

Department of Reporting and Regulatory Accountability
MONTGOMERY COUNTY PUBLIC SCHOOLS
Rockville, Maryland

June 11, 2008

MEMORANDUM

To: Board of Education Policy Committee

From: Christina Yuknis, Policy Evaluation Specialist

Subject: Executive Summary of the Evaluation of Policy CNA, *Informational Material and Announcements*

Background

At the request of the Montgomery County Board of Education Policy Committee, the Department of Reporting and Regulatory Accountability (DRRA) reviewed and evaluated the implementation of Board of Education Policy CNA, *Informational Material and Announcements*, to determine if the Board's desired outcomes have been achieved. In collaboration with the Office of School Performance (OSP), DRRA evaluated the distribution and display of informational materials and flyers during the spring of 2008 for alignment with Policy CNA and its accompanying Montgomery County Public Schools Regulation CNA-RA, *Informational Material and Announcements*.

The processes identified in Policy CNA and Regulation CNA-RA are specifically designed to meet the purpose, "To inform the public and staff about displaying and distributing printed informational materials and announcements" (Section A). The review determined that the desired outcomes are being achieved; however opportunities for improvement remain.

Methodology

The data collection had three components—document analysis, surveys, and site visits. These items were used to determine the extent to which criteria are being met and to triangulate the final results of this evaluation.

Conclusions

Policy CNA is being implemented. However, there are opportunities for improvement. There are three main issues that need to be addressed to improve the consistency of implementation: ensuring that materials distributed to students include the disclaimer¹, requiring that

¹ The disclaimer states: "These materials are neither sponsored nor endorsed by the Board of Education of Montgomery County, the superintendent, or this school."

organizations provide a copy of their nonprofit status before distributing materials, and educating staff on the criteria for distribution.

Materials from nonprofit community organizations distributed to students do not always include the disclaimer. This also is true of materials placed on informational display areas. Staff members need to ensure that any materials from nonprofit community organizations and businesses include a disclaimer.

Additionally, schools are distributing materials from businesses and organizations whose nonprofit status is undetermined. This could be due to a lack of clarity in Policy CNA; an issue raised during the Policy Evaluation Advisory Committee. It may be helpful to clearly delineate the differences between what nonprofit organizations are permitted to do and what businesses are permitted to do by separating Section C.2 into two paragraphs.

The third issue centers on the “OSP stamp” that was referenced during the Policy Evaluation Advisory Committee and at site visits. This stamp was used to approve materials for distribution prior to the revision of Policy CNA into its current form. Previously, schools were not permitted to distribute materials that did not have the stamp. Since the policy was revised in 2006, OSP has not used the stamp, since each school can now determine whether or not materials meet the criteria for distribution. Two schools sent a copy of a flyer that showed the stamp. A follow-up revealed that community organizations were cutting out old stamps and copying flyers with the stamp on it. School staff needs to be informed that they make the determination of whether or not a flyer meets the criteria for distribution and that the OSP stamp is unacceptable. As a result of the follow-up, OSP has drafted a memorandum for schools that will remind staff of the policy parameters.

Recommendations

To promote more consistent and effective implementation of Policy CNA, MCPS could—

- Provide periodic reminders to school staff of the requirements in the policy and regulation.
- Ensure that all items for distribution or display that are from nonprofit community organizations or businesses include the disclaimer.
- Require proof of nonprofit status from organizations wishing to distribute materials directly to students. Schools should keep these letters as a reference at least until the end of the school year.
- Inform schools that the OSP approval stamp is no longer used and procedures to follow for materials that arrive with the stamp.
- Clarify language in the regulation that describes what community nonprofit organizations are permitted to do and what businesses are permitted to do.



**Policy Evaluation Report:
Implementation of Board of Education Policy CNA,
*Informational Material and Announcements***

Department of Reporting and Regulatory Accountability

June 2008

Christina Yuknis



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At the request of the Montgomery County Board of Education Policy Committee, the Department of Reporting and Regulatory Accountability (DRRA) reviewed and evaluated the implementation of Board of Education Policy CNA, *Informational Material and Announcements*, to determine if the Board's desired outcomes have been achieved. In collaboration with the Office of School Performance (OSP), DRRA evaluated the distribution and display of informational materials and flyers during the spring of 2008 for alignment with Policy CNA and its accompanying Montgomery County Public Schools (MCPS) Regulation CNA-RA, *Informational Material and Announcements*.

