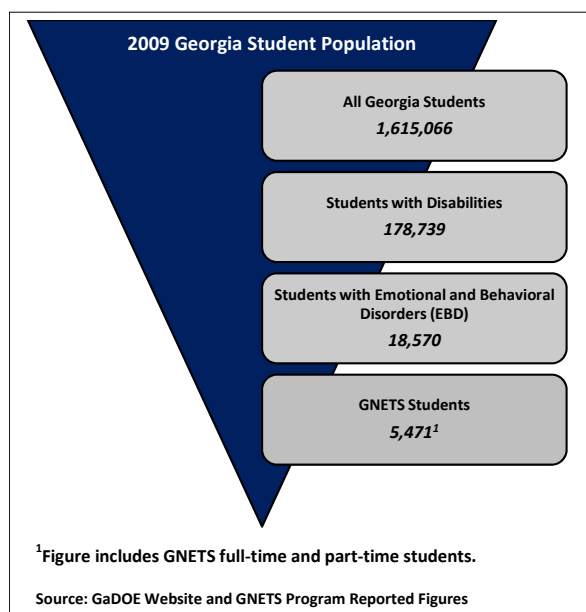
GNETS students exhibit classroom behaviors so severe that IEP Teams recommend they receive specialized instruction and therapeutic interventions that may be

provided in general, special education, and/or separate GNETS classrooms. The behaviors meet one or more of the conditions of Emotional and Behavioral Disorders⁴ (EBD) described in the State Board of Education Rules:

- *An inability to build or maintain satisfactory interpersonal relationships with peers and/or teachers.*
- *An inability to learn which cannot be adequately explained by intellectual, sensory or health factors.*
- *A consistent or chronic inappropriate type of behavior or feelings under normal conditions.*
- *A displayed pervasive mood of unhappiness or depression.*
- *A displayed tendency to develop physical symptoms, pains or unreasonable fears associated with personal or school problems.*

According to the State rules, *a child with EBD is a child who exhibits one or more of the above emotionally based characteristics of sufficient duration, frequency and intensity that interferes significantly*

with educational performance to the degree that provision of special educational service is necessary. Of the 502 GNETS student files reviewed during the audit, 327 contained disability eligibility information; 299 of the 327 (91%) cited EBD as the primary or secondary disability category. According to estimates by the U.S. Department of Education (USDOE) and studies we reviewed, severely emotionally disturbed students account for 1% to 2% of the total student population. In fiscal year 2009, Georgia students with EBD made up 1.2% of the total student population (18,570 of 1,615,066 students). According to GaDOE records, approximately 11% of all students are designated as students with disabilities and of that approximately 10% meet the criteria for EBD. In fiscal year 2009, 5,471 GNETS students were served. The number of students being served by GNETS Programs has been decreasing over time, from a high of 5,910 in 2005 to current levels.



⁴ It should be noted that different terms are often used to refer to the same population of students. For example, Emotional Disturbance, Emotional and Behavioral Disorder, Serious Emotional Disturbance, Severely Emotionally Disturbed and Severely Emotionally and Behaviorally Disturbed have all been used to refer to the same federally recognized disability category.



Characteristics of Students with Severe Emotional Disturbance (SED)

Students with emotional disturbances are categorized by extreme behaviors that may range from outbursts of aggressiveness and hyperactivity to severe withdrawal, depressive behavior, psychotic episodes, and/or suicidal tendencies. Students with emotional disorders are broadly characterized as having lower classroom engagement, higher levels of disruptive behavior, and poorer outcomes than other students with disabilities and all students as a whole. Studies have shown that students with emotional disturbances, as compared to students in the other 11 disability categories (see page 3) are:

- Least likely of all to be enrolled in any type of postsecondary school
- Most likely of all to be involved with the criminal justice system
- Most likely of all to drop out of school
- Least likely of all to graduate or complete high school
- Most likely of all to be educated separately from non-disabled students
- More likely than most to fail courses
- Most likely of all to achieve lower overall grade point averages
- Most likely of all to face disciplinary action

It should be noted that, while emotional disturbance is defined in IDEA as a disability, it is not a mental health diagnosis. However, the presence of mental health diagnoses was found to be common among a sample of GNETS students. The majority of GNETS students we reviewed had records indicating the presence of at least one mental disorder diagnosis and 70% (352 of 502) had multiple diagnoses.⁵ The average student had two to three disorders. Of the 502 student files we reviewed, only 52 (10%) had no documented mental health diagnosis. The most common disorder groups among the sample students were Attention-Deficit/Disruptive Behavior Disorders (74% (373 of 502)) and Mood Disorders (39% (195 of 502)). Students with Pervasive Development Disorders such as Autism and Asperger's accounted for 12% (58 of 502) of the diagnoses in our sample. Additionally, 48% (243 of 502) of the students' files include descriptions of aggressive behaviors towards Program staff and other students including threatening, defiance, destructive behaviors, and fighting.

GNETS Program Finances

The GNETS Program is funded through state and federal funds. Federal funds come from a discretionary allowance in the state's annual portion of IDEA funding. State funds are provided by the General Assembly in an annual appropriation. In fiscal year 2010, GaDOE awarded grants to the GNETS Program totaling \$77 million. (See Exhibit 4 on the next page.) According to GaDOE, a total of \$72 million (\$64 million in state funds and \$8 million in federal funds) was actually drawn down by the GNETS Programs during the state fiscal year. The remaining federal funds will be drawn down according to federal grant guidelines, which allow for 27 months to expend federal funds.

⁵ GNETS students must meet one or more of the conditions described on page 6, which are outlined in State Board of Education Rules. A mental health diagnosis is not required.

There are four GaDOE staff (totaling less than one full-time staff person) at the Central Office supporting the GNETS Program.⁶ GaDOE staff are funded through federal IDEA funds set aside specifically for administration. Additional support is provided to the GNETS Program by the Positive Behavioral Support office and by local school systems, which currently are required to provide textbooks, test materials, student transportation, and additional supports required by the students' IEPs. Our review found that most systems are providing additional in-kind or direct support; however, GaDOE does not currently collect information on how much local systems are providing to the GNETS Programs other than additional staffing positions provided.

Exhibit 4				
GNETS Program Fund Sources and Expenditures				
Fiscal Years 2008-2011				
Fund Sources	2008 (actual)	2009 (actual)	2010¹ (actual)	2011² (budgeted)
State Funds	\$69,316,047	\$68,007,363	\$64,155,879	\$65,573,814
Federal Funds ⁴	\$11,840,054	\$11,152,988	\$12,797,774	7,833,572
Total Funds	\$81,156,101	\$79,160,351	\$76,953,653	\$73,407,386
Program Expenditures				
GNETS State Grant	\$69,316,047	\$68,007,363	\$64,155,879 ³	N/A
GNETS Federal Grant ⁴	\$11,840,054	\$11,152,988	\$12,797,774	N/A
Total Funds	\$81,156,101	\$79,160,351	\$76,953,653	N/A
¹ Fiscal Year 2010 expenditures unaudited.				
² Fiscal Year 2011 expenditures not available at time of report printing.				
³ State funds include \$78,928 for the Georgia Special Needs Scholarship (GSNS)				
⁴ Federal funds include actual program disbursements as well as additional obligations that were recorded as payables, but not expended, during the fiscal year. For Fiscal Year 2011, the additional obligations from prior years will not be recorded until the federal fiscal year closes.				
Source: GaDOE Budget Documents and PeopleSoft Reports				

State funding for each GNETS Program is determined using a formula based on the number of students served. (See Appendix D for funding by Program from fiscal years 2005-2010.) All state GNETS positions are funded in the formula. Annually, individual GNETS submit proposals describing how services are provided, the number of students served - by school system - for the prior year, the number, location, and type of facilities, and annual budgets detailing how Program dollars will be expended. The majority of GNETS expenses are for instruction (66% in fiscal year 2009).

It should be noted that, while school systems are required to contribute a local match to state funds for K-12 education, the match is not required for GNETS students. Therefore, when a student is moved to a GNETS, the local dollars are not required to follow the student to the GNETS Program. In terms of state and federal funds, GNETS Programs are funded for a full year of services for each student who spends at least ten consecutive days in the Program at any point during the academic

⁶ According to GaDOE, the time allocations for the four staff are: a program specialist (.50 FTEs), program manager (.25 FTEs), director (.10 FTEs), and budget specialist (.10 FTEs).

year. However, if the student was also in his or her home school on either or both of the two dates during the school year when students are counted to determine state K-12 funding, the home school and the GNETS would be funded for services for the same student.

O.C.G.A. 20-2-152 requires that GaDOE distribute GNETS funds to local area fiscal agents. By statute, the fiscal agent must be either a local school system or a Regional Educational Service Agency (RESA). The fiscal agent is responsible for hiring staff and providing facilities, materials, and supplies. Fiscal agents are also required to sign assurance statements prior to funds being released. The assurances include requirements that fiscal agents and GNETS directors coordinate with local school systems to ensure that facilities and technology resources are maintained, textbooks and materials are provided, all employees are fingerprinted, etc.

GNETS Program Management

The GNETS Program is managed by GaDOE's Division for Special Education Supports under the Office of Innovative Instruction, and includes the Positive Behavior Supports program manager and an EBD program specialist. The majority of GNETS data reported to GaDOE comes directly from the GNETS Programs, compiled by the GNETS directors, and reported in an annual report. The twenty-four GNETS Program directors formed a GNETS Directors' Association, which conducts meetings to discuss and share information and elect an Association President. Currently, GaDOE monitors Program performance through Focused Monitoring site visits to two Programs each year, based on the Georgia Continuous Improvement Monitoring Process (GCIMP). Programs are selected based on their relative ranked performance as reported on the GNETS Annual Report. Review teams, composed of GaDOE Special Education employees, a GNETS director and a county special education director examine the Program's facilities, policies and procedures, instructional programs, student achievement, and behavioral concerns as they pertain to IDEA regulations. At the conclusion of the review, a Corrective Action Plan is developed if needed. GaDOE personnel also recently conducted Safety Assessments of some GNETS Program facilities and made recommendations for repairs.

During the course of the audit, GaDOE personnel, including Division for Special Education Supports personnel, proposed a state rule containing new guidelines for the use of seclusion and restraint in all Georgia schools to the Georgia State Board of Education which was adopted by the State Board of Education in July 2010. The rule states that seclusion is prohibited and physical restraint should only be used *in those situations in which the student is an immediate danger to himself or others and is prohibited...as a form of discipline or punishment.* The rule defines physical restraint as *direct physical contact from an adult that prevents or significantly restricts a student's movement* and distinguishes four types of restraint as physical, chemical, prone and mechanical. Physical restraint is person to person contact to restrict a student's movement to ensure his safety as well as that of others. Mechanical, chemical, and prone restraint are prohibited.

