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Dr. Richard L. Torgerson
President
Luther College
700 College Drive
Decorah, Iowa 52101

MAR 28 2003

Dear Dr. Torgerson:

This is our Final Audit Report presenting the results of our Audit of the Talent Search Program at Luther College. The objective of our audit was to determine if Luther College administered the Talent Search program in accordance with the law (Higher Education Act of 1965, Section 402B) and specific Talent Search regulations governing the documentation of participant eligibility. Luther College officials did not concur with our finding or recommendations in their January 20, 2003, response to our draft report. We have summarized the comments after the finding and recommendations and the full response is provided as an attachment to this letter.

AUDIT RESULTS

We found that Luther College did not always administer its Federal Talent Search grant in accordance with applicable law and regulations. For the grant period September 1, 2001, through August 31, 2002, we estimate that Luther College served only 363 of the 625 participants it was funded to serve, which is significantly less than the 600 participants required of Talent Search grantees. Therefore, by not meeting the required minimum number of participants, the Luther College Talent Search project is ineligible and all \$219,567 of grant expenditures for the budget period were unallowable.

Requirements for Talent Search Grantees and Regulatory Definitions

For the 2001–2002 budget period, Luther College and the U.S. Department of Education (Department) agreed that the grant was to serve 625 participants (the target population). This was more than the minimum 600 participants required to be served per the Talent Search regulations in 34 C.F.R. § 643.32 (b).

Participants must meet two conditions according to 34 C.F.R. § 643.7

- (b) *Other definitions . . . Participant* means an individual who—
- (1) Is determined to be eligible to participate in the project . . .; and
 - (2) Receives project services designed for his or her age or grade level.

Department Talent Search program officials stated that they do not consider mailings as an eligible service to participants of Talent Search programs to satisfy requirement (2) above. Department officials also offered examples of adequate documentation to support services provided, such as sign in sheets and needs assessments. The regulation at 34 C.F.R. § 643.32 (c)(3) requires grantees to maintain documentation to support the services rendered.

Some Talent Search Participants Claimed Did Not Receive an Eligible Service

We selected a random sample of 200 names from a list provided by Luther College of 610 Talent Search participants claimed for the 2001-2002 budget period. We reviewed the files of all 200 participants selected and found that, although eligibility was documented for all 200, only 119 met the second part of the participant definition of receiving an eligible service during the budget period. The Talent Search director or a Talent Search advisor confirmed that, of the 81 participants lacking evidence of an eligible service:

- 68 participants received mailings (newsletter) only (an ineligible service); and
- 13 files did not contain any documentation to support receipt of an eligible service.¹

Based on our statistical sample, we estimate that Luther College only served 363 eligible participants during the 2001-2002 budget period.²

Since its beginning in August 1998, the Talent Search program at Luther College has had three program directors. The newness of the program and personnel turnover may have contributed to the College's difficulties in meeting its Talent Search target number. Luther College's Talent Search Director suggested that it would be helpful if the Department had more training information such as standard forms, a data library for new directors to reference, and published best practices.

¹ Although a service may have been noted in the computerized student management database, system errors made the service noted in the database unreliable. For example, we observed instances where a service recorded in the database pre-dated the participant's enrollment date.

² We are 90% confident that the participants receiving eligible services total 363 +/- 8.71 percent.

The 363 participants are significantly below both the 625 participant target population for which Luther College was funded and less than two thirds of the required 600 minimum participants of a Talent Search grantee. Therefore, Luther College was not in compliance with regulatory requirements for the period September 1, 2001, through August 31, 2002, and all \$219,567³ expended for that budget period was unallowable.

Recommendations:

We recommend that the Assistant Secretary for Postsecondary Education require

1. Luther College to:

- 1.1 Refund the entire \$219,567 expended during its Talent Search program for the 2001-2002 budget period.
- 1.2 Establish procedures to ensure that only those participants receiving eligible services are counted as Talent Search participants and that those services are properly documented.

2. The Department's Director of Federal TRIO Programs to:

- 2.1 Perform ongoing monitoring of the current Luther College Talent Search project to determine whether the College will be able to meet required minimum participant numbers or should have its grant withdrawn.
- 2.2 Review Luther College's three prior budget periods (1998, 1999 and 2000) to verify that the participant numbers were met in each budget period and take appropriate action.