The processes identified in Policy CNA and Regulation CNA-RA are specifically designed to meet the purpose, "To inform the public and staff about displaying and distributing printed informational materials and announcements" (Section A). The review determined that the desired outcomes are being achieved; however, opportunities for improvement remain.

This report details the evaluation methodology used, explains the results, provides examples of successful practices, and suggests opportunities for improvement.

Definitions

The following definitions were derived from Policy CNA and Regulation CNA-RA:

- *Community Organization or Business*: A group or business operating in Montgomery County.
- *Nonprofit Community Organization*: Organizations that operate in Montgomery County that provide documentation of nonprofit status. This documentation must either be a copy of the letter from the Internal Revenue Service stating that the organization is considered tax exempt under Section 501(c)(3) or a copy of a notarized letter on the organization's letterhead stating that the organization is a nonprofit organization.

Minimum Criteria for Success

The criteria used to determine success were identified using the position statements set forth in the policy. To be successful, the criteria needed to be applied consistently systemwide. Below are the criteria for a successful implementation of Policy CNA.

- MCPS, government entities, parent teacher associations (PTAs), and parent teacher organizations operating at special education schools and alternative centers are permitted to distribute materials and announcements at any time. All material submitted by these organizations have been distributed.
- Other nonprofit community organizations have the opportunity to distribute materials directly to students at least twice a year, but no more than once during each marking period.
- Schools with a designated location accept informational materials and announcements from community organizations or businesses for display.

- All materials provided for distribution or display by organizations or businesses include the disclaimer: “These materials are neither sponsored nor endorsed by the Board of Education of Montgomery County, the superintendent, or this school.”
- A regulation was created and is viewpoint-neutral.

Methodology

Prior to the evaluation process, DRRA staff met with OSP staff to review the policy, clarify concepts, and determine the data necessary for the evaluation.

Policy Evaluation Advisory Committee

The Policy Evaluation Advisory Committee met to discuss the direction of the evaluation of Policy CNA. The advisory committee consists of members from various stakeholder groups (see Appendix A). Present at the meeting to discuss Policy CNA were parents, a Montgomery County Council of Parent Teacher Associations (MCCPTA) representative, students, and school-based staff. Members of the committee shared their experiences concerning informational flyers that are distributed to students and displayed in the schools. They also provided feedback on their perceptions of the policy. Using this information, DRRA staff determined the sample and data collection methods.

Data Collection

Three different sources were used to collect and analyze data. The different types of data were used to determine the extent to which criteria are being met and to triangulate the final results.

- Document review was conducted for the following items:
 - Materials distributed by select schools
 - Materials on display at select schools
 - Regulation CNA-RA
- Site visits were conducted to view the display centers of select schools.
- Surveys were conducted via email, telephone, and in person with the following:
 - PTA presidents
 - Parents from select schools
 - Students
 - Community organization representatives

Sample Selection Procedures

Schools were randomly chosen within each quad/quint-cluster to participate in either the document analysis or a site visit. Twelve schools, one elementary school and one secondary school from each quad/quint-cluster, participated in the site visits. Forty schools were selected for the document analysis. Those 40 schools consisted of at least 3 elementary schools, 2 middle schools, and 1 high school from each quad/quint-cluster.

Document Review

The document review consisted of an examination of materials distributed by 40 schools in April. Additionally, any materials that were on display at the 12 schools selected for a site visit have been reviewed.

Site Visits

Site visits consisted of a review of the display center and a brief interview of the principal or administrative secretary. There were five structured questions, as well as an opportunity to share any comments regarding the policy (see Appendix B). A set of “look-fors” was created to assist the review of the display center. The look-fors were developed based on requirements in the policy and included the location of the display, the materials in the display, inclusion of the disclaimer, and organizations that provide materials to the display.