The rule also states that staff should receive training on the proper use of restraint techniques. To that end, GaDOE has recently begun assisting with the funding for training of GNETS personnel in proper restraint techniques, whereas previously the programs funded the training themselves. The rule also notes that parents should be

notified of any school or Program's use of these practices and further notified of any instance of their use on their child. During the audit team's visits to eight GNETS Program sites in 2009, GNETS Program Directors and personnel indicated that students were no longer secluded in locked rooms without supervision (some of the Programs visited by the team had gone so far as to remove the doors from their seclusion rooms).

Other States

Our analysis of five other states found that the EBD population is served through varying service models at the state and local level. While some states provided services through collaboration with state mental health agencies, state universities, and academic research institutions, none of the states contacted could provide data indicating the effectiveness of student outcomes or overall costs for comparison to GNETS. None of the states provided services in the same manner as Georgia. Descriptions of the models we identified are included in **Appendix B**.

In addition, we contacted six other experts, including professionals and professors in the fields of special education and school-based mental health. The experts offered various recommendations as to the best model for educating EBD students, but could not supply the team with supporting outcome data. At least one expert we contacted advocated the full inclusion of students in the regular school environment, regardless of the severity of the student's disorder. Others advocated that the education agency provide all necessary resources for treating the mental health needs of students identified as EBD, up to and including providing mental health behavioral services outside the school day, providing family support services, and utilizing evidence-based programs such as Multi-Systemic Therapy (MST) and Functional Family Therapy (FFT). U.S. Department of Education officials contacted by the audit team could not identify any best practices for students with EBD. Georgia's special education contact further noted that the U.S. Department of Education's primary IDEA compliance monitoring tool for students placed in a GNETS-type setting because of a disability consists of entirely state-reported figures. Multiple studies reviewed by the audit team concluded that there is a lack of outcome data on students with EBD, and also agreed that the most effective method of measuring success of the treatment of these students is to conduct a longitudinal study on the population.

Findings and Recommendations

GaDOE should ensure that GNETS Programs are providing education and services that enable students to develop appropriate behaviors and demonstrate academic and vocational skills.

Currently, GaDOE cannot demonstrate that the services provided to a student in the GNETS Program have resulted in improvements to behavior or academic performance. According to O.C.G.A. § 49-5-220, GaDOE must ensure the provision of appropriate education, in accordance with IDEA, to enable children with severe emotional disturbance *to develop appropriate behaviors and demonstrate academic and vocational skills*. Given the vulnerability of this population and the amount of state resources expended, there is an increased need for accountability. In 1972, Georgia decided to serve these students through a separate program. In fiscal year 2010, funding for the Program totaled \$64 million in state funds (\$72 million total funds). The funding is based on smaller ratios of students to teachers, more therapeutic staff, and other support. Currently, individual GNETS student's performance is tracked and the students participate in statewide assessments. However, data is not evaluated to determine whether the funds provided to serve these students are having the desired impact. Additionally, data has not been collected in a way that it can be aggregated at the state level and used to assess a GNETS Program's performance against a standard. In addition, GaDOE has not established standards or specific goals that the Programs must meet to be performing adequately.

- **GNETS Programs are not held accountable for student performance.** Individual students are placed in GNETS because their behaviors are such that IEP Teams decide the students cannot function in a regular classroom setting and the behaviors are impacting their academic performance. However, GNETS Programs are not held accountable for the instruction and services that should impact students' ability to return to their regular education placement. Under the current structure, the only measure of student success is at the individual level. IEPs are specifically designed to include goals and measure progress toward those goals for an individual student; therefore, meeting IEP goals may not require academic or behavioral improvement to the degree necessary to return to the regular education environment. As a result, the number or percentage of students meeting their IEP goals cannot be used as a measure of the GNETS Programs' overall effectiveness at returning students to their home school.

Each GNETS student's performance on academic tests and in overall outcomes, such as graduation or dropout rates, is reflected in the scores and rates of his or her home school. For example, if a student from Baldwin High School is placed in a GNETS and is served there for four years, his CRCT and GHSGT scores are all reported by Baldwin High School and impact that school's ability to meet Adequate Yearly Progress (AYP) as required by NCLB. Currently, there is no mechanism in place to hold the GNETS Program accountable for the services it provides and the impact of those services on student performance. In fiscal year 2009, only half of all Georgia schools (1,120 of 2,233) placed a student in a GNETS Program and of those

schools only 5% (53 of 1,120) placed more than 10 students. Given the small number of students placed in GNETS, it is unlikely that GNETS students' assessment scores (if poor) would adversely impact the schools' scores.

- **Program data is not available in a way that it can be aggregated to allow for analysis of individual Program's effectiveness.** While individual GNETS Programs may collect information on student performance as they deem necessary, it has not been used to establish benchmarks, set targets, or assess the instruction and services provided either at the Program or network level. It should be noted that in the 2009-2010 school year, GaDOE implemented a new process for collecting student level data from each of the GNETS Programs. GaDOE should ensure that the data is collected and used in such a way that it can inform management decisions regarding Program effectiveness.
- **There is no assurance that GNETS is a cost-effective placement for providing these services.** Assessment of cost effectiveness requires an ability to assess a cost per *successful* outcome and the cost of inputs to the Programs. Information on GNETS' total expenditures does not include all local contributions or other leveraged resources. Absent more complete cost information, GaDOE cannot compare GNETS placement with alternative placements. According to the State Board of Education rules, GNETS is designed to: *prevent children from requiring residential or other more restrictive placements and to support the [school systems'] continuum of services by providing comprehensive special education and therapeutic support for the children served.* However, this statement assumes that students would enter residential treatment facilities or more restrictive placements if not for the GNETS Program. In addition, while the comparison to residential costs may have been appropriate when a residential facility was the source of the students, as was the case in 1972 when the pilot program started, or if it was the only remaining step on the continuum, that is not currently the case. GaDOE describes the GNETS' goal as *return[ing] SED students to their general education setting*, but it has not defined performance measures to determine if the Program is meeting the goal. A Program could return students to their original education environment and be deemed successful, even if the students ultimately dropped out of school.

In an effort to determine outcomes and assess overall Program performance, the audit team analyzed student outcomes as a proxy measure for academic and behavioral progress. We analyzed data on graduation, dropout, and transfer rates; proficiency on state assessments; time spent in the Program; and the rate of return to the original education setting. It is expected, based on behaviors and other factors common to the GNETS population, that, as a group, they would not perform as well as the general student population. However, there was also a significant gap between GNETS student performance and the rates for the Students with Disabilities (SWD) population.⁷

In order to effectively manage the GNETS Program, GaDOE should apply measurable goals focused on student outcomes and progress. Determinations should be made

⁷ GNETS students are included in the Students with Disabilities (SWD) subgroup and therefore are included in all SWD data.

regarding expectations for the performance of this population as a whole as well as the students individually. Overall, GaDOE should ensure that the GNETS Programs are held accountable for the services provided to their students and action is taken, as necessary, to correct deficiencies so that these students are able to develop appropriate behaviors and demonstrate academic and vocational skill.

Agency Response: GaDOE agrees that the State should monitor the GNETS programs to ensure they are providing appropriate education to enable students to develop appropriate behaviors and demonstrate academic and vocational skills, but disagrees that it is not doing this already. GaDOE believes that it does monitor the progress of students served by GNETS through its performance targets for all students with disabilities (of which GNETS students are a subset) and the goals identified in Individualized Education Programs (IEPs). GaDOE also noted that, during the course of the audit, it instituted a program level file to help better monitor GNETS programs. The program level file was included as a reporting requirement for GNETS students in the 2009-2010 school year. The program level file should provide the State with the ability to disaggregate the data on performance targets from the local district data. GNETS students' state assessment scores are coded with a GNETS program identifier allowing their academic performance data on mandated statewide assessments to be reported to each local school district and to the GNETS program.

DOAA Response: As noted in the report, GaDOE is not holding the GNETS Programs themselves (24 in all) accountable for the separate instruction and services they provide to students. We agree that there are measures in place for all students with disabilities that provide some accountability for the instruction provided. However, GNETS student information is included as part of the entire population of students with disabilities and, at the time of our review, was not disaggregated in a manner that would allow GaDOE to separately assess the performance of each GNETS Program or GNETS students as a group. Additionally, we agree that the IEPs provide for assessment of individual student progress; however, again, the information cannot be aggregated to assess the performance of individual GNETS Programs or GNETS students as a group. We concur that implementation of the program level file should provide the GaDOE with the ability to disaggregate data in a manner that would allow it to hold an individual GNETS Program accountable for the instruction and services they provide to students.

Graduation rate, dropout rate, and post-secondary outcomes for GNETS students are well below those same rates for the Students with Disabilities (SWD) population.

GNETS students account for approximately 2-3% of all Students with Disabilities (SWD). As a result, GNETS's students are also included in all percentages for SWD.

Currently, GNETS students' graduate at a significantly lower rate and drop out at a higher rate than Students with Disabilities (SWD) as a whole. Additionally, GNETS students are much more likely to be unengaged (meaning not employed or enrolled in any type of post-secondary program, not attending a sheltered program or on a waiting list for services from another agency) one year after leaving school than those in the SWD population. Under NCLB, states are required to take steps to close the gap between the performance of the SWD population and the general student population. Performance is measured and annual targets are set to show progress towards closing the gap (see Appendix F). However, GNETS Programs are not required to measure outcomes separately and there are no federal requirements that the GNETS subpopulation perform at a particular level, aside from the requirements for the SWD population as a whole. In order to ensure the Program is

having the intended effect, however, GaDOE should identify targets to indicate how the performance should relate between these two groups. We identified a cohort of 1,457 high school students served by the GNETS Program during the 2004-2005 school year and reviewed five years of data to determine the current placement or outcome (defined as graduation, other completer, dropout, or transfer) for these students. The results are discussed below.

- As shown in **Exhibit 5** on the next page, 40% of the cohort (582 of 1,457) exited the Program either as a dropout or they were identified as a transfer to another Georgia school system but never re-enrolled.⁸ These 582 students were not program completers or graduates and this was the most common outcome for students in the cohort. Five Programs (Rutland, Heartland, Oconee, Pathways and Alpine) had over 50% of their students drop out or transfer to another school system in Georgia, but never show up at another system during the five years. This same data was not available for the SWD population.