Auditee Response

Luther College did not concur that mailings (newsletters) are an ineligible service or that the Blumen database entries were not sufficient documentation of services. The college claimed that the language in the Talent Search regulations and Departmental guidance does not exclude newsletters from eligible services and that the newsletters provide both "academic advising" and "counseling" services. The college also noted that "in very, very few cases" was the newsletter the only contact with students during their involvement with the program. The response also stated that the Blumen database meets and exceeds the requirements for documenting services and that any problems were remedied prior to completing their participant count. Even though

³ The expended amount for the 2001-2002 year is the sum of the award amount of \$212,428, plus the carryover amount of \$7,139, from previous award years.

the College disagreed with our finding and recommendations, they reported taking corrective actions to increase personal contact with program participants and to maintain supporting documentation on services provided outside of the electronic system of records.

OIG Response

Newsletters: An individual may receive a mailing, however, there is no assurance that the claimed participant has received a service. Our audit report concluded that if Luther College provided no other services to participants but the mailings of newsletters, the sending of those newsletters did not constitute participant receipt of an eligible project service. We believe the definition of participant at 34 C.F.R. § 643.7 (b) (2) “*Receives* (emphasis added) project services designed for his or her age or grade level.” describes the intent of the Talent Search program regarding service to participants. A mailing may inform an individual about a service, but unless the recipient of the mailing avails her/himself of the service, she/he has not received the service. Mailing a newsletter does not ensure that the addressee will read it or, for that matter, even receive it.

We also believe that, although newsletters may contain some of the information that might be shared in an “academic advising” or “career counseling” activity as the College claims, both advising and counseling imply a personal communication between the provider and recipient of a service. Both activities also generally mean that the participant is provided individualized information and services based on the student’s questions or circumstances. A newsletter, by its nature, provides information for the general population instead of the personal assistance provided in an advising or counseling session.

Furthermore, based on discussions with program officials, the Department of Education does not consider newsletters as project services.

Blumen database: The issue is not whether the database itself is reliable, but that the information contained in the database could be relied on. As stated elsewhere in the report, we conducted routine testing of the system for data reliability. As noted in footnote 1, we found instances where a service was posted prior to the participant’s acceptance into the program. In addition, we discovered instances when a staff member batched an activity and it posted to all participants’ accounts listed in the system. There was no way for us to know whether the service was received or if it was entered in error. Based on these observations, as well as statements made by Luther College Talent Search staff, we determined that the information contained in the system was unreliable. Finally, 2 of the 13 individuals lacking documentation did not have any service after enrollment in the program recorded in the database at all.

In its response, Luther College did not provide any additional documentation for consideration to support project services to the 81 participants determined to be ineligible. Therefore, Luther College was not in compliance with Department of Education legislation and regulations during the period of review.

BACKGROUND

Luther College is located in Decorah, Iowa. It is an independent, coeducational, residential, undergraduate liberal arts college affiliated with the Evangelical Lutheran Church in America. The Norwegian Evangelical Lutheran Church founded the college in 1861. The student enrollment at Luther College is approximately 2,600.

Luther College was awarded a four-year Talent Search grant covering the performance period September 1, 1998, through August 31, 2002 (P044A980394). The College participates in other TRIO programs, but this was its first Talent Search grant. For the 2001-2002 budget period, Luther College was awarded \$212,428 to provide services to 625 participants and a \$10,000 supplemental technology grant awarded to all Talent Search projects. The Talent Search project administered by the college targeted 17 school districts within a 50-mile radius of the college. The 17 school districts lie within the rural counties of northeast Iowa and southeast Minnesota.

Title IV of the Higher Education Act of 1965, as amended (20 U.S.C. 1070a-11 and 12), authorizes the Talent Search program, one of the U. S. Department of Education's TRIO programs. The Talent Search program is governed by the regulations codified in Title 34 C.F.R. 643. All regulatory citations in the report are to the codification in effect as of July 1, 2001.