PTA Survey

In early April, the MCCPTA was asked for assistance in gaining input regarding PTA experiences with Policy CNA. It was agreed that the evaluator would contact PTA presidents at the 12 schools selected for site visits. If a school did not have a PTA, an alternate was chosen from the list of schools chosen for document analysis.

PTA presidents at the selected schools were sent a brief email survey regarding their experiences with distributing materials to students (see Appendix C). Seven of 12 PTA presidents responded to the email. The remaining 5 were then called for a telephone survey. This yielded an additional response, for a total of eight responses. The email and phone surveys consisted of structured, open-ended questions, as well as an opportunity to share other comments regarding the policy.

Parent Survey

During site visits, principals were asked for the best way to reach parents in order to gain input regarding their experiences with Policy CNA. Principals offered one of two ways to do this: attend a school function and approach parents or include an announcement in the school newsletter.

Feedback from 43 parents was received. The parents were briefly asked about their experiences with flyer distribution and display (see Appendix D). The parent survey consisted of a set of structured questions and provided an opportunity to share any comments regarding the policy.

Student Survey

In early April, the Student Affairs Office was asked for assistance in gaining input regarding student experiences with Policy CNA. It was agreed that the evaluator would attend a Montgomery County Region (MCR) of the Maryland Association of Student Councils meeting to survey students. The survey sample consisted of students participating as delegates to the MCR meeting in May 2008. The survey consisted of structured, open-ended questions and an

opportunity for students to share any comments regarding the policy (see Appendix E). A total of 61 high school students completed the survey.

Community Organization Survey

Once flyers were collected and analyzed, organizations that distributed materials to at least 7 schools were identified to participate in a survey. A total of 7 organizations met this criterion and were contacted in May 2008.

Feedback from all 7 organizations was received. The organizations were briefly asked about their experiences with flyer distribution (see Appendix F). The survey consisted of a set of structured questions and provided an opportunity to share any comments and feedback regarding the policy.

Results

In this section, the results of the data collection are presented. Each of the criteria for success is listed, and the supporting data are described. Other relevant findings also are included in each section.

In April, 52 nonprofit community organizations and businesses distributed a total of 282 flyers from the 40 schools identified for data collection. There were 134 unique flyers; each flyer advertised a different event or activity. This included materials from MCPS, individual schools, PTAs, governmental agencies, nonprofit community organizations, and businesses. Table 1 shows the number of flyers distributed for each group by schools.

Table 1.
Number of flyers distributed by 40 schools in April 2008.

Organization	Unique flyers N	Total flyers N
MCPS	10	36
Schools	23	23
PTAs	9	9
Governmental agencies ^a	33	64
Nonprofit community organizations	51	135
Businesses ^b	8	15
Total	134	282

^a This category includes Maryland State Department of Education, Montgomery County agencies, other county agencies, and town governments.

^b This category includes businesses whose for-profit status has been confirmed and other organizations whose nonprofit status could not be determined.

The quantity of materials showed some statistically significant differences¹ based on the level of school (see Table 2). Elementary schools receive more materials than middle and high schools.

¹ A Chi-square test was used. $p = .022$

This was also confirmed anecdotally through parent interviews and at the Policy Evaluation Advisory Committee.

Twenty elementary schools provided copies of materials they distributed in April. Each school sent home between 3 and 24 flyers, with an average of 9 flyers per school. Middle schools (n=12) distributed between 0 and 16 flyers with an average of 6 per school (mode = 4). High schools (n=8) distributed between 0 and 6 flyers with an average of 3 per school (mode = 1 and 3).

The same test of statistical significance showed no differences² based on geographic location in the county. Schools in various parts of the county distributed similar quantities of flyers in April.

Table 2.
Quantity of flyers distributed by schools in April 2008.

School Level	Mean	Mode	Number of flyers distributed				
			0	1-5	6-10	11-15	16-24
Elementary	9	6	0	2	12	4	2
Middle	6	4	1	6	2	2	1
High	3	1,3 ^a	1	6	1	0	0
Total	7	6	2	14	15	6	3

^a There are multiple modes for high schools.