The annual dropout rate is calculated as the number of high school students who drop out in a year divided by the total number of high school students. For the 2007-2008 school year, the dropout rate for SWD was 5.3%. For the 2007-2008 school year, there were 1,611 GNETS high school students and there were 123 dropouts by GNETS students contributing to a dropout rate of 7.6%.⁹

- Only 10% (143 of 1,457) of the cohort graduated within five years with a regular diploma.¹⁰ It should be noted that 28% (408 of 1,457) of the students in the cohort received special education diplomas within five years and 2% (23 of 1,457) received a certificate of performance.¹¹ Students receiving these designations are not counted as graduates but are counted as other completers. See **Appendix E** for other completers by Program. As shown in **Exhibit 5**, the percentage of students graduating during this period ranged from 0% (Alpine Program and GNETS of Oconee) to 20% (Oaktree). All of the students in the cohort were in 9th grade or higher in the 2004-2005 school year; therefore, technically, all had the possibility of graduating by the end of the 2008-2009 school year (five years later).

For the 2008-2009 school year, the graduation rate¹² for the SWD population was 41.4%. A graduation rate is not calculated separately for the GNETS population by GaDOE. Our analysis of the cohort showed 10% (143 of 1,457) of 2004-2005 GNETS high school students graduated with a regular diploma by the end of the 2008-2009 school year. Our analysis allowed GNETS students five years to graduate and included all high school students as of

⁸ Transfer students are not counted in the dropout rate. Beginning in the 2010 school year GaDOE's data system will automatically match transfer students to their new school; if a student is coded as a transfer and does not reappear in another school's data, the original school will receive an error code and be required to re-code the student before submitting their data.

⁹ At the time data was requested, 2008-2009 school year data was incomplete.

¹⁰ Regular diplomas include college preparatory diplomas, vocational diplomas, and dual diplomas (vocational and college preparatory).

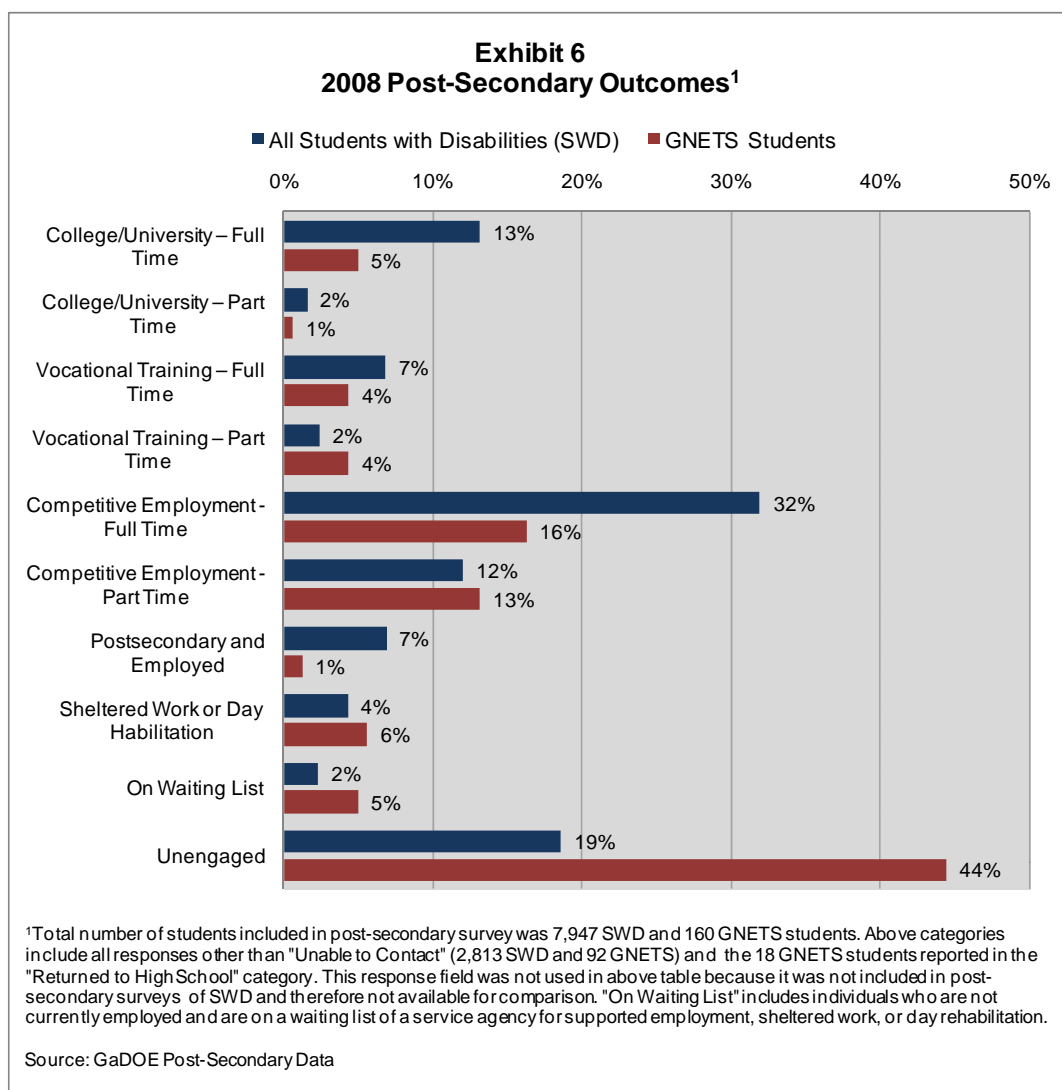
¹¹ A Special Education Diploma is awarded when a student meets the requirements of his/her IEP. A Certificate of Attendance is awarded when a student ages out of school upon reaching the age of 22.

¹² Graduation rate is calculated as the number of 9th graders who graduate four years later with regular diplomas divided by the total of: the number of dropouts, the number of regular diplomas, and the number of other completers.

2004-2005. As a result, our calculation of 10% is inflated compared to the official graduation rate calculation for students with disabilities (a four-year rate).

Exhibit 5			
2005 GNETS High School Students (Grades 9 - 12)			
Five Year Analysis of Academic Outcomes as of 2009			
(N=1,457 students)			
	GNETS Program	Regular Graduates as of 2009	Dropouts + Transfers¹ as of 2009
1	Alpine Program	0.0%	71.9%
2	Burwell Program	11.6%	37.2%
3	Cedarwood Program	8.7%	34.8%
4	Coastal Academy	7.5%	45.3%
5	Coastal Georgia Comprehensive Academy	9.8%	32.8%
6	DeKalb-Rockdale Program	9.8%	39.8%
7	Elam Alexander Academy	10.7%	35.7%
8	Flint Area Learning Program	4.0%	40.0%
9	GNETS of Oconee	0.0%	64.0%
10	H.A.V.E.N. Academy	9.5%	36.5%
11	Harrell Learning Center	16.7%	33.3%
12	Heartland Academy	4.8%	52.4%
13	Horizon Academy	11.5%	38.5%
14	Mainstay	8.2%	39.7%
15	North Metro Program	11.5%	38.8%
16	Northstar Educational and Therapeutic Services	14.3%	34.7%
17	Northwest Georgia Educational Program (NGEP)	19.2%	41.8%
18	Oaktree Program	20.0%	37.5%
19	Pathways Educational Program	4.4%	51.1%
20	River Quest Program	2.7%	45.9%
21	Rutland Academy	2.2%	57.8%
22	Sand Hills Program	7.0%	25.6%
23	South Metro Program	4.9%	28.0%
24	N/A ²	0.0%	41.7%
	TOTAL	9.8%	39.9%
<p>¹"Transfers" include those students coded with the withdrawal reason "Transferred to another public school system in Georgia" as their final outcome, but who are not recorded as having re-enrolled in another school system in Georgia according to GaDOE data.</p> <p>²The audit team did not assign a GNETS program to twelve students. Some of these students could not be tied to a specific GNETS program because GNETS personnel could not identify which program serves students from these schools. Additional students were tied to the Woodall GNETS whose data was found to be incomplete (see Appendix A); therefore, Woodall Program was not ranked separately. Both of these groups of students, however, are included in the totals calculation.</p>			
Source: GaDOE Full-Time Equivalent (FTE) Student Information System			

- GaDOE conducts post-secondary surveys of the SWD population one year after they leave school to identify their current status (e.g., post-secondary school, employment, unengaged). A total of 7,947 students responded to the 2008 survey; this total included 160 GNETS students. As shown in Exhibit 6 on the next page, according to the survey, 44% of the GNETS students were unengaged one year after leaving school, as compared to 19% for the whole SWD population. Additionally, GNETS students are less likely to be employed full-time or in school full-time.



As noted above, in all three areas reviewed, the performance of the GNETS population was significantly below that of the SWD population, even with the additional services being provided. GaDOE should have targets to allow for assessment of Program performance and improvement. For example, GaDOE could use the performance goals set for all SWD and either apply the same targets as for SWD or establish new targets. The results of these analyses could be used as a baseline to measure Program performance in the future.

Agency Response: GaDOE concurs that the State should monitor the GNETS programs to ensure that students in the GNETS program are measured against state targets for graduation rate, dropout rate, and post-secondary outcomes. This is required for all students with disabilities in the State with progress monitored against the targets in the State Performance Plan (SPP) and in the Annual Performance Report (APR). The data for these students is also included in the collection of data from local school districts. This data is measured against State targets in the SPP and APR.

The post secondary outcomes data is monitored for all students with disabilities in accordance with OSEP regulations each year and GNETS students are included in this monitoring.

GaDOE noted that during the course of the audit it established a program level file in the 2009-2010 school year, which should provide us the ability to monitor graduation and dropout rates for each GNETS program. These rates will be measured against state targets set in the SPP and APR.

***DOAA Response:** While GNETS student information is reported as part of the larger students with disabilities population, it was not disaggregated in a manner that would allow GaDOE to assess performance of individual GNETS Programs or of GNETS students as a group at the time of our review. To ensure the Program, which provides separate instruction and services, is having the intended impact, GaDOE should identify targets to indicate how the performance of GNETS students should relate to the students with disabilities population group. We agree that the program level file will provide information that can be used to monitor these rates for individual GNETS Programs.*

GaDOE should develop a methodology for tracking the academic progress of GNETS students, so that the academic impact of the Program can be measured.

