

FINAL REPORT OF REVIEW

**Montgomery County Public Schools’
Acquisition of Promethean Interactive
Classroom Technology
OIG Report Number: 14-002**

November 30, 2013



**Montgomery County, Maryland
Office of the Inspector General**

REPORT IN BRIEF
OFFICE OF THE INSPECTOR GENERAL
November 30, 2013

Background

From 2005 to 2008, Montgomery County Public Schools (MCPS) began installing SMART Technologies and Promethean interactive classroom systems. In 2008, MCPS expanded its technology pilot program and installed predominantly Promethean systems. Since 2008, MCPS purchased 4,600 Promethean systems that are the subject of this report.

Why We Did This Review

We received complaints that MCPS obtained Promethean systems in a no-bid procurement and did not evaluate other technologies. The County Council also raised concerns about MCPS' request for appropriations for the Promethean funding.

Our objectives in this review were (1) to determine whether MCPS complied with state laws and MCPS policy requirements in acquiring the Promethean systems and (2) whether MCPS obtained a reasonable price.

What We Found

MCPS adopted the Promethean systems as its technology standard. When we asked to see the documentation supporting the decision, we learned that MCPS does not require formal documentation in establishing a technology standard. We found no evidence suggesting the Promethean systems were not an appropriate technology standard.

We reviewed MCPS procurement actions relative to the Promethean purchases and found that MCPS's actions were consistent with state laws, MCPS policy requirements, and appropriations as proposed by the Board of Education. Maryland Code and MCPS policy require that purchases exceeding \$25,000 be subject to solicitation of bids through advertisement unless MCPS participates in a cooperative contract awarded by other public agencies or intergovernmental purchasing organizations, where the lead agency conducted a competitive bid process. MCPS acquired the Promethean systems through a cooperative contract and therefore did not have to solicit bids for the procurements.

To determine if MCPS obtained a favorable price for the Promethean procurement, we obtained information from other school systems that purchased Promethean systems and compared those to the prices MCPS obtained. We determined MCPS received the most favorable price.

What We Recommended

We conducted this review while the Promethean procurement process was ongoing and we were prepared to alert MCPS of any potential problems or concerns. Based on our review, no recommendations were made.

However, we did notify MCPS that lack of documentation supporting a standard may be subject to challenges by stakeholders and competing vendors, and could even present appearances of improper financial relationships.

Montgomery County Maryland Office of the Inspector General

**Review of Montgomery County Public Schools' Acquisition of
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Introduction and Summary

The Office of the Inspector General (OIG) conducted a review of the Montgomery County Public Schools' (MCPS) acquisition of Promethean interactive white board systems. We conducted this review in response to complaints submitted to the OIG and concerns raised during the County Council's consideration of the MCPS request for a Special Appropriation to the fiscal year (FY) 2013 Capital Budget and Amendment to the FY 13-18 Capital Improvements Program (CIP) relative to its Technology Modernization project.

During Council deliberations, questions were raised regarding why MCPS had selected the Promethean system over competing products, the process that MCPS followed to procure the interactive white board systems, and the request of a special appropriation to apply Federal Education-Rate (e-Rate) funds¹ toward the procurement.

The information we obtained during our review demonstrated that MCPS did not document an analysis in selecting its technology standards. However, we found no criteria requiring preparation of a formal analysis in selecting a standard.

We determined that MCPS procurement actions were consistent with state laws and MCPS procurement requirements, and appropriated funds were being used as proposed by the Board of Education (BoE) to the County Council. We also determined that the prices MCPS obtained for the Promethean interactive whiteboard systems were lower than those obtained by some school systems, and comparable to the prices obtained by another school system.

Objectives, Scope, and Methodology

The objectives of our review were to determine whether MCPS complied with state laws and MCPS policy requirements in acquiring 4,600 Promethean whiteboard systems and whether MCPS obtained a reasonable price for the Promethean systems.

A more detailed scope and methodology of our review are detailed in Appendix A.

¹ The Schools and Libraries Program of the Universal Service Fund is commonly referred to as "E-Rate." It is administered under the direction of the Federal Communications Commission and provides discounts to assist most schools and libraries to obtain affordable telecommunications and internet access.