MCPS, government entities, PTAs, and parent teacher organizations operating at special education schools and alternative centers are permitted to distribute materials and announcements at any time. All material submitted by these organizations have been distributed.

To address this criterion, data were collected in two ways. The first was to review any materials that were denied distribution in April 2008 by the sample schools. The second was to interview PTA presidents about their experiences in distributing materials.

The only materials that were denied distribution by schools in April 2008 were from businesses, organizations that did not prove a nonprofit status, and nonprofit organizations that did not include a disclaimer on their materials. No materials from MCPS, government entities, PTAs, or other parent teacher organizations were denied distribution or display.

The PTA president interviews supported this finding. Each of the PTA presidents who answered the survey questions indicated that materials they prepared for distribution had always been distributed at their child's school.

Although student government organizations are not listed in this criterion, students participating in the MCR meeting were asked how their schools' Student Government Association (SGA) informs students of activities. SGAs use a variety of methods to inform students of activities, including distribution of flyers, making announcements, continuous television announcements in the media center, posting banners and flyers in the halls, and using class representatives to share information. Two students specifically mentioned receiving approval from administration prior

² A Chi-square test was used. p = .484

to distributing flyers. One student felt that distributing flyers was not allowed and expressed that the principal would not be supportive of this.

Other nonprofit community organizations have the opportunity to distribute materials directly to students at least twice a year, but no more than once during each marking period.

Other nonprofit community organizations have been given the opportunity to distribute materials directly to students four times a year — once each quarter (as per Regulation CNA-RA). Each school determines the four dates for distribution. Those dates are given to OSP, and the information is published on a web page created by OSP (<http://www.montgomeryschoolsmd.org/info/flyers/>).

Representatives from the community organizations indicated that, overall, the policy is helpful for them in distributing materials to students. Three representatives stated that they had encountered school staff who are unaware of the requirements in the policy and regulation. After providing a copy of the policy or regulation, their materials were accepted for distribution at the school. The organization representatives recommended that school staff receive periodic reminders of the policy. Two representatives expressed that the timing does not meet their distribution needs.

In addition, parents and students were asked to share their opinions regarding the frequency and quantity of materials received. Parents and students felt that both the quantity and frequency of materials they received was appropriate. See Table 3 for more information.

Table 3.
Parent and Student Opinions to Quantity and Frequency of Flyer Distribution

	Quantity			Frequency		
	Not enough	Appropriate	Too much	Not often enough/would like more	Appropriate	Too often
Students						
N	13	27	20	16	34	10
% ^a	21	45	33	27	57	17
Parents						
N	7	31	5	13	27	3
% ^a	16	72	12	30	63	7

^a Percentages may not add up to 100 due to rounding.

Schools with a designated location accept informational materials and announcements from community organizations or businesses for display.

Twelve schools were selected to have a site visit to review their informational displays. Each school had a display center that was located in or near the main office, and most schools utilized a table or a magazine rack to display materials.

Every school had materials from MCPS, 10 schools had materials from government entities, and 5 schools had materials from PTAs. Materials from 28 nonprofit community organizations and

businesses were on display at 10 schools. The two schools without materials from community organizations and businesses were high schools.

All materials provided for distribution or display by organizations or businesses include the disclaimer: “These materials are neither sponsored nor endorsed by the Board of Education of Montgomery County, the superintendent, or this school.”

There were 40 unique items on display at the site visit schools that were from community organizations or businesses. Disclaimers were included on 32, or 80 percent, of the items. Two schools indicated that they had each rejected one item this year because there was no disclaimer.

Of 59 unique items from community organizations and businesses that were distributed in April, 52 (88 percent) included the disclaimer. Three additional items were submitted to schools for distribution and subsequently denied distribution because there was no disclaimer. Additionally, 51 (86 percent) of those items were from organizations whose nonprofit status has been confirmed. The remaining 8 items were either confirmed for-profit businesses or their profit status could not be determined.

A regulation was created and is viewpoint-neutral.