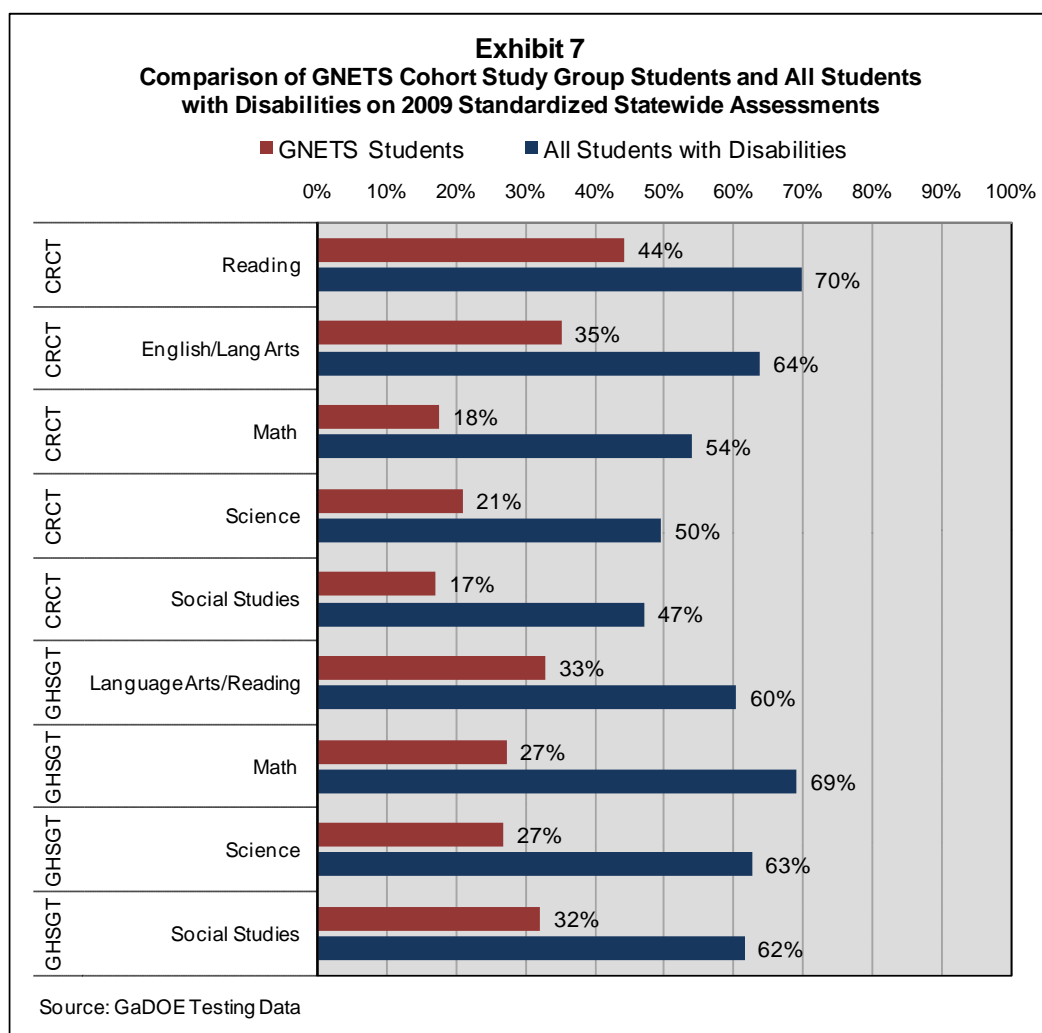
According to statute and state rule, GNETS is designed to address both academic and behavioral issues. Currently, however, Programs are not required to collect or report information to GaDOE in a way that would allow for analysis of the impact of individual Programs on student outcomes. In order to determine if GNETS Programs have been successful, baseline information, including current academic level and behavioral status, would have to be collected on all students entering the GNETS Program. Assessments could then be conducted when students exited the Program and the degree of progress in these areas could be measured. As discussed below, the Program is beginning to take steps to address the behavioral component. However, additional steps are necessary to allow for assessment of the academic impact of the Program. Absent measures of academic impact, the audit team reviewed scores on standardized tests and compared these to the larger SWD population to determine if the GNETS population was performing similarly, or, if not, what the gap was between these two groups.

- Behavioral progress of students will be assessed and tracked using the Emotional Behavior Problem Scale (EBPS). While the tool has been used in the individual GNETS sites over the years, its use has been inconsistent and the reporting of information has been at an aggregate level, without sufficient supporting information to allow for analysis. For example, a GNETS Program could have reported that 10% of students improved on their EBPS; however it was not clear how many students took the EBPS, over what time period, or whether all students had been in the Program for the same amount of time. As a result, the information was of little value.

Beginning with the 2009-2010 school year, GaDOE is requiring GNETS Programs to administer the EBPS at the beginning and end of each school year or upon entering and exiting the GNETS Program. Additionally, GNETS Programs will report information at the student level from these assessments. This will continue as an annual requirement.

- Academic progress of students is not currently measured across the GNETS Programs. However, GaDOE staff have noted that students entering GNETS Programs may be functioning well below grade level. While some individual sites have indicated they are measuring academic progress, the information is not reported to GaDOE in a manner that would allow for overall assessment of the GNETS Program.

According to GaDOE staff, successful behavioral intervention should result in improved performance on standardized statewide assessments. We analyzed GNETS student scores on the CRCT and GHS GT for the 2008-2009 school year and compared to scores of the SWD population. As shown in Exhibit 7 below, GNETS students scored lower than the SWD population on these statewide assessments, in all subject areas.¹³



¹³ GNETS students are included in the Students with Disabilities (SWD) subgroup and therefore are included in all SWD data.

We also analyzed whether students met or exceeded state testing standards by Program. As shown in Exhibit 8, no Program had over 50% of students meeting or exceeding standards on their CRCT scores for the 2008-2009 school year. Overall, approximately 28% (2,502 of 8,840) of the GNETS students' CRCT scores met or exceeded standards. Additionally, for the same period, approximately 30% (170 of 565) of the GNETS student' GHSGT scores were proficient. Three Programs did not have a passing GHSGT score, in any subject area, during the 2008-2009 school year.

While GaDOE should continue its efforts to begin tracking the behavioral progress of students in the GNETS Program, steps should also be taken to develop and implement a method to allow GaDOE to track the academic progress of students while in the Program. Results could be used to assess the academic impact the Program is having on the students served. Steps should also be taken to increase the assessment results of GNETS students. The results from our analysis of GNETS student results could be used as a baseline for GaDOE to set performance measures in this area.

Exhibit 8		
2009 GNETS Program CRCT Results		
GNETS Program¹	CRCT Scores Meeting or Exceeding Standard / Total CRCT Scores	Percentage of CRCT Scores Meeting or Exceeding Standard
1	Alpine Program	131 / 311
2	Burwell Program	147 / 526
3	Cedarwood Program	100 / 357
4	Coastal Academy	71 / 337
5	Coastal Georgia Comprehensive Academy	76 / 364
6	DeKalb-Rockdale Program	110 / 502
7	Elam Alexander Academy	134 / 610
8	Flint Area Learning Program	26 / 128
9	GNETS of Oconee	60 / 240
10	H.A.V.E.N. Academy	131 / 438
11	Harrell Learning Center	80 / 258
12	Heartland Academy	101 / 327
13	Horizon Academy	117 / 367
14	Mainstay	101 / 458
15	North Metro Program	222 / 673
16	Northstar Educational and Therapeutic Services	100 / 311
17	Northwest Georgia Educational Program (NGEP)	186 / 601
18	Oaktree Program	206 / 420
19	Pathways Educational Program	57 / 283
20	River Quest Program	56 / 194
21	Rutland Academy	66 / 226
22	Sand Hills Program	110 / 423
23	South Metro Program	107 / 486
	Total	2,502 / 8,840
		28%

¹Woodall Program proficiency data was not included in rankings due to student FTE data being incomplete.

Source: GaDOE Testing Data

Agency Response: GaDOE agrees that the State should monitor the GNETS programs to ensure they are tracking the academic progress of GNETS students. Measuring the academic impact of the program for students in the GNETS program should be modeled similarly to other state calculations for measuring progress. The student data should be measured against the state targets in the State Performance Plan (SPP) and in the Annual Performance Report (APR), which is used for all students with disabilities in the state.

GaDOE noted that, during the course of the audit, it instituted a program level file for the 2009-2010 school year. The program level file is included in the State student record data collection. The data for these students can be disaggregated from the assessment file by GNETS program. This performance data can be compared to the academic performance targets in the SPP and in the APR, which is used for all students with disabilities in the state. The small numbers of students in a GNETS program could prohibit year to year statistically valid comparison; however, cohorts of student scores can be compared to State targets.

GaDOE does not collect sufficient data to determine whether the GNETS Program is cost-effective.

According to GaDOE the current goal of the GNETS Program is to *prevent children from requiring residential or other more restrictive placements by offering cost-effective comprehensive services in local areas*. Assessment of cost-effectiveness requires an ability to assess a cost per *successful* outcome in addition to the cost of inputs to the Programs. Currently, GaDOE lacks sufficient information, as discussed earlier, on outcomes. In addition, GaDOE lacks sufficient information on total program expenditures and a method for comparing GNETS costs to other placements is required. As discussed below, in order to assess cost-effectiveness of GNETS Programs, GaDOE needs complete information on expenditures, data on the number of students diverted from higher cost placements, and a method for assessing student outcomes from these placements.

- Total expenditures per student are not known because GaDOE does not require local expenditures to be reported by the GNETS Programs. According to fiscal year 2009 records, the annual cost (including only state and federal funds) per full-time equivalent GNETS student was approximately \$14,000. Given that our review found that students spent an average of four years in the GNETS Program once placed, the cost per student is approximately \$56,000. However, because the estimate does not account for local expenditures for the Program, it is underestimated. While all local school systems provide textbooks and transportation for their students, some local systems contribute significantly more. For example, some systems provide additional staff (e.g. teachers, nurses, paraprofessionals, and resource officers), construct new facilities, or provide rent-free facilities. Additionally, individual Programs have established innovative agreements, which provide additional services to students without additional costs to the state. For example, one GNETS Program we visited had an agreement with a local university to provide interns in therapeutic and educational capacities; another had cooperative agreements with local mental health providers; both arrangements serve to offset

program costs. It should be noted that these agreements with local school systems and other entities are informal in some areas and could change from year to year.

Variations in local contributions, as well as leveraging of other resources results in a significantly different amount expended per student from Program to Program. While this difference in expenditures may be expected due to differences in local input, more complete information is necessary to inform conclusions about outcomes. For example, a GNETS Program receiving substantial support may be producing significantly better outcomes; however, such a system may not be replicated in other areas without such inputs.

- GaDOE assesses cost-effectiveness by comparing GNETS costs to the costs of serving a student in a Psychiatric Residential Treatment Facility (PRTF), a more restrictive placement on the continuum. However, it is not realistic to expect that, if GNETS did not exist, all 5,000 students served each year would have to be institutionalized. Rather, it is possible that some students would be served in less restrictive, less expensive placements and a smaller percentage would require more expensive residential care (the cost of which would vary based on the length of the placement and the facility selected). In order to accurately assess whether GNETS Programs are cost-effective compared to these more restrictive and less restrictive placements requires knowing how many students were diverted from these placements to GNETS. GaDOE currently does not collect data on the number of students diverted.