Background and Facts

During the three school years that began in 2005 and ended in 2008, MCPS deployed 242 Smart Technologies and 175 Promethean interactive classroom systems, the two leading providers of interactive white board systems at the time.

Beginning with the 2008-09 school year, MCPS installed Promethean interactive classroom technology systems predominantly; one SMART Technology system was installed in FY10.

In June, 2008, Dr. Jerry D. Weast, then Superintendent of MCPS, announced the expansion of MCPS' interactive classroom technology pilot program to encompass about 65 percent of all secondary school classrooms. Dr. Weast pronounced the 21st century interactive classroom model as an important component of Phase I of the Middle School Reform initiative, which was made possible by leveraging capital budget technology funding and utilizing telecommunications expenditure rebates that are available through the e-Rate Program.

Under Maryland Code, Montgomery County is required to have its County superintendent and BoE prepare and submit to the County Executive a 6 year CIP. ² (See Appendix B for more details)

During a January 29, 2009 work session reviewing MCPS' acquisition of the 2,600 Promethean systems, County Council staff advised the Council Education Committee that MCPS had asserted that funding for the initiative would come from a combination of CIP funds allocated for FY09, reprioritization of other CIP funds in the Technology Modernization project, a request for additional CIP funding in FY11 and FY12, and e-Rate funds.³

On May 15, 2012, County Council adopted resolution 17-430 approving a special appropriation of \$1,339,200 in federal e-Rate program rebates which supplemented funding for MCPS' Technology Modernization initiative to complete payment of the lease. The total four-year lease/purchase commitment of that contract was \$13,421,600.

On September 11, 2012, the BoE approved Resolution 405-12 which authorized the acquisition of an additional 2,000 Promethean systems, under a State of Maryland Department of Information Technology (DoIT)⁴ contract, which was subsequently replaced under a Maryland Educational Enterprise Consortium (MEEC) contract in December 2012. Resolution 405-12 authorized:

² Md. Code, Education Art. § 5-306(b)

³ County Council Education Committee work session considering the FY10 Operating and Capital Budgets and amendments to the FY09-14 Capital Improvements Program

⁴ Maryland contract #050B7800023 was a DoIT cooperative master contract that allowed county, municipal, and other non-state governments or agencies to make procurements under the contract. That contract had a term of 5 years that expired on July 7, 2012 - prior to the BoE's authorization to procure the 2,000 Promethean systems.

- a) \$8,949,719 for the purchase of 2000 Promethean interactive classroom technology systems for approximately 2,000 elementary classrooms through State of Maryland Contract #050B7800023;
- b) the financing of the acquisition over a five year period (an annual lease obligation of \$1,789,879) through Dell, and resolution of payment method; and
- c) a request that the County Council approve a FY13 supplemental appropriation to expend FY13 e-Rate funds to implement the expenditure.

Analysis and Conclusions

Although MCPS did not document an analysis in selecting its technology standards, no formal documentation for selection of a standard was required.

The MCPS Chief Technology Officer (CTO) characterized Promethean systems and Dell computer products as the MCPS technology standards. MCPS' interactive classroom technology procurement process revolved around the selection of the standards. Best business practices suggest that technology standards can be beneficial. Standards can promote more efficient and cost effective procurement, improve the quality of user support, and lead to increased use as individuals experience the same product throughout an organization.

Two of the school systems the OIG interviewed, Denver Public Schools and the Fort Worth Independent School District, advised us they performed and documented evaluations prior to selecting Promethean as their standard.

The MCPS CTO asserted that his staff evaluated competing technologies before selecting Promethean, but did not identify specific steps used in the evaluation and could not provide documentation of an analysis supporting the selection. However, as noted earlier, MCPS purchases made from 2005-2008 were almost evenly divided between Smart and Promethean products. That should have provided ample opportunities to understand and compare those two product lines.

In a discussion with the OIG, a representative and reseller of SMART Technology stated that at the time MCPS was beginning to deploy interactive white boards, there were two major players marketing the technology - Promethean and SMART Technology. The representative asserted that, at that time, Promethean arguably had done more to establish an educational niche, while Smart had focused more on developing product for the business marketplace. He also stated that he had no problem with the MCPS decision to acquire Promethean rather than SMART Technology.