The Talent Search program provides grants to projects designed to (1) identify qualified youths with potential for education at the postsecondary level and encourages them to complete secondary school and undertake a program of postsecondary education; (2) publicize the availability of student financial assistance for persons who seek to pursue postsecondary education; and (3) encourage persons who have not completed education programs at the secondary level, but who have the ability to do so to reenter these programs. 34 C.F.R. § 643.1.

AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of our audit was to determine if Luther College administered the Talent Search program in accordance with the law and specific Talent Search regulations governing the documentation of participant eligibility. Specifically, we sought to determine whether participants met the twofold requirements of (1) eligibility and (2) receipt of eligible services during the budget period.

To accomplish our objective, we

- reviewed applicable Federal law and regulations,
- reviewed files relating to the Talent Search project at Luther College and at the Department's TRIO program office located in Washington, D.C.,
- interviewed Luther College and Department of Education personnel,
- determined whether the TRIO cluster had been audited by the College's Certified Public Accountants,
- obtained and analyzed documents related to the Talent Search project at Luther College, e.g. organization chart, College policies and procedures, and
- randomly selected 200 Talent Search participant files from a universe of 610⁴ to test participant eligibility and documentation of eligible service. All student files selected in the sample were reviewed.

We relied upon the data contained in the Talent Search computerized student management software (Blumen) for establishing the Talent Search population from which we drew our sample. However, we did not rely upon the Blumen software for documenting services received. We evaluated the relevant general and application controls, and tested the data for accuracy and completeness by comparing source records to computer data and comparing computer data to source records. Based on these assessments and tests, we concluded that the participant listing was sufficiently complete, however, system errors resulted in services being posted to individuals who had not participated in the activity. Therefore, we concluded the population data were sufficiently reliable to be used for a sample population, however services data could not be used in meeting the audit's objective. An extract of payment and award data from the Department's Grants and Payments System (GAPS) was used to corroborate information obtained from the College's accounting system. We found that the College's accounting data was sufficiently reliable for our audit purposes.

The audit covered the 2001-2002 grant budget period (September 1, 2001, through August 31, 2002). We visited the Department's TRIO program offices located in Washington D.C. from July 31, 2002, to August 2, 2002. Fieldwork was conducted at Luther College from September 9, 2002, to September 13, 2002, and we held an exit conference with officials of Luther College on September 13, 2002. Our audit was conducted in accordance with generally accepted government auditing standards appropriate to the scope of review described above.

⁴ We were provided a list of 613 individuals; however, college officials stated that three of the participants listed had received no service during the period and were removed from the sample universe.

STATEMENT ON MANAGEMENT CONTROLS

As part of our review we assessed the system of management controls, policies, procedures, and practices applicable to Luther College's administration of the Talent Search program. Our assessment was performed to determine the level of control risk for determining the nature, extent, and timing of our substantive tests to accomplish the audit objective.

For the purpose of this report, we assessed and classified the significant controls into the following categories:

- Services provided to participants
- Participant eligibility
- Program record maintenance

Because of inherent limitations, a study and evaluation made for the limited purpose described above would not necessarily disclose all material weaknesses in the management controls. However, our assessment disclosed management control weaknesses, which adversely affected Luther College's ability to administer the Talent Search program. These weaknesses included noncompliance with Federal regulations related to participant services resulting in participant ineligibility and deficient record maintenance procedures. These weaknesses and their effects are fully discussed in the *AUDIT RESULTS* section of this report.

ADMINISTRATIVE MATTERS

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report represent the opinions of the Office of Inspector General. Determination of corrective action to be taken will be made by the appropriate Department of Education officials.

If you have any additional comments or information that you believe may have a bearing on the resolution of this audit, you should send them directly to the following Education Department official, who will consider them before taking final Departmental action on the audit:

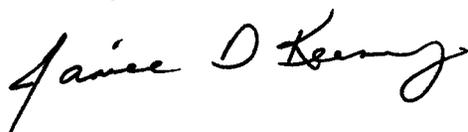
Sally Stroup, Assistant Secretary
Office of Postsecondary Education
U.S. Department of Education
1990 K Street, NW
Washington, DC 20006

Office of Management and Budget Circular A-50 directs Federal agencies to expedite the resolution of audits by initiating timely action on the findings and recommendations contained therein. Therefore, receipt of your comments within 30 days would be greatly appreciated.