There is an inherent cost to serve these students. In 2009, the state would have expended a minimum of \$42 million to serve these students in local schools rather than GNETS (compared to \$58 million in state funds for GNETS).¹⁴ While this scenario would cost approximately \$16 million less, it is not known what additional services – and at what costs – would have to be provided to meet the students' needs. In 2009, the state expended \$1.7 million to serve 26 students (19 of whom were in the facility for a full year) in PRTFs. While it is not known how many students would require residential treatment if not for the GNETS Program, it is reasonable to expect that some portion would. At current rates, if more than 5% of the current population were served in PRTF, the costs would be eroded.

To assess cost-effectiveness of these Programs, GaDOE should collect complete information on expenditures, collect data on the number of students diverted from other placements, and develop a method for assessing student outcomes from these placements. By requiring Programs to report all contributions, expenditures per student by GNETS Program could be calculated. GaDOE should also consider requiring that GNETS Programs develop written formal agreements with their participating school systems to detail what the systems are to provide to the GNETS Programs. In addition to facilitating financial reporting, such an agreement may ensure local systems do not reduce contributions if budget cuts deepen. Comparison

¹⁴ This cost is based on funding at the Category III Special Education formula level, which includes students with EBD (based on 2009 dollars). Calculation includes state funds and does not include the local match for education funds, the costs for teacher T&E (Training and Experience), or federal funds.

to other placements requires additional information on achievement of successful outcomes and an ability to compare inputs across Programs. Additionally, information on the percentage of the population at-risk of requiring more restrictive services would be necessary to determine how many students were successfully diverted into a less expensive GNETS placement.

Agency Response: GaDOE does not agree with this finding indicating that “The corrective action suggested by the auditors and their assumption that all GNETS students could be served in local schools is not realistic. Collecting data on the number of students diverted from other placements and developing a method for assessing student outcomes from these placements is not practical. The continuum of services provided by the GNETS program must be considered in calculating the cost effectiveness of the program. Local school district IEP teams have determined that the services provided by the GNETS programs cannot be provided by the local school districts. Consequently, it is erroneous to believe that local schools can serve all of the GNETS students as implied by the auditors. Last, the auditors recommend that the local school districts estimate the cost of the services for students served in the GNETS program that are not available in the local district. This would create a burden for the local school districts and provide little benefit to them or GaDOE.”

DOAA Response: The only corrective action recommended is that GaDOE compile complete information on expenditures and collect information on the number of students diverted from other placements in order to demonstrate that it is meeting its goal to “prevent children from requiring residential or other more restrictive placements by offering cost-effective comprehensive services in local areas.” The purpose of including the cost of a less restrictive placement in the finding was not to suggest that GNETS students should be placed there, but to indicate that an analysis of the cost effectiveness of GNETS should take into consideration the relative costs, services, and outcomes of other methods of instruction along to the continuum. Assertions that GNETS is cost effective because it is less expensive than a placement in a residential treatment facility fails to take into consideration the services, supports, and costs associated with other placements where GNETS students have been served or may be served in the future. As noted in the finding, assessment of cost effectiveness requires an ability to assess a program’s outcomes relative to its costs.

GaDOE needs to take steps to apply specific and measurable Program goals for the GNETS Program and hold Programs accountable for meeting those goals.

Currently, no performance measures have been established to allow GaDOE to determine if it is fulfilling its purpose of providing cost effective and comprehensive services to keep the student from entering higher cost residential treatment facilities, or its goal of returning students to their home school. We reviewed the rate of placement in hospitals or residential treatment facilities, reviewed the rate of return to home school and calculated the length of time students stayed in a GNETS Program. However, with no target established for the Program to meet, it is difficult to assess performance.

- We reviewed 502 student files from the 2004-2005 GNETS student cohort and found that 148 (29%) of the students had evidence of hospitalization or placement in a residential treatment facility. As of the 2008-2009 school year, the state was funding placements for 26 students at residential treatment facilities at an annual cost to the state of \$1.7 million. Total

expenditures by the local school systems was \$3,714,862 for these 26 students at residential treatment facilities and the state reimbursed \$1,658,859 of this amount. While, according to GaDOE personnel, local systems, mental health professionals, or parents may place children in these facilities as well, this list only includes students for whom GaDOE funds a portion of the cost of their placement.

- As shown in **Exhibit 9**, 43% (1,892 of 4,358) of the students in the 2004-2005 cohort had returned to their home school as of the latest information available. Of these, 32% (599 of 1,892) required an additional referral to the GNETS Program at least once. Eight students had four or more rereferrals to GNETS. The remaining 57% of students included 2,296 (53%) still in a GNETS Program and 170 (4%) in more restrictive placements as of their last known placement.

It should be noted that currently, GaDOE only requires GNETS Programs to report an annual list of students returning to their home school. However, this information only provides part of the information necessary to assess Program success. To identify students who are reentering the GNETS Program, GaDOE would have to compare student level information with information submitted by the Programs in previous years.

- The average length-of-stay for students in the 2004-2005 cohort is estimated to be four years. It should be noted that the data used for this analysis captures point-in-time data; therefore, students could have been sent back to their home schools between counts and returned to the GNETS Program prior to the next count. Additionally, given missing student counts in the data it is equally likely that students were in GNETS Programs during periods where students were not counted in school. The four-year average length-of-stay calculation does not reflect continuous placement in the GNETS Program, but an average of the total time students spent in GNETS over the date range of available data (1999-2009). Average length-of-stay calculation by GNETS Program varied, ranging from 1.9 to 4.5 years. See **Exhibit 9** on the next page for data by Program.

GaDOE has established 16 indicators in the State Performance Plan (See **Appendix F** for details) for the SWD population; however, these goals are not specific to the GNETS Program. Some examples of these indicators include graduation rate, dropout rate, and proficiency on the statewide assessments. Along with developing a more measurable purpose and goals for the Program, GaDOE should take steps to identify which of these indicators could help measure GNETS Program performance. Such a measurement would help assess overall performance as well as identify individual Programs that are not performing well in these areas. It may be possible to use these analyses as a baseline to measure Program performance in future years.

Exhibit 9					
2005 GNETS Student Return Rate and Length-of-Stay					
(N=4,358 students)					
	GNETS Program	GNETS Students Served in 2005	Students Returned to School by 2009		Average Length-of-Stay of Program Students in years¹
1	Alpine Program	142	91	64%	1.9
2	Burwell Program	283	99	35%	4.2
3	Cedarwood Program	154	55	36%	4.4
4	Coastal Academy	190	71	37%	4.0
5	Coastal Georgia Comprehensive Academy	180	48	27%	4.5
6	DeKalb-Rockdale Program	276	100	36%	4.2
7	Elam Alexander Academy	225	85	38%	3.9
8	Flint Area Learning Program	70	27	39%	4.4
9	GNETS of Oconee	87	53	61%	2.9
10	H.A.V.E.N. Academy	329	117	36%	3.9
11	Harrell Learning Center	89	35	39%	3.9
12	Heartland Academy	101	51	50%	3.3
13	Horizon Academy	152	90	59%	3.6
14	Mainstay	218	111	51%	3.3
15	North Metro Program	395	166	42%	3.5
16	Northstar Educational and Therapeutic Services	146	68	47%	3.2
17	Northwest Georgia Educational Program (NGEP)	338	144	43%	3.1
18	Oaktree Program	109	52	48%	3.4
19	Pathways Educational Program	170	88	52%	3.9
20	River Quest Program	96	42	44%	3.5
21	Rutland Academy	150	88	59%	2.8
22	Sand Hills Program	155	62	40%	3.6
23	South Metro Program	268	128	48%	4.3
24	N/A ²	35	21	60%	4.5
	TOTAL	4,358	1,892	43%	3.7

¹Length-of-Stay: students are counted for state funding purposes twice per year (in October and March). GNETS length-of-stay was calculated by using the average number of nonconsecutive student counts each program's students served in GNETS from 1999-2009 divided by 2 (for an annual total). Student Full-Time Equivalent (FTE) system data, used for this analysis, only captures point-in-time information (see **Appendix A**) and a student could have been sent back to his or her home school between counts and returned to the GNETS program prior to the next count. Because of this factor and because of missing counts, the length-of-stay is not necessarily a continuous uninterrupted placement but an average of the time spent in the program.

²The audit team did not assign a GNETS program to 35 students. Some of these students could not be tied to a specific GNETS program because GNETS personnel could not identify which program serves students from these schools. Additional students were tied to the Woodall GNETS whose data was found to be incomplete (see **Appendix A**); therefore, Woodall Program was not ranked separately. Both of these groups of students, however, are included in the totals calculation.

Source: GaDOE Full-Time Equivalent (FTE) Student Information System

Agency Response: GaDOE agrees that GNETS programs should be held accountable but disagrees that the programs are not accountable to GaDOE. GaDOE notes that it has held programs accountable by: setting targets for student performance in the State Performance Plan (SPP) and in the Annual Performance Report (APR); monitoring GNETS program's compliance with the Individuals with Disabilities Education Act (IDEA) and State Board of Education rules; requiring each GNETS program to annually submit a plan as part of the Georgia Continuous Improvement Monitoring Plan (GCIMP); conducting a Focused Monitoring visit of two GNETS programs each year; developing a corrective action plan (CAP) for compliance issues identified in the monitoring process; ensuring that the CAP is implemented; reviewing the IEPs of students served in the GNETS program as a part of local school district record reviews, and requiring each GNETS program to annually develop a safe schools plan.

DOAA Response: As noted in the finding, GaDOE needs to first identify goals (or targets) and set performance measures against those goals. After the goals have been identified and performance measures set, it can begin holding GNETS Programs accountable for meeting them. Additionally, the processes GaDOE refers to above relate to compliance with rules/law as opposed to program performance and achievement of program goals. Also noted in the finding, we recognize that GaDOE has established 16 indicators in the SPP; however, these measures are for the entire students with disabilities population and the goals are not specific to the GNETS Program. While GNETS student information is included in the students with disabilities population reporting, it was not disaggregated in a manner that would allow GaDOE to separately assess performance of individual GNETS Programs or GNETS students as a group at the time of our review.

GaDOE needs to place more emphasis on program management through the development of financial and operational requirements for Programs to follow.

GaDOE should develop consistent operational and financial requirements for Programs to follow and establish a process to ensure that funds are expended on activities for which they were allocated. By doing so, GaDOE could better ensure clinical staff positions are filled to support teachers at all GNETS Programs and ensure a minimum level of services are available across all Programs. It should be noted that the new data reporting system developed to gather information on GNETS students may help GaDOE manage the GNETS Program more effectively. These points are discussed in more detail in the following bullets.