In the absence of documentary support, the selection of standards may appear to be arbitrary, are subject to challenges by stakeholders and competing vendors, and may even present appearances of improper financial relationships. However, we could find no requirement that selection of a

product standard be based on a formal documented analysis and we have no evidence that suggests that Promethean products are not an appropriate technology standard.

MCPS procurement actions appear to have been consistent with state laws, MCPS procurement requirements, and appropriations as proposed by the Board of Education to the County Council.

Maryland Code⁵ and MCPS *Policy DJA* require that purchases exceeding \$25,000 be subject to solicitation of bid through advertisement unless MCPS participates in a cooperative contract awarded by other public agencies or intergovernmental purchasing organizations⁶ where the lead agency conducted a public, competitive bid process.

Maryland state code allows a BoE to enter into a cooperative program with one or more County boards, other educational institutions or agencies, or Boards of county commissioners or county councils.⁷ According to the MCPS *Policy DJA, MCPS Procurement Practices and Bid Awards*, the practice of obtaining bids and quotations from vendors shall be in accordance with the *Procurement Manual*.

While Section 7 of the MCPS *Procurement Manual* calls for sealed, competitive or negotiated bids under an Invitation for Bid (IFB) or a Request for Proposal (RFP) when purchases of goods are \$25,000 or more, Section 11 allows MCPS to also enter into cooperative programs, such as the MEEC, with other jurisdictions as long as the BoE approves the award of cooperative bids for \$25,000 or more.

On June 10, 2008, the BoE approved Resolution 210-08 authorizing MCPS to acquire computers, associated hardware, and services valued at \$5 million from Dell Marketing LP (Dell⁸) through the MEEC contract 2007-12. This included 2,600 Promethean interactive whiteboard systems. The first annual lease obligation of \$3,355,400 was incorporated within the BoE's authorization. The Dell Master Lease Agreement No. 6451620, with an effective date of June 16, 2008, was signed by MCPS' Chief Operating Officer.

In lieu of conducting its own competitive bid process (a process the MCPS *Procurement Manual* approximates requiring three months to complete), MCPS elected to deploy its 2012 interactive classroom technology initiative via procurement through the MEEC cooperative, master contract UB-12-B-19-D6 through which MCPS could procure products and services. These actions were

⁵ Md. Code, Education Art. § 5-112(b)(1)

⁶ Md. Code, Education Art. § 4-123(a)

⁷ Md. Code, Education Art. § 4-123(a)

⁸ Dell Marketing LP is one of many business units that make up Dell, Inc., a global information technology company, which through its subsidiaries designs, develops, manufactures, and distributes computer systems. MCPS' purchase of products may be with a Dell unit that is different from the unit that finances the purchase. This report references the collective "Dell" when addressing one or more of its operating units.

in compliance with the requirements of the Maryland Code, MCPS *Policy DJA*, and MCPS' *Procurement Manual*.

The MEEC contract UB-12-B-19-D6 is a 2012 University System of Maryland cooperative, master contract available to Maryland educational institutions for products and services offered through Dell. The MEEC contract was awarded as the result of a competitive sealed proposal process⁹ led by the University of Baltimore between January 26, 2012 and February 28, 2012. The competitive sealed proposal process met University System of Maryland procurement requirements. The contract was effective on August 1, 2012, and runs until March 15, 2014.

MCPS issued purchase order #8199803 authorizing the first of five installments to Dell totaling \$8,949,395.85 for 2,000 Promethean interactive classroom technology systems on December 12, 2012. This action was authorized by the BoE.

Financing of the acquisition through Dell was accomplished through Lease Purchase Schedule No. 001-6451620-003 which was executed by MCPS' Chief Operating Officer on March 28, 2013. This Lease Purchase Schedule amended and extended Master Lease Agreement No. 6451620, above. This action was also authorized by the BoE.

The OIG consulted the County Attorney, Chief, Division of Finance and Procurement, who supported the OIG conclusion that MCPS observed state procurement laws and MCPS procurement requirements for the acquisition of the Promethean systems.

Information developed by the OIG indicates that prices obtained by MCPS compared favorably to the prices obtained by other school systems that purchased Promethean systems.