In accordance with the Freedom of Information Act (5 U.S.C. §552), reports issued to the Department's grantees and contractors are made available, if requested, to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.

If you have any questions, please contact me at 816-268-0500.

Sincerely,



for

William Allen
Regional Inspector General for Audit

Attachment

cc:

Sally Stroup, Assistant Secretary, Office of Postsecondary Education

Electronic cc:

- Jay Noell, Audit Liaison Officer
- Harold Jenkins, Office of General Counsel
- William D. Hansen, Deputy Secretary
- John Danielson, Chief of Staff
- Eugene Hickok, Under Secretary
- John Gibbons, Director, Communications
- Jack Martin, Chief Financial Officer
- Clay Boothby, Acting AS, Legislation and Congressional Affairs
- Laurie M. Rich, AS, Intergovernmental and Interagency Affairs
- Carolyn Adams, OGC (Correspondence Control)
- L'Wanda Rosemond, General Operations Team
- Charles Miller, Post Audit Group, OCFO
- Headquarters and Regional Audit Managers

LUTHER COLLEGE

Richard L. Torgerson, Ph.D., President

JAN 28 2003

January 20, 2003

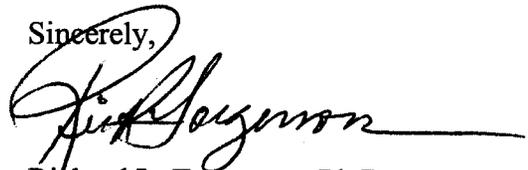
William Allen
Regional Inspector General for Audit
U.S. Department of Education
Office of Inspector General
8930 Ward Parkway, Suite 2401
Kansas City, MO 64114-3302

Dear Mr. Allen:

We received the Draft Audit Report (Control Number ED-OIG/A07C0031) of the September 2002 audit of the Educational Talent Search program at Luther College. As requested, please find attached our written response about the findings and recommendations contained in this report. We appreciate the opportunity to review our program so that we may improve services for the program participants.

Thank you for the opportunity to respond to the Draft Audit Report.

Sincerely,



Richard L. Torgerson, Ph.D.
President

RLT/lls

RESPONSE TO DRAFT AUDIT REPORT (Control Number ED-OIG/A07C0031)

After reviewing the Draft Audit Report (Control Number ED-OIG/A07C0031) dated December 24, 2002, we offer the following response. We want to emphasize that we are very desirous to be compliant with all legislation, regulations, and directives for the Educational Talent Search program.

Summary of Response

We do not concur with the findings or recommendations of the program review conducted by the Office of the Inspector General in September 2002. This review finds

1. a) Newsletters were not "countable" as project services;
b) The Blumen database was not sufficient as documentation of services.
Therefore, students who received only mailings or whose services were documented only through the Blumen database were not counted as participants.
2. Therefore, the Luther College Educational Talent Search program did not serve the number of participants it reported.
3. Therefore, the Luther College Educational Talent Search program was not in compliance with Department of Education legislation and regulations about participant numbers.

We respond, in brief,

1. a) Newsletters are project services;
b) Blumen database meets and exceeds requirements for documentation of services.
Therefore, students who received these services and/or whose services were documented through Blumen should be counted as participants.
2. Therefore, the Luther College Educational Talent Search served the number of students it reported.
3. Therefore, the Luther College Educational Talent Search was and is in compliance with the Department of Education legislation and regulations.

Elaboration of Response: Findings

In staff development workshops, trainers have always emphasized the importance of relating every program activity and decision to the legislation and regulations concerning Talent Search. This we have done. Therefore, our response begins with the relevant legislation and regulations and related remarks concerning participation, services, and recordkeeping. All regulatory citations are to the codification in effect as of July 1, 2001.

I. Relevant legislation and regulations:

Purposes

HEA Section 402B. Talent Search (also CFR 643.1)

- (a) Program Authority. The Secretary shall carry out a program to be known as talent search which shall be designed
 - (1) to identify qualified youths with potential for education at the postsecondary level and to encourage such youths to complete secondary school and to undertake a program of postsecondary education
 - (2) to publicize the availability of student financial assistance available to persons who pursue a program of postsecondary education; and
 - (3) to encourage persons who have not completed programs of education at the secondary or postsecondary level, but who have the ability to complete such programs, to reenter such programs.