- While GaDOE specifies positions (such as teachers, paraprofessionals, directors, psychologists, social workers, etc.) for the GNETS Programs through its funding formula, Programs are not currently held accountable for staffing to these requirements. GaDOE rules state *sufficient personnel to operate a GNETS program shall be employed...These shall include...therapeutic support staff*. According to fiscal year 2009 GNETS Program budget proposals, six of the 24 Programs had no psychologist, five had no social worker, and one Program had neither. Unlike a traditional school system, which is held accountable for providing the minimum level of services through mechanisms such as a requirement to meet Adequate Yearly Progress, GNETS Programs are not held accountable to GaDOE through such means.

While the formula provides \$50,336 for a GNETS director, we identified ten directors paid salaries of over \$100,000. Statewide, GNETS Programs were funded for 56 Psychologists and 112 Social Workers through the state grant; in fiscal year 2009, only 37 Psychologists and 72 Social Workers were staffed. As noted in an earlier finding, because information is not available to determine what, if any, funds are provided by the local school system, it is unclear whether the director's salary was increased as a result of cuts to the therapeutic services, or offset by funds received from the local system. However, the overall result is that GNETS Programs have fewer staffed positions, especially therapeutic staff.

- GaDOE does not currently require any specific therapeutic training for GNETS teachers nor do they require that specific evidence-based

therapeutic interventions be used. Individual GNETS Programs have elected to use various therapeutic interventions such as the Student Achievement Model (SAM), Developmental Therapy, and Life Space Crisis Intervention (LSCI); however there is no GaDOE requirement that all staff attend training on how these interventions should be appropriately administered. GaDOE does pay for teachers to receive physical restraint training but only if requested by the GNETS Program. Additionally, while the majority of Programs use SAM, which is based on certain therapeutic practices, it is not an evidence-based therapeutic model. Evidence-based models include consistent monitoring and recording of program effectiveness. The lack of required training and the variation in models used results in different services provided to different students across the state. GaDOE should consider establishing a minimum standard for the provision of services. As noted in a 1977 Attorney General's opinion on local school systems control over education, local control is *subject to minimum standards as may be established by the State Board of Education as a condition of continued financial assistance*.

Finally, the data reporting system that is being developed by GaDOE will include student-level information. This will allow GaDOE to analyze, for example, the number of students receiving mental health services (inside or outside the GNETS Program). Additional steps should be taken to enforce the funding formula requirements. Absent any other measures of accountability, the staffing models prescribed by the funding formula become one of the only methods for GADOE to determine whether therapeutic services are provided as part of the Program. GaDOE should also identify a basic level of training necessary for all GNETS staff in order to ensure a minimum level of service is available to all students served in the Program. While the specific model employed may vary from Program to Program, minimum requirements would help ensure basic needs are met.

Agency Response: GaDOE agrees that it should monitor the financial and operational requirements of the GNETS program by: providing guidance, monitoring financial and program operations to ensure compliance with rules and IDEA; requiring GNETS directors to participate in annual budgetary and financial training and submit budgets. To further increase accountability, GaDOE indicated that the following measures will be implemented in fiscal year 2011: an updated manual for budgetary procedures and risk management will be provided to GNETS programs (and local school districts); selected GNETS programs will participate in onsite fiscal audits; an updated GNETS program operations manual will be distributed; GNETS staff will be required to participate in training on the Georgia Performance Standards, IEP procedures, confidentiality, de-escalation and physical restraint training; and GNETS programs will have access to a regional "trainer" to provide training to staff in Life Space and Crisis Intervention (LSCI).

Action is currently being taken to implement a System of Care Plan that could facilitate collaboration across agencies serving children with severe emotional disturbances.

According to the state plan for the coordinated system of care for severely emotionally disturbed (SED) children (O.C.G.A 49-5-220) enacted in 1990, the Department of Human Resources (now the Department of Behavioral Health and Developmental Disabilities (DBHDD)) *shall have the primary responsibility for planning,*

The guiding principles for the system of care for SED youth include the provision of child - and family-centered, community-based, and comprehensive services.

Services and resources should be shared and coordinated amongst agencies and provided in the least restrictive setting close to the child's home.

developing, and implementing the coordinated system of care for severely emotionally disturbed children. It further states that DBHDD and GaDOE are to jointly develop and implement the plan. Subsequent to our fieldwork, DBHDD prepared a System of Care for SED Youth Strategic Plan (fiscal years 2010-2014). This plan is out for public comment as of September 2010. According to officials from GaDOE, they were involved in the development of this plan. The plan calls for collaboration across agencies (DBHDD, GaDOE, Department of Juvenile Justice (DJJ) and the Division of Family and Children Services (DFCS)) in the form of: braiding funding streams across agencies, developing state level interagency agreements regarding the provision of behavioral health services, and data sharing across agencies. Potentially, full collaboration could enable GaDOE to sign a state level agreement allowing DBHDD providers into the GNETS Program to provide therapeutic services at the GNETS facility.

Our review of 502 student files revealed that involvement with other child serving agencies is common for GNETS students. The 502 students in our sample were served at five GNETS Programs during the 2004-2005 school year. We found:

- 49% (224) had evidence in their files of receiving treatment from a mental health service provider (such as Community Service Boards (CSBs), one of the state mental health hospitals, a private psychiatric hospital or a residential treatment facility).
- 25% (123) had evidence in their files of involvement with DFCS.
- 37% (188) had evidence in their files of involvement with DJJ.

Interagency collaboration on the system of care for youth with SED could allow for more efficient and effective provision of services to GNETS students. The purpose of the GNETS Program is to prevent more expensive residential placement by providing cost effective and comprehensive services to students. Development and implementation of this system of care may help the GNETS Program achieve its purpose.

Appendix A

Objectives, Scope, and Methodology

Objectives:

This performance audit examined the effectiveness of the Georgia Network for Educational and Therapeutic Support (GNETS). We evaluated whether the GNETS is fulfilling its stated purpose of keeping students from higher cost residential placement and achieving its stated goal of returning students to their general education setting. Specifically, the audit sought to achieve the following objectives:

1. Determine if the GNETS program goals are appropriate and achievable.
2. Determine the extent to which GaDOE is being a good steward of state and federal funds appropriated to the GNETS.

Scope:

The audit focused on GNETS program activity from fiscal year 2005 through fiscal year 2009. The timeframe was selected because it would reasonably provide enough time for students to have had an outcome (graduation, withdrawal, etc.) with which to measure program performance. At the time of the data request, complete 2010 data was not available. Financial data for 2010 was available, and used as appropriate.

Methodologies:

We conducted this performance audit 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 our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Generally, the methodology included researching relevant state and federal law and Attorney General Opinions, interviews with GaDOE and GNETS personnel, as well as analysis of activity data, financial data, Full-Time Equivalent (FTE) Student Information System data, and testing data. We interviewed experts from the U.S. Department of Education's Office of Special Education Programs (OSEP) and experts in special education and school-based mental health, including representatives from other states and academic experts, and reviewed relevant studies and reports on this population. We also conducted site visits to eight of the 24 GNETS Programs and conducted file reviews at five of the sites visited.

Using Agency and Program documents, we identified GNETS goals and purposes. As discussed in the first finding and the fifth finding, we found that the Program does not have appropriate and achievable goals. As a result, we gathered data to determine what the actual outcomes of the Program have been, in terms of student outcomes and proficiency. In order to do so, we collected data from site visits, analyzed data from the state's FTE system, and analyzed testing data from the state's student record database.

We determined it would be necessary to assess the similarity of students (in terms of diagnosis and behaviors) between the GNETS in order to draw conclusions based on overall outcomes. Basically, if students in one part of the state appeared to have more complicated histories or more extreme disorder characteristics, it would be reasonable to expect that outcomes could be dramatically different between GNETS Programs. Information on students' diagnoses and behaviors is included in individual student files, housed on-site at the GNETS locations. We selected five sites based on: total students served, staffing levels

(including variations in therapeutic and instructional staff), area population, and region of the state (rural or metro). A total of 502 student records were reviewed while on site. We analyzed data on demographics, eligibility determination, diagnoses, behaviors, and other agency involvement and concluded that the population was similar across the state.

We also conducted a basic longitudinal study of GNETS students' placement and outcomes over time. The value of longitudinal studies for determining special education program effectiveness has been noted in academic studies of similar populations, in studies used by the U.S. Department of Education, and was suggested by the creator of the GNETS Program. Analysts were provided a master file of all fiscal year 2005-2009 GNETS student data from GaDOE (and all count information for these students from 1999-2009). Analysis focused on two different cohorts of this population:

- 2005-2009 school years: 10,170 unique students served by the Program. This population was broken down into subgroups for various analyses used throughout the report.
- 2005 school year: 4,358 unique students served by the Program; 1,457 unique high school students.

This data was analyzed to determine the outcomes of GNETS students, including but not limited to: graduation, dropout, return to home school, time spent in the Program, and diploma type. This information was also compared to similar statistics for SWD. It should be noted that GNETS students are a subgroup of SWD and therefore are included in all data reported for SWD.

We also analyzed statewide testing data. This consisted of data on individual students test scores on the Criterion Reference Competency Test (CRCT) and the Georgia High School Graduation Test (GHSGT). These scores were analyzed to determine the rate at which GNETS students met or exceeded expectations on the CRCT and were proficient on the GHSGT. Analysis also compared GNETS students' performance to SWD performance in all subject areas. The populations were:

- 2008-2009 CRCT Assessments: 8,840 CRCT Assessments by GNETS students (multiple subject areas).
- 2008-2009 GHSGT Assessments: 565 GHSGT Assessments by GNETS students.

The audit team also compared funding for GNETS placement to Special Education Category III. Students in GNETS are designated primarily under the disability category of EBD which is funded in local schools at a per-FTE rate under the Special Education Category III funding formula. Using fiscal year 2009 formula allotments for both the GNETS program and for Special Education Category III, analysts compared the total state dollars generated by the respective funding formulas for the budgeted number of GNETS students in fiscal year 2009 (5,657 FTEs). Analysts restricted the comparison to state dollars only; costs for teacher Training and Experience (T&E), local funds, and federal funds were not included or were removed from the resulting totals.

Assumptions:

Assigning Students to a GNETS Program

89% of students (9,072 of 10,170) attended a single GNETS Program throughout the range of the data. However, 1,098 students (11%) attended more than one GNETS. In these cases, students were assigned to the GNETS they attended most frequently.

It should be noted that 39 of the 10,170 (0.4%) GNETS students served in the metro-Atlanta area were reported from schools for which a GNETS could not be identified. In order to keep the students in the analyses, the students were assigned to the *No/So Metro* category.

Anomalies were also noted with data from one of the 24 GNETS Programs. The data reported by the Woodall Program did not match the data in the FTE system. Woodall's numbers of students were underreported because of coding errors by the home schools; this was discovered by comparing the FTE data to the Documentation of Service forms used by the GNETS Programs. While GaDOE personnel confirmed this problem and noted that it has since been corrected, Woodall was eliminated from the reported rankings.