Promethean systems are manufactured by Promethean World, plc, a company based in Blackburn, Lancashire, England. Promethean markets its products in the United States through ten companies, three of whom - Dell, CDW-G, and Konica Minolta Business Systems - provide national, large volume sales. Although other vendors provide business solutions, system sales, and installation support services, Dell is the only Promethean licensed reseller available under the MEEC cooperative contract arrangement.

The MEEC contract establishes prices for items offered under the contract, but permits either a secondary competition using vendors available under the contract or price negotiation with those vendors. Since Dell was the only licensed reseller of Promethean products under the MEEC

⁹ The University System of Maryland Procurement Policies and Procedures Section V(C)(1) - Procurement Methods, Competitive Sealed Proposals, Request for Proposals (RFP) - employs an RFP for the solicitation of Competitive Sealed Proposals which are evaluated on the basis of factors that include but are not limited to price. Evaluation is based on the factors set forth in the request for proposals in order to determine which proposal best meets the needs of the procuring institution.

contract, MCPS could not conduct a secondary competition using the MEEC contract, but did negotiate lower prices directly with Dell for the systems it purchased.

The OIG determined that Promethean systems were available from authorized resellers other than Dell and that MCPS could have explored either direct procurement from Promethean¹⁰ or a competition between vendors through other cooperative, master procurement contracts, such as the Pennsylvania Education Purchasing Program for Microcomputers (PEPPM).

Fairfax County, VA Public Schools accessed a Dell competitor, CDW-G through two cooperative purchasing contracts methods – one with Association of Educational Purchasing Agencies (AEPA) and the other with the Charlotte (North Carolina) Cooperative Purchasing Alliance (CCPA), whose representative advised OIG staff that MCPS would qualify for the no fee cooperative.

MCPS determined that the price they negotiated with Dell was very good and that they would obtain no better price by conducting a costly and time consuming competition. The OIG obtained pricing from various sources, including some school systems we identified as having acquired Promethean systems. The OIG prepared a table showing the comparison of MCPS-Dell negotiated pricing to web-based pricing it obtained from the US based services Dell Online, Logical Choice, PEPPM, MEEC, and the United Kingdom¹¹ based Misco (Appendix C).

The MCPS-Dell agreement provides prices below the lowest prices identified among this group of providers. For example, the price for the MCPS ActivBoard 587 Pro Fixed DLP procured through the MCPS Dell Agreement was approximately 33% less than the cost in the PEPPM quote and approximately 40% cheaper than the Dell Online quote. The prices noted in these comparisons are available for purchases of as few as a single unit rather than large volume purchases, such as were made by MCPS.

The OIG also located pricing for systems in links to the Aurora and Denver Colorado public schools procurement catalogs for Promethean products.¹² The MCPS-Dell agreement provided lower prices than were obtained by those school systems for each item purchased. However, neither of these school systems made purchases of as large a number of systems as were made by MCPS.

The OIG contacted a national representative of Promethean and subsequently identified school systems that have made purchases similar in scale to those made by MCPS. We were able to contact and obtain information from one of those, the Fort Worth Independent School District

¹⁰ The Pennsylvania Education Purchasing Program for Microcomputers (PEPPM) entered in to a direct procurement contract with Promethean World, plc. MCPS' use of the PEPPM cooperative purchasing agreement would have provided an opportunity to negotiate price directly with Promethean, but would have required MCPS to secure alternative financing arrangements.

¹¹ For UK based costs, the British Pound price was converted to US dollars. On February 13, 2013, the rate was 1.5519.

¹² The Denver Colorado Public Schools report an enrollment of 78,339 (54% the size of MCPS), and the Aurora Colorado Public Schools report an enrollment of 38,605 (¼ the size of MCPS). Source: 2010-2011 AS&U 200 Largest School Districts by Enrollment.

(FWISD) which is about one-half the size of MCPS. FWISD made a multi-unit (3,353 units) Promethean purchase similar in size to the MCPS procurement. The OIG interviewed the Director, Strategic Operation for the FWISD who explained that they acquired the Promethean systems during a district-wide modernization program, funded by a voter-approved bond program, between August 2008 and December 2009. FWISD acquired the Promethean units through a State of Texas cooperative program. The Director advised us that the Texas cooperative program conducted a secondary competition among its vendors. FWISD expended \$24.2 million for the initiative, including installation.