A review of Regulation CNA-RA indicates that it is viewpoint neutral. The regulation identifies the processes that should be used by organizations and businesses for distributing and displaying information materials and the way local schools are to implement the policy. Preference is not given to any group, organization, or set of ideas. Community organizations and businesses may submit materials for display or distribution if they meet the requirements set forth in the regulation. This includes delivering materials by a specified time, collating materials into class sets of 30, including the disclaimer, and proving nonprofit status (for organizations desiring distribution). OSP also has created a decision tree worksheet to assist schools in objectively determining whether materials are suitable for distribution or display (see Appendix E). The decision tree also is published on the flyer web page noted previously.

To provide an appropriate mechanism for informing students and parents about school and community activities and events in a manner that does not unduly burden school staff.

Although this is not a criterion for success, it is the issue statement from the policy, and some data were collected on this in the evaluation process. There are two parts to this statement: informing students and parents about community activities and not unduly burdening staff.

Informing students and parents about community activities — In general, parents expressed satisfaction with both the quantity of materials and frequency that materials are sent home. A few parents said that the amount is overwhelming, but a greater number said that, if anything, more is better. Several people expressed a desire to have the frequency that community organizations may distribute materials be increased to monthly.

The number of parents who do not know about the school’s display center (n = 17) is equal to the number that know and use it (n = 17). There is a third group of parents who know of the display center, but do not use it (n=8). Approximately 61 percent (n = 37) of students surveyed were not aware of or familiar with the school’s display center.

One of the greatest issues confronting schools now concerning how to keep parents informed is the issue of “going green.” Parents and school staff are divided in whether to save paper and use electronic media or to send flyers home. Five parents at three site visit schools expressed a desire to use more electronic media. Two parents expressed a desire to continue to receive flyers in a paper form; they expressed that it is more convenient to have the printed version since they cannot always access email. Three schools indicated that they have already moved in the direction of electronic information. Two schools, both elementary, use a mix of paper distribution and electronic newsletters. The third, a high school, appears to use electronic media almost exclusively.

Unlike parents and staff, the students consistently expressed a desire to save paper and post flyers on the Internet. Eight students directly commented about this topic. They expressed the existing use of the Internet to share information, the desire to increase use of the Internet for such a purpose, or a desire to eliminate wasted paper.

Not unduly burdening staff — The question of what constitutes an undue burden on school staff was brought up in the Policy Evaluation Advisory Committee. Members of the committee were not sure what constitutes an undue burden. As a result, site visits included a question for staff about the burden on them to display and distribute materials. Eleven of the 12 schools noted that maintaining the display was minimal to no burden; they viewed it as part of the routine to straighten up and remove outdated materials. The remaining staff stated that maintaining the display requires work daily; this was viewed as a burden.

Staff in five schools indicated that distributing materials was more burdensome, although in only one school was it viewed as an undue burden. The office staff in one of those schools estimated that it takes about three hours a week to prepare the weekly folders. In addition, teachers and paraeducators distribute materials to their students, which decreases time for instruction.

In two schools, staff remarked that as the distribution date approaches, they are inundated with materials from community organizations. They receive between 12 and 15 flyers each distribution date. Space becomes an issue since there is no place to store all of these materials.

Conclusions

Policy CNA is being implemented. However, there are opportunities for improvement. There are three main issues that need to be addressed to improve the consistency of implementation: ensuring that materials distributed to students include the disclaimer, requiring that organizations provide a copy of their nonprofit status before distributing materials, and educating staff on the criteria for distribution.

Materials from nonprofit community organizations distributed to students do not always include the disclaimer. This also is true of materials placed on informational display areas. Staff members need to ensure that any materials from nonprofit community organizations and businesses include the disclaimer.

Additionally, schools are distributing materials from businesses and organizations whose nonprofit status is undetermined. This could be due to a lack of clarity in Policy CNA; an issue

raised during the Policy Evaluation Advisory Committee. It may be helpful to clearly delineate the differences between what nonprofit organizations are permitted to do and what businesses are permitted to do by separating Section C.2 into two paragraphs.