Duplicate Graduates

Nine students were identified as having graduated but then returned to school in subsequent years. Due to the difficulty in determining whether the above nine students actually graduated or whether these are additional coding errors, these students were omitted from the final outcome analysis.

Length-of-Stay Calculation and Return Rate Calculation

Student FTE data only represents a snapshot of student enrollment activity, reflecting the student's placement on the two count days. GaDOE does not have data on where the student is placed between those periods. Therefore, it is possible that students in the sample may have left or entered a GNETS Program on other days during the school year, for which there is no record. At the time of our review, of the five GNETS Programs visited by the audit team, only the DeKalb-Rockdale Program kept a complete record of student length-of-stay; it does so because of its school status. None of the other GNETS Programs visited by the audit team, or GaDOE, track length-of-stay information for GNETS students. However, it is reasonable to use FTE information to estimate average length-of-stay because:

- IEPs (which result in GNETS placement) are commonly written for a one year service period at the beginning of the school year with reevaluation most often occurring between academic years.
- According to GNETS financial records, part-time students make up a very small portion of the GNETS population; most GNETS students are logged as full-time students by GNETS Programs in their budgets.

Appendix B Other States

During interviews with six experts in the field of special education and/or school-based mental health, we solicited information regarding other state programs successfully serving this population. We identified five states for review. We attempted to obtain data regarding outcomes and details regarding method of delivery. This information was not available from all states; no state had outcome data specific to this population. Additionally, we did not identify another state delivery services in the same way Georgia does. The results of our review and interviews with state personnel are discussed below.

Kentucky: School systems in Kentucky may place students with non-severe emotional disturbance, along with other behaviorally challenged non-disabled students, in alternative programs. Schools are not encouraged to send students with the most severe EBD cases to alternative schools. These students may be served in residential facilities, day treatment, or EBD self-contained classrooms. Alternative schools report the students' test scores back to the home school. It is not clear if this network of alternative programs is available statewide or only in certain local school systems. Kentucky does have a program to serve EBD students known as the IMPACT Program. See the bullet below.

- The Interagency Mobilization for Progress in Adolescent and Child Treatment (IMPACT) program, a mental health administered and funded collaborative between education, juvenile justice, mental health, and social services, provides mental health and academic services to students needing additional support on a case-by-case basis wherever the student may be (home school, residential, hospitalized, etc.). Students are typically referred by their home school. Even after the student leaves the home school, IMPACT continues to serve him or her. It also has its own line item in the budget from the legislature because it is an interagency operation. There are regional and state level interagency councils. The regional councils meet monthly to coordinate services for its youth. If a case cannot be solved regionally, it is bumped to the state level council. The program has contracted with outside researchers to collect data (e.g. pre- and post-testing).

Maryland: There is no statewide educational network of programs specifically for students with EBD. Of the state's 24 school systems, only five are large enough to create their own special schools or self-contained classes for students with emotional disturbances. The remaining systems pay private residential service providers if students require services they cannot provide. However, in Maryland regional education/mental health collaboratives have been created to provide comprehensive services in clinical, academic, and home settings:

- The Kennedy Krieger Institute is a non-profit research institute, in partnership with the Baltimore Public School System (BPSS), that provides educational services in school-based and hospital-based settings for students with severe emotional and behavioral disorders and other disabilities. Students in the clinical programs are provided academic instruction by BPSS teachers while receiving clinical treatment.
- The Prince George's County School Mental Health Initiative (PGCMHI) is a partnership between the Prince George's County School District, the Maryland State Department of Education, and the University of Maryland Center for School Mental Health. PGCMHI provides services for students at-risk of entering non-public

school settings (such as residential programs). A team of clinical and school psychologists work with the student's teachers and family members, providing case management, telemedicine, social services, and family advocacy while the student remains in their home school. The PGCMHI also supports the use of, and trains school faculty and parents on, evidence-based practices. Results of the initiative found that students receiving these services were less likely to be placed in non-public programs, had higher attendance and lower suspension rates, and the school system realized a cost savings as a result of avoiding residential placements.

North Carolina: There is no statewide educational network of programs specifically for students with EBD. These students are provided with homebound instruction, although some larger school systems have created separate schools and self-contained programs via local cooperative agreements. Residential services may also be provided through private providers at the school system's expense. Program personnel noted that IEP teams do not usually recommend residential placement but rather The North Carolina Division of Mental Health, Developmental Disabilities, and Substance Abuse Services (DMHDDAS) is responsible for any and all behavioral services for students.

Pennsylvania: Services for students with EBD are primarily provided in the school through the use of pullout classes and resource rooms. For students with severe behaviors the local school systems may contract with state-approved private residential providers; the cost is shared between the local system (40%) and the Pennsylvania Department of Education (PDE) (60%). In some areas, multiple school systems have partnered and contracted with local Intermediate Units (IUs), similar to Georgia RESAs, to provide self-contained in-school or separate facilities for EBD students too severe to be educated in their regular school. The school systems provide the facilities and infrastructure while the IU employs and manages all personnel. However, these types of contracted arrangements are not in existence statewide.

Tennessee: There is no statewide educational network of programs specifically for students with EBD. In most cases, students are served by their home schools. Severely disturbed students may be served by private providers or schools, by wilderness programs, or by residential state programs.

Appendix C GNETS Programs					
GNETS Program	GNETS location	Fiscal Agent	School Systems Served	2009 GNETS Students ¹	
1	Alpine Program	Gainesville	Pioneer RESA	Banks, Dawson, Franklin, Forsyth, Habersham, Hall, Hart, Lumpkin, Rabun, Stephens, Towns, Union, White, Gainesville City	183
2	Burwell Program	Carrollton	West Georgia RESA	Carroll, Coweta, Heard, Meriwether, Troup, Carrollton City	273
3	Cedarwood Program	Baxley	First District RESA	Appling, Bulloch, Candler, Evans, Jeff Davis, Tattnall, Toombs, Wayne, Vidalia City	174
4	Coastal Academy	Brunswick	First District RESA	Bryan, Camden, Glynn, Liberty, Long, McIntosh	221
5	Coastal Georgia Comprehensive Academy	Savannah	Chatham County Schools	Chatham, Effingham	215
6	DeKalb-Rockdale Program	Lithonia	DeKalb County Schools	DeKalb, Rockdale, Decatur City	324
7	Elam Alexander Academy	Macon	Bibb County Schools	Bibb, Crawford, Houston, Jones, Monroe, Peach, Twiggs	369
8	Flint Area Learning Program	Cordele	Crisp County Schools	Crisp, Dooly, Macon, Marion, Schley, Sumter, Taylor, Webster	98
9	GNETS of Oconee	Milledgeville	Oconee RESA	Baldwin, Hancock, Jasper, Johnson, Putnam, Washington, Wilkinson	116
10	H.A.V.E.N. Academy	Smyrna	Cobb County Schools	Cobb, Douglas, Marietta City	368
11	Harrell Learning Center	Waycross	Okefenokee RESA	Atkinson, Bacon, Brantley, Charlton, Clinch, Coffee, Pierce, Ware	119
12	Heartland Academy	Mt. Vernon	Heart of Georgia RESA	Bleckley, Dodge, Laurens, Montgomery, Pulaski, Telfair, Treutlen, Wheeler, Wilcox, Dublin City	151
13	Horizon Academy	Valdosta	Lowndes County Schools	Ben Hill, Berrien, Brooks, Cook, Echols, Irwin, Lanier, Lowndes, Tift, Turner, Valdosta City	186
14	Mainstay	Griffin	Griffin-Spalding County Schools	Butts, Fayette, Henry, Lamar, Newton, Pike, Spalding, Upson	269
15	North Metro Program ²	Atlanta	Metro RESA	North Fulton, Gwinnett, Buford City, Atlanta Public Schools (North)	497
16	Northstar Educational and Therapeutic Services	Canton	North Georgia RESA	Cherokee, Fannin, Gilmer, Murray, Pickens, Whitfield, Dalton City	204
17	Northwest Georgia Educational Program (NGEP)	Rome	Northwest Georgia RESA	Bartow, Catoosa, Chattooga, Dade, Floyd, Gordon, Haralson, Paulding, Polk, Walker, Cartersville City, Trion City, Rome City, Calhoun City, Bremen City, Chickamauga City	348
18	Oaktree Program	Albany	Dougherty County Schools	Baker, Calhoun, Dougherty, Early, Lee, Miller, Terrell, Worth	176
19	Pathways Educational Program	Thomasville	Thomas County Schools	Colquitt, Decatur, Grady, Mitchell, Seminole, Thomas, Pelham City, Thomasville City	194
20	River Quest Program	Midville	Central Savannah River Area RESA	Burke, Emanuel, Glascock, Jefferson, Jenkins, Screven	112
21	Rutland Academy	Athens	Northeast Georgia RESA	Barrow, Clarke, Elbert, Greene, Jackson, Madison, Morgan, Oconee, Oglethorpe, Walton, Commerce City, Jefferson City, Social Circle City	221
22	Sand Hills Program	Augusta	Richmond County Schools	Columbia, Lincoln, McDuffie, Richmond, Taliaferro, Warren, Wilkes	191
23	South Metro Program ²	Forest Park	Clayton County Schools	South Fulton, Clayton, Atlanta Public Schools (South)	389
24	Woodall Program	Columbus	Muscogee County Schools	Chattahoochee, Clay, Harris, Muscogee, Quitman, Randolph, Stewart, Talbot	73
¹ Students served based on program-reported student counts for full-time and part-time students for fiscal year 2009.				5,471	
² North Metro and South Metro GNETS split services to Atlanta Public Schools and Fulton County Schools.					