MCPS' cost of the 4,600 Promethean systems, excluding installation, was approximately \$22 million. While the size and timing of the Promethean acquisitions were not identical to the MCPS procurement, comparison of prices paid by FWISD for the same units purchased by MCPS during the same period show that MCPS paid \$3,295 in 2008 and \$3,395 in 2009 per unit, while FWISD paid \$3,304 per unit. It should be noted that FWISD obtained bond financing to acquire their units while MCPS acquisitions were made through a multi-year lease with the vendor (Dell). While not specifically identified in the Dell lease, financing costs are logically factored into unit prices obtained by MCPS.

Based on the price comparisons and other information we were able to obtain, we determined that MCPS obtained reasonable prices for the products purchased. We found no evidence to indicate that MCPS might have been able to obtain better pricing by using a different contract vehicle and conducting a secondary competition.

Summary of Chief Operating Officer's Response

The Chief Operating Officer's response to the final draft report is included in its entirety in Appendix D.

The response indicated agreement with our analysis and conclusions that:

- MCPS procurements actions were consistent with state laws and MCPS procurement requirements;
- MCPS used appropriated funds as proposed, and;
- MCPS received favorable and competitive pricing for the Promethean systems.

The response also states that the lack of formal documentation of how the technology standard was selected should not diminish the efforts MCPS made in accessing technology products of Promethean and its competitors. However, he agreed that documenting MCPS' decisions is valuable.

Appendix A: Scope and Methodology

Our review was conducted between November 15, 2012 and August 1, 2013 in accordance with the Council of the Inspectors General on Integrity and Efficiency *Quality Standards for Inspection and Evaluation*. The review was temporarily suspended from May, 2013, through September, 2013 to complete other audit priorities.

Our review covered the period June 2005 through August 2013.

The scope of our review included all appropriation and procurement activity related to the 2,000 Promethean interactive white boards authorized by the Montgomery County Public Schools Board of Education on September 11, 2012. Because of a shared leasing contract and similarity of acquisition, we expanded our scope to include appropriation and procurement activity related to the 2,600 Promethean interactive white boards authorized by the Montgomery County Public Schools Board of Education on June 10 (procurement) and June 23 (lease), 2008. Although we did not find schools with similar enrollments, we did find one with the technology upgrade program and Promethean purchases comparable in scope to MCPS. We compared the Promethean unit price and contracting methods from several schools.

We identified 2,393 interactive classroom technology systems that had not been procured through the two leasing arrangements. These were excluded from the scope of our review other than to ensure capital improvement program funding for technology modification had been appropriated and exceeded the value of the systems acquired for each year during which systems had been procured. We reviewed all business case related material that was presented in support of MCPS' commitment to Promethean as its interactive classroom technology system standard.

Our review methodology included:

- A review of the Maryland Code relative to Board of Education authorities, operating and capital budgeting, and procurement requirements,
- A review of the Montgomery County Charter and Montgomery County Code relative to any applicable MCPS operating and capital budgeting, and procurement requirements,
- A review of MCPS Board of Education meeting minutes, resolutions, budget authorizations, and procurement approvals,
- A review of memoranda prepared by MCPS Superintendents Jerry D. Weast and Joshua P. Starr briefing the Board of Education on technology initiatives,
- A review of cooperative procurement programs, affiliated vendors, and pricing sheets for:
 - Maryland Department of Information Technology (DoIT)
 - Maryland Educational Enterprise Consortium (MEEC)
 - Pennsylvania Education Purchasing Program for Microcomputers (PEPPM)
 - Association of Educational Purchasing Agencies (AEPA) (via Keystone Purchasing Network)
 - Charlotte Cooperative Purchasing Alliance (CCPA).
 - United States General Services Administration (GSA),

- A review of County Council Resolutions and work session Staff analyst packets related to annual operating and capital budget approval and appropriations, bi-annual capital improvement program approval, and special appropriation relating to MCPS' technology modernization initiative, individual school modernization and renovation projects, and the middle school reform initiative,
- A review of MCPS fixed asset and system inventory reports for interactive white board systems,
- Interviews with MCPS staff,
- Interviews with CDW-G, Konica-Minolta Business Systems, Promethean and SMART Technology representatives,
- Interviews with representatives from Fairfax County Public Schools ,Denver Public Schools, and Fort Worth Independent School District,
- An interview with the University of Baltimore bid and contract administrator for MEEC contract UB-12-B-19, and
- Interviews with representatives from the Office of the County Attorney, the Montgomery County Management & Budget Office, and the County Council staff analyst assigned to Montgomery County Public Schools.