Services

HEA Section 402B. Talent Search (also CFR 643.4)

- (b) Permissible Services. Any talent search project assisted under this chapter may provide services such as
 - (1) academic advice and assistance in secondary school and college course selection
 - (2) assistance in completing college admission and financial aid applications
 - (3) assistance in preparing for college entrance examinations;
 - (4) guidance on and assistance in secondary school reentry, entry to general educational development (GED) programs, other alternative education programs for secondary school dropouts, or postsecondary education;
 - (5) personal and career counseling or activities designed to acquaint individuals from disadvantaged backgrounds with careers in which the individuals are particularly underrepresented;
 - (6) tutorial services
 - (7) exposure to college campuses as well as cultural events, academic programs and other sites or activities not usually available to disadvantaged youth;
 - (8) workshops and counseling for families of students served;
 - (9) mentoring programs involving elementary or secondary school teachers or counselors, faculty members at institutions of higher education, students, or any combination of such persons;
 - (10) programs and activities as described in paragraphs (1) through (9) which are specially designed for students of limited English proficiency
 - (11) other activities designed to meet the purposes of the Talent Search program stated in 643.1, including activities to meet the specific educational needs of individuals in grades six through eight.

Comments on 643.4 from Appendix

What Services May a Project Provide? (643.4)

Discussion: The Secretary encourages applicants and grantees to exercise reasonable professional judgment when designing and delivering services. The Secretary finds that it would be inappropriate to delineate, with greater specificity, the types of services that may be provided by a Talent Search project. By listing a broad range of permissible services, the Secretary intends to encourage applicants to identify from a wide variety of possibilities the means of furthering the purposes of the Talent Search program in their communities.

Relevant Definitions from APR

Counseling means assistance with personal, educational, and career decision making.

Academic advising/course selection means assisting students in making educational plans, selecting appropriate courses, meeting academic requirements, and planning for high school graduation and admission to a postsecondary educational institution.

Family activities means events, workshops, meetings, and counseling designed to provide families with information on postsecondary educational opportunities and financial aid available and to involve them in the educational decisions of their children.

List of Services Provided by the Talent Search Program: [www.ed.gov/offices/OPE/HEP/trio/talent.html]

- Academic, financial, career, or personal counseling including advice on entry or re-entry to secondary or postsecondary programs
- Career exploration and aptitude assessment
- Tutorial services
- Information on postsecondary education
- Exposure to college campuses
- Information on student financial assistance
- Assistance in completing college admissions and financial aid applications
- Assistance in preparing for college entrance exams
- Mentoring programs
- Special activities for sixth, seventh, and eighth graders
- Workshops for the families of participants

Participant

CFR 643.7(b) Participant means an individual who

- (1) Is determined to be eligible to participate in the project under 643.3; and
- (2) Receives project services designed for his or her age or grade level

Recordkeeping

643.32(c) Recordkeeping. For each participant, a grantee shall maintain a record of—

- (1) The basis for the grantee's determination that the participant is eligible to participate in the project under 643.3
- (2) The grantee's needs assessment for the participant;
- (3) The services that are provided to the participant; and
- (4) The specific educational progress made by the participant as a result of these services

Dear Talent Search Project Director cover letter for APR 2002

Last year 95% of the Talent Search and EOC projects submitted the 2000-2001 performance report via the Web; this year we expect all projects to use the Web reporting feature.

Dear Applicant Letter from 2002 Educational Talent Search grant guideline

6. Talent Search and Educational Opportunity Center applicants are encouraged to describe how the project will use technology in managing the grant and in providing services, information, and assistance to participants.