Source: Georgia Department of Education

Appendix D GNETS Program Budgets Fiscal Year 2005-2010 (State and Federal Funds ¹)											
GNETS Program		Fiscal Agent									Total 2005-2010
		2005	2006	2007	2008	2009	2010				
1	Alpine Program	Pioneer RESA	\$2,301,752	\$2,433,091	\$2,453,842	\$2,356,282	\$2,394,471	\$2,265,647	\$14,205,085		
2	Burwell Program	West Georgia RESA	\$3,564,793	\$3,914,642	\$4,371,455	\$4,089,709	\$4,098,915	\$3,857,574	\$23,897,088		
3	Cedarwood Program	First District RESA	\$2,066,092	\$2,256,982	\$2,367,768	\$2,369,773	\$2,312,289	\$2,233,513	\$13,606,417		
4	Coastal Academy	First District RESA	\$2,564,410	\$2,938,974	\$3,112,789	\$3,086,935	\$3,026,634	\$2,769,231	\$17,498,973		
5	Coastal Georgia Comprehensive Academy	Chatham County Schools	\$2,608,129	\$2,923,280	\$3,140,380	\$3,247,764	\$3,271,949	\$3,053,464	\$18,244,966		
6	DeKalb-Rockdale Program	DeKalb County Schools	\$3,707,961	\$3,878,245	\$3,747,554	\$3,852,066	\$3,833,891	\$3,979,254	\$22,998,971		
7	Elam Alexander Academy	Bibb County Schools	\$3,625,411	\$4,441,062	\$4,622,483	\$4,774,963	\$4,523,465	\$4,343,706	\$26,331,090		
8	Flint Area Learning Program	Crisp County Schools	\$1,242,583	\$1,394,673	\$1,419,625	\$1,474,605	\$1,435,998	\$1,323,605	\$8,291,089		
9	GNETS of Oconee	Oconee RESA	\$1,303,211	\$1,408,120	\$1,464,780	\$1,526,689	\$1,425,954	\$1,410,920	\$8,539,674		
10	H.A.V.E.N. Academy	Cobb County Schools	\$4,914,091	\$5,207,681	\$5,324,179	\$5,590,313	\$5,724,101	\$5,614,908	\$32,375,273		
11	Harrell Learning Center	Okfenokee RESA	\$1,438,828	\$1,544,419	\$1,652,296	\$1,597,584	\$1,566,630	\$1,514,974	\$9,314,731		
12	Heartland Academy	Heart of Georgia RESA	\$1,450,750	\$1,790,085	\$1,980,797	\$2,099,376	\$2,041,277	\$1,933,486	\$11,295,771		
13	Horizon Academy	Lowndes County Schools	\$2,371,717	\$2,558,792	\$2,577,295	\$2,430,073	\$2,416,515	\$2,308,216	\$14,662,608		
14	Mainstay	Griffin Spalding County Schools	\$3,120,933	\$3,620,745	\$3,753,454	\$3,908,234	\$3,743,186	\$3,559,916	\$21,706,468		
15	North Metro Program	Metro RESA	\$5,397,047	\$5,447,181	\$6,726,696	\$6,818,790	\$6,824,446	\$6,291,554	\$37,505,714		
16	Northstar Educational and Therapeutic Services	North Georgia RESA	\$2,444,258	\$2,715,345	\$2,683,225	\$3,062,619	\$3,137,455	\$2,813,876	\$16,856,778		
17	Northwest Georgia Educational Program (NGEP)	Northwest Georgia RESA	\$4,186,262	\$4,452,741	\$4,207,988	\$4,500,320	\$4,408,090	\$4,241,914	\$25,997,315		
18	Oaktree Program	Dougherty County Schools	\$2,328,901	\$2,525,610	\$2,800,108	\$2,941,489	\$2,920,817	\$2,732,660	\$16,249,585		
19	Pathways Educational Program	Thomas County Schools	\$2,134,323	\$2,725,282	\$2,910,360	\$2,791,789	\$2,804,173	\$2,654,657	\$16,020,584		
20	River Quest Program	Central Savannah River Area RESA	\$1,559,282	\$1,615,628	\$1,552,551	\$1,651,601	\$1,544,542	\$1,484,102	\$9,407,706		
21	Rutland Academy	Northeast Georgia RESA	\$2,593,989	\$2,627,378	\$2,918,454	\$3,021,667	\$2,867,043	\$2,591,530	\$16,620,061		
22	Sand Hills Program	Richmond County Schools	\$2,330,331	\$2,656,764	\$2,494,609	\$2,725,795	\$2,645,653	\$2,478,190	\$15,331,342		
23	South Metro Program	Clayton County Schools	\$5,067,777	\$5,522,993	\$5,398,368	\$5,386,151	\$5,338,523	\$5,016,074	\$31,729,886		
24	Woodall Program	Muscogee County Schools	\$1,889,499	\$1,809,081	\$1,877,522	\$1,735,572	\$1,669,612	\$1,587,552	\$10,568,838		
	Totals		\$66,212,330	\$72,408,794	\$75,558,578	\$77,040,159	\$75,975,629	\$72,060,523	\$439,256,013		

¹Funds include both state and federal amounts. Federal funds from discretionary amount provided to GaDOE as part of state IDEA federal special education grant. \$46,848,286 (11%) of the \$439,256,013 six-year total of GNETS Program Budgets was federal funds. The remaining \$392,407,727 (89%) were state funds.

Source: Georgia Department of Education

Appendix E Relative Performance of GNETS Programs Based on 2005 GNETS Student Outcomes

GNETS Program	LRE ¹ (N=4,358)	LENGTH-OF-STAY ² (N=4,358)	TRANSFERS ³ (N=1,457)	DROPOUTS (N=1,457)	DROPOUTS + TRANSFERS ⁴ (N=1,457)	REGULAR GRADUATES ⁵ (N=1,457)	OTHER COMPLETERS ⁶ (N=1,457)
1 Alpine Program	64%	1.9	13%	59%	72%	0%	9%
2 Bunwell Program	35%	4.2	16%	21%	37%	12%	29%
3 Cedarwood Program	36%	4.4	17%	17%	35%	9%	43%
4 Coastal Academy	37%	4.0	9%	36%	45%	8%	21%
5 Coastal Georgia Comprehensive Academy	27%	4.5	25%	8%	33%	10%	26%
6 DeKalb-Rockdale Program	36%	4.2	18%	22%	40%	10%	34%
7 Elam Alexander Academy	38%	3.9	25%	11%	36%	11%	30%
8 Flint Area Learning Program	39%	4.4	12%	28%	40%	4%	40%
9 GNETS of Oconee	61%	2.9	16%	48%	64%	0%	28%
10 H.A.V.E.N. Academy	36%	3.9	12%	24%	36%	9%	24%
11 Harrell Learning Center	39%	3.9	11%	22%	33%	17%	22%
12 Heartland Academy	50%	3.3	5%	48%	52%	5%	29%
13 Horizon Academy	59%	3.6	8%	31%	38%	12%	31%
14 Mainslay	51%	3.3	19%	21%	40%	8%	33%
15 North Metro Program	42%	3.5	24%	15%	39%	12%	27%
16 Northstar Educational and Therapeutic Services	47%	3.2	8%	27%	35%	14%	33%
17 Northwest Georgia Educational Program (NGEP)	43%	3.1	13%	29%	42%	19%	25%
18 Oaktree Program	48%	3.4	8%	30%	38%	20%	33%
19 Pathways Educational Program	52%	3.9	16%	36%	51%	4%	31%
20 River Quest Program	44%	3.5	19%	27%	46%	3%	46%
21 Rutland Academy	59%	2.8	40%	18%	58%	2%	22%
22 Sand Hills Program	40%	3.6	12%	14%	26%	7%	40%
23 South Metro Program	48%	4.3	20%	9%	28%	5%	38%
24 NA ⁷	63%	4.5	17%	25%	42%	0%	25%
TOTAL	43%	3.7	17%	23%	40%	10%	30%

Results based on analyses of GaDOE FTE data on 4,358 students in GNETS programs in 2005 (1,457 of those students were in grades 9-12). Data was provided on the sample for academic years 1999 - 2009. Outcomes reported as of end of 2009 academic year. An additional 301 students had other outcomes (transfers out of state, court orders, deaths, etc.) or were still in school.

Red Highlights = poor relative performance. **Green** Highlights = good relative performance

¹LRE: Least Restrictive Environment (LRE) is a measure of the percentage of 2005 GNETS program students returned to a general education environment by the end of the 2008-2009 school year.

²Length-of-Stay in years: Georgia students are counted twice per academic year for school funding purposes (in October and March).

³Transfers: students who withdrew from school under the withdrawal code of "Transferred to another public school system in Georgia".

⁴Dropouts + Transfers: 98% of GNETS sample students listed under the withdrawal code "Transferred to another public school system in Georgia" failed to reenter another Georgia school. Analysis combines the two categories.

⁵Regular Graduates: students who graduated with regular diplomas (College Prep Diploma, Vocational Diploma, or Dual Diploma (College and Vocational)). Only students who receive regular diplomas are counted as graduates in the state's graduation rate calculations.

⁶Other Completers: students who left school with Special Education Diplomas or Certificates of Achievement.

⁷The audit team did not assign a GNETS program to 35 students. Some of these students could not be tied to a specific GNETS program because GNETS personnel could not identify which program serves students from these schools. Additional students were tied to the Woodall GNETS whose data was found to be incomplete (see **Appendix A**); therefore, Woodall Program was not ranked separately. Both of these groups of students, however, are included in the totals calculation.

Source: GaDOE Full-Time Equivalent (FTE) Student Information System

Appendix F	
Goals and Indicators in the State Performance Plan for Students with Disabilities	
Goal/Indicator	2010 Target
Goal One: Improve post-school outcomes for SWD	
Decrease the percentage of SWD w ho drop out of school	5.30%
Increase the percentage of SWD w ho earn a regular high school diploma	42%
Increase the percentage of SWD w ho transition to employment or post-secondary education	60%
Increase the percentage of transition-aged SWD w ho have coordinated and measurable IEP goals and transition services that w ill lead to attainment of post-secondary goals	100%
Goal Two: Improve services for young children (3-5 years) with disabilities	
Increase the percentage of young children either referred by parents or other agencies prior to age three w ho are determined eligible and have an IEP implemented by the third birthday	100%
Increase the percentage of time young children w ith disabilities spend in natural environments w ith typically developing peers	69.53%
Increase the percentage of young children w ith disabilities w ho show improved positive social/emotional skills, acquisition and use of know ledge and skills, and use of appropriate behavior	N/A
Goal Three: Improve the provision of a free & appropriate education to SWD	
Increase percentage of students w ho are evaluated and determined eligible for special education w ithin 60 days	100%
Increase the percentage of SWD w ho receive instruction in the general education setting w ith appropriate supports and accommodations	65%
Increase the performance of SWD on statew ide assessments. (Reading/Math)	70% / 59.77%
Decrease the percentage of SWD w ho are removed from their school for disciplinary reasons	3.28%
Decrease the disproportionate representation of SWD due to inappropriate policies	0%
Increase the percentage of parents w ho report the schools encouraged parent involvement for improved results for SWD	40%
Goal Four: Improve compliance with state and federal laws and regulations	
Correct all noncompliance as soon as possible but no later than one year from identification	100%
Follow dispute resolution procedures and requirements w ithin any applicable timelines	100%
Submit reports in a timely manner	100%
Source: GaDOE State Performance Plan for Students w ith Disabilities	

For additional information or for copies of this report call 404-657-5220 or see our website:
<http://www.audits.state.ga.gov/rsaAudits>