The third issue centers on the “OSP stamp” that was referenced during the Policy Evaluation Advisory Committee and at site visits. This stamp was used to approve materials for distribution prior to the revision of Policy CNA into its current form. Previously, schools were not permitted to distribute materials that did not have the stamp. Since the policy was revised in 2006, OSP has not used the stamp, since each school can now determine whether or not materials meet the criteria for distribution. Two schools sent a copy of a flyer that showed the stamp. A follow-up revealed that community organizations were cutting out old stamps and copying flyers with the stamp on it. School staff needs to be informed that they make the determination of whether or not a flyer meets the criteria for distribution and that the OSP stamp is unacceptable. As a result of the follow-up, OSP has drafted a memorandum for schools that will remind staff of the policy parameters.

Recommendations

To promote more consistent and effective implementation of Policy CNA, MCPS could—

- Provide periodic reminders to school staff of the requirements in the policy and regulation.
- Ensure that all items for distribution or display that are from nonprofit community organizations or businesses include the disclaimer.
- Require proof of nonprofit status from organizations wishing to distribute materials directly to students. Schools should keep these letters as a reference at least until the end of the school year.
- Inform schools that the OSP approval stamp is no longer used and procedures to follow for materials that arrive with the stamp.
- Clarify language in the regulation that describes what community nonprofit organizations are permitted to do and what businesses are permitted to do.

Appendix A: Policy Evaluation Advisory Committee

The organizations and stakeholders listed below have been invited to join the Policy Evaluation Advisory Committee. An asterisk (*) indicates attendance at the meeting to discuss Policy CNA.

- *Asian American Parents Advocacy Council*
- *Central office staff*
- *Family and Community Partnerships*
- *Gifted and Talented Association of Montgomery County*
- *Hispanic Alliance*
- *Identity*
- *Linkages to Learning*
- *MCCPTA **
- *MCNeeds*
- *Montgomery County Association of Administrative and Supervisory Personnel*
- *Montgomery County Business Roundtable for Education*
- *Montgomery County Education Association*
- *National Association for the Advancement of Colored People (NAACP)*
- *Parents **
- *Service Employees International Union **
- *Students **

Appendix B: Site Visit Questions

1. How often do people visit the display center?
2. How do you share the location of the informational display center with parents?
3. What materials have you rejected for display this year? Why?
4. What is the burden on the staff to maintain the displays and distribute materials?
5. What is the best way to find out the experiences of parents in relation to Policy CNA?
6. Is there anything else you would like to say about the policy?

Appendix C: PTA President Survey Questions

1. How often does the PTA distribute materials to students?
2. What type of materials does the PTA distribute to students? (Newsletters, flyers, information about PTA-sponsored activities, etc.)
3. What is the process for the PTA to have materials distributed? (Do you need to obtain any type of approval? Do you submit them to a specific person? Is there a form to complete? Do you count materials into class sets? Do you place materials into teachers' mailboxes?)
4. Has the PTA ever had materials denied for distribution? If so, please explain the circumstances.
5. Do you have any additional comments or feedback?

Appendix D: Parent Survey Questions

1. How do you feel about the quantity of flyers you receive from your school?
2. How do you feel about the frequency of materials being sent home from the school?
3. Are you familiar with the school's display center? If so, describe your experiences with it.
4. Other comments?

Appendix E: Student Survey Questions

1. Describe the process used for SGA to distribute materials to students throughout your school.
2. What do you think about the quantity of flyers you receive from your school?
 - a. not enough
 - b. just right
 - c. too many

Comments:
3. What do you think about how often materials are sent home from your school?
 - a. not often enough
 - b. just right
 - c. too often

Comments:
4. Are you familiar with your school's display center for informational materials and announcements?
NO **YES:** If yes, describe your experiences with it.
5. Additional comments, suggestions, or feedback:

Appendix F: Community Organization Survey Questions

1. How did you learn about the flyer distribution policy?
2. What is your typical distribution pattern? (time of year, clusters, school level, etc.)
3. How does the process work for you?
4. Do you have any additional comments or feedback?