II. Luther College Implementation of Regulations:

1. As did the auditors, we use the definition of participant (listed above) that is part of the Talent Search regulations. We disagree with the audit report's interpretation of "services." Relevant regulations and legislation about services are listed above. The audit report discounts the newsletter as a service and therefore discounts those participants who received only newsletters and other mailings. However, nowhere in the lists of services is there language that states or implies that newsletters and other informational mailings are excluded as eligible services.
2. We believe that the newsletter is an important activity of our program and provides both "academic advising" and "counseling" as its services. Perhaps it could also be counted as a "family activity" since it provides counseling to families, although we have not counted it this way. The monthly newsletters, sent to all students, routinely include age-appropriate
 - Study skills, test-taking, and homework tips (academic advising)
 - College readiness tips (academic advising)
 - Information about colleges and the application process (academic advising)
 - Financial aid and scholarship information (academic advising)
 - Information about careers, including careers in which ETS participants are likely to be underrepresented (counseling)
 - Motivational tips and values discussions (counseling)

In this way, the newsletter reinforces the curriculum provided in the school visits and workshops and enables those students who are unable to make school meetings to receive this important information.

It has the further advantage of making this information available to parents and other family members who are not able to attend school meetings and workshops.

Thus, we believe that our newsletters provide important services to participants by 1) providing information that participants may have missed because they were unable to attend regularly scheduled school meetings; 2) providing reinforcement of information, encouragement, and support provided to students who attended meetings; 3) providing reinforcement of information from teachers, guidance counselors, and school officials about school success and college readiness; 4) providing additional reminders of important deadlines in the college search and financial aid process for juniors and seniors and their parents; 5) providing information about educational and cultural opportunities offered to participants and families; and 6) promoting parent involvement in the academic progress of their children.

Note that we do not believe it is desirable to have students' only contact with us to be newsletters. In fact, we think this is most unfortunate. We strongly encourage participants and families to take advantage of the many services that the program offers. (See Appendix for this list.) In very, very few cases is the newsletter our only contact with students during their involvement with the program. We have worked and continue to work (see below for steps) to encourage and enable all students to meet individually and in groups with advisors and to attend activities and workshops. However, we believe that the newsletter helps the program to fulfill its purposes for students even when they are not able to attend meetings and activities. We also believe that it has the important value of making information available to parents and families as well as to participants.

3. Based on our positive experience with the latest version of the Blumen software, we have found that the Blumen database not only satisfies but far exceeds the requirements for documentation of program services. Recordkeeping, as the legislation above explains, must include, for each participant, the record of eligibility, the need for services, the services provided, and the academic progress that results from those services. The Blumen database enables this information to be recorded and reported. Furthermore, because it is a highly versatile database, the information can be manipulated in a number of additional ways for reports—a useful function as we monitor and assess program objectives. A more complete description of this database is included in the Appendix. We have used the Blumen database since the beginning of the program (1999). We have relied more and more heavily on it as our central recordkeeping system, in keeping with the Department of Education emphasis on technology use for program reporting, although we have always kept a paper file on each student as well.

As noted above, Talent Search programs have been strongly encouraged to use technology in recordkeeping and service provision. The APR must be submitted electronically, for instance; programs were given technology grants in 2001-2002; and new grant applicants were directed to list ways they would use technology in their programs. Technology has been emphasized in conferences and workshops. In moving toward a paperless recordkeeping system, we believed we were following the directives of the Department of Education.

We note that we have not been entirely satisfied with Blumen and seriously considered dropping the database in 2000. But in 2001, with program updates and support improvements, we became much more confident about the reliability and versatility of the program. Though we continue to find glitches, we work with the Blumen technical support personnel to remedy them. When the Office of the Inspector General audit team came, we provided them with a list of those problems we had encountered as we prepared the end of the year report—including the problem mentioned in footnote 1. We remedied these and other problems on the list so that the APR was complete and accurate. (We can provide more information about Blumen glitches, if desired.)

Corrective Actions to Improve the Program

As stated earlier in this document, we will vigorously continue to seek improvement in our Educational Talent Search program. We are very desirous to be compliant with all Department of Education legislation, regulations, and directives. Therefore, we have detailed the steps below that we have already taken and will continue to take to improve the Luther College Talent Search program. We welcome the Department of Education support as we work to improve our services to students.

Steps:

1. **Services:** Our major goal is to continue to improve the quality and quantity of our service to students. We have ensured that we keep a schedule of regular school visits so that all students are enabled to see us individually and/or in groups. Although we have a large geographical area and many schools, this is a challenge that we have always been able to meet.

A related goal has been to increase service to those students who, for whatever reason, have not availed themselves of program services, apart from receiving newsletters. This fall, we made it a top priority to see all students at least once (even if they did not attend school visits, workshops, or events) and to move those students to an “inactive” category if they do not wish to participate or no longer feel they need services. By June 15, we plan to see all students at least twice. (For those few students whom we are unable to see face to face, we will conduct conversations through email or phone.) In these meetings, we can (a) encourage students to become more active, (b) ensure that they have received the newsletters and mailings and know about activities and services, (c) check academic progress, and (d) determine if students feel they continue to need program services. Please note that we consider such contact minimal; we provide opportunities for most students to see an advisor at least once or twice monthly.

We also have continued to work on the quality and depth of our curriculum as it “closes the gaps” of the regular school curricula and guidance information. Last summer, we assembled and catalogued forms, lessons plans, and activities, arranged by age (middle school, high school, adult), for study skills, college search, career search, and values. While we had all used similar materials in our workshops and school visits, we had not

necessarily pooled this information. We continue to add to and change this central curriculum resource.

We continue to offer workshops and activities to encourage the active participation of all students. We continue to monitor the needs of participants and to provide appropriate services.

2. **Recordkeeping:** We have changed our documentation procedures so that we have paper as well as electronic documentation of virtually all services. Each school visit and activity now has paper as well as electronic documentation.

New Procedure (provides electronic and paper record)

- a) For school visits, advisors complete cover sheet detailing activity (content, amount of time, group or individual) with students
Advisors attach dated sign-up sheet of participants
Student worker enters service information in Blumen based on paper information
Student worker and advisor double-check data entry
Student worker photocopies paper form and sign-up sheet
Advisors file paper copies of Blumen entries/sign-up sheets
Student worker files contact information, when appropriate, in participant files
- b) For newsletters, administrative assistant enters on database and keeps file copy
- c) For group activities, field trips, and workshops, administrative assistant enters on database and files sign-up sheet.
- d) Exception: For phone calls, paper backup is usually not provided, unless a follow-up letter is typed and filed. These contacts are put directly into the database and are marked as phone calls.

We are happy to provide any additional information and documentation, as required.

Elaboration of Response: Recommendations

Because we do not concur with the findings of the Office of the Inspector General Draft Audit Report ED-OIG/A07C0031, we do not concur with their recommended sanctions of the Talent Search Program at Luther College. However, we welcome the opportunity to work with Department of Education officials to improve the provision and documentation of services.

We appreciate the opportunity to respond to the Draft Audit Report (Control Number ED-OIG/A07C0031).

Appendix: List of ETS Services
Blumen Description

Services Offered By Educational Talent Search (ETS)

Junior High/Middle School (11-14 years)	Senior High School (14-18 years)	Adult (18-27 years)
ACADEMIC ADVISING	ACADEMIC ADVISING ACT/SAT PREPARATION Information packets Practice tests Fee waivers for eligible students	ACADEMIC ADVISING ACT/SAT PREPARATION Information packets Practice tests
CAREER EXPLORATION Career counseling Career assessments	CAREER EXPLORATION Career counseling Career assessments	CAREER EXPLORATION Career counseling Career assessments
COLLEGE PLANNING Post-secondary information Campus visits	COLLEGE PLANNING Post-secondary information Campus visits Admissions process	COLLEGE PLANNING Post-secondary information Campus visits Admissions process
CULTURAL OPPORTUNITIES Field trips Work-site visits	CULTURAL OPPORTUNITIES Field trips Work-site visits	CULTURAL OPPORTUNITIES Field trips Work-site visits
FINANCIAL AID Federal/State Information	FINANCIAL AID Federal/State Information Application process Scholarship information	FINANCIAL AID Federal/State Information Application process Scholarship information
MENTORING SERVICES	MENTORING SERVICES	MENTORING SERVICES
MOTIVATIONAL ACTIVITIES	MOTIVATIONAL ACTIVITIES	MOTIVATIONAL ACTIVITIES
SELF-ESTEEM ACTIVITIES STUDY SKILLS Note taking skills Test taking skills Time management	SELF-ESTEEM ACTIVITIES STUDY SKILLS Note taking skills Test taking skills Time management	SELF-ESTEEM ACTIVITIES STUDY SKILLS Note taking skills Test taking skills Time management
TUTORING ASSISTANCE Trained/paid tutors	TUTORING ASSISTANCE Trained/paid tutors	

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The most popular software to help you run your project more efficiently at an unbeatable price!!!

BLUMEN

Blumen is a contact management software that allows you to enter client information and produce reports for data analysis. Blumen is specially developed to help counselors at universities, colleges, schools, business offices and medium sized private companies to track clients and log contacts for them.

HOW TO GET ORGANIZED AND STAY THAT WAY

Still using Excel, Filemaker Pro, Access etc. to organize your clients??

Maybe you and your department needs something more sophisticated than client names pinned to a bulletin board to keep track of your key contacts. Blumen organizes your client information in one place. It comes with an easy-to-use, full-featured database with predefined fields and additional customizing fields for your specific needs and allows you to store complete contact information including name, university, school, grade, phone numbers, address, website, e-mail address, and much more. With Blumen you can keep history of conversation and completed activity. Other advantages of Blumen are that you can find anyone or any detail quickly using the instant Lookup feature.

TIME MANAGEMENT SOLUTIONS THAT WORK

How to avoid falling into the trap of working more and accomplishing less??

Blumen tries to minimize your work load and allows you to accomplish more in less time. The software has a built in feature to write personalized letters, e-mail broadcast and mail merge to hundreds. Blumen has more than 125 built in statistical and managerial reports and you can also create unlimited customized reports. With Blumen you can view and print monthly/ quarterly/ annual reports in seconds. You can also save the report in various formats like fixed-length, comma-separated, tab-delimited or HTML format or export any report to Excel, Word or other database applications.



CLIENT CONTACT & APPOINTMENT REMINDERS

Do you still tally your contacts manually??

The main power behind Blumen is its capability to track services provided to the clients. Using the Contact Log, you can track every contact you make with your client. Get a bird's eye view of everything on your contacts using the built-in Contact List where you can filter by counselor, advisor, staff or date range. Print a detailed contact report which summarizes the logged hours by each service, counselor, advisor or client. Blumen will also remind you of your future appointments with your clients.

POWERFUL FEATURES THAT HELP YOU GET THE JOB DONE

How to recognize the powerful features of a tracking software??

Blumen can work on various operating systems (Windows and Macintosh). It is network ready for multiple users and counselors that are out on the field can also record contacts by using the Remote Access feature. You can also analyze your data visually using graphs, pie charts and bar charts. Blumen has an exceptional feature for screen level security. Blumen provides extensive password security throughout the product allowing you to restrict access to specific screens where you don't want data entry personnel to make entries.

TECHNOLOGY AT ITS' BEST

LIVE WEB TRAINING

Everyone agrees that training is vital in today's fast-moving and highly competitive business environment. The problem comes in delivering the level of training you need within shrinking time frames and shrinking budgets. Live Web Training delivers the human interaction benefits of classroom learning, combined with the convenience of the Internet without leaving the workplace or home, saving you in travel costs and time.

SELF PACED WEB TUTORIAL

If you want a comprehensive learning experience, but prefer a more independent approach, try our self-paced web tutorial. This tutorial is available 24 hrs a day 7 days a week and is very cost effective than just any other learning option.

LIVE WEB SUPPORT

Even with the best phone support sometimes the customer still requires a more intensive support. Live web support is an interactive customer service environment that's significantly more personal and more effective. It is as good as our support specialist being at your site while still being miles away from you.

STILL NOT SURE TO PURCHASE BLUMEN??

Visit our web site at www.compansol.com for a FREE DEMO and try it on your own.

STILL NOT CONVINCED ??

Visit our site at www.compansol.com and sign-up for LIVE WEB DEMO. You will see a live demonstration of the Blumen software and can ask questions to the presenter.

CUSTOMER SUPPORT THAT REALLY MAKES A DIFFERENCE

- One year FREE Technical Support
- Unlimited E-Mail Support
- Unlimited TOLL FREE Phone Support
- Unlimited LIVE WEB Support
- On-line Message Board
- Hands-On Computer Training
- On-Site Training
- Updates and Upgrades at discounted prices

GOT QUESTIONS??

If you have any questions, please visit our web site at www.compansol.com, give us a call at 1-800-597-8204 or send us an e-mail at support@compansol.com