Appendix B: Appropriation Authorities

Under Maryland Code, Education Articles, Montgomery County is required to have its County superintendent and BoE prepare and submit to the County Executive a 6-year CIP capital improvements program.¹³

The CIP provides an estimate of cost and a statement of all funding sources¹⁴ for all of the BoE's anticipated capital projects and programs, including substantial improvements and extensions of projects previously authorized¹⁵.

After recommending any revisions and modifications, the County Executive submits the CIP for adoption¹⁶ by the County Council (subject to amendments, revisions, and modifications the County Council may make).¹⁷

The Maryland Code additionally requires that the BoE prepare an annual budget that provides current expense fund requested appropriations for capital outlays, and School Construction Fund requested appropriations equipment that will be an integral part of a building by project and additional equipment by project.¹⁸

¹³ Md. Code, Education Art. § 5-306(b)

¹⁴ Md. Code, Education Art. § 5-306(c)(3)

¹⁵ Md. Code, Education Art. § 5-306(c)(4)

¹⁶ Md. Code, Education Art. § 5-306(d)

¹⁷ Md. Code, Education Art. § 5-306(e)

¹⁸ Md. Code, Education Art. § 5-101

Appendix C: Comparison Pricing

The following is a comparison of the MCPS provided School Catalog, and WEB-Based Promethean System Component Pricing:

Item	MSRP	MEEC Contract	MCPS Dell Agreement	Historic MCPS Invoice	PEPPM Quote	Dell Online	Misco UK	Logical Choice	Denver PS	Aurora PS
ActivBoard 587 Pro - Fixed DLP	5,999	4,549	2,814	2,813	4,199	4,550	5,230	3,499		
ActivBoard 587 Pro - Adjustable DLP	7,139	4,999	3,339		4,997	4,999	5,616	5,699	4,499	
ActivVote 32	2,569	1,900	939	939	1,798	1,899			1,349	1,349
ActivExpression 32	3,999	2,940	1,583	2,199	2,799	2,940	2,270	2,799	2,239	1,600
ActivSlate 60	429	340	139	149	300	340	304	299		255
Activewand 50	109	101	19	67	76	101	69			69
ActivView 322	799	680	379		559	600				
ActivEngage LICs	36	32	22		25			22		
ActivBoard 378 Pro - Fixed DLP					3,401					2,061
ActivBoard 378 Pro - Adjustable LCD				3,200	4,199				3,779	3,779

Appendix D: MCPS Chief Operating Officer's Response



MONTGOMERY COUNTY PUBLIC SCHOOLS
MARYLAND
www.montgomeryschoolsmd.org

November 20, 2013



Mr. Edward L. Blansitt III
Inspector General
Office of the Inspector General
Montgomery County Government
51 Monroe Street, Suite 802
Rockville, Maryland 20850

Dear Mr. Blansitt:

This is in response to your October 30, 2013, letter regarding the Final Draft Report of Inquire of Montgomery County Public Schools (MCPS) Acquisition of Promethean Interactive Classroom Technology Systems.

We appreciate that the report accurately acknowledges that MCPS procurement actions were consistent with and in compliance with both the letter and spirit of state laws and MCPS procurement requirements. This finding also is consistent with the Maryland State Board of Education's August 28, 2013, decision that denied an appellant's challenge to the procurement action and affirmed the MCPS Board of Education's decision and action on the acquisition of the Promethean interactive technologies. Moreover, we are appreciative that the report also illustrates that MCPS not only used appropriated funds as proposed, but also received very favorable and competitive pricing for the interactive whiteboard technologies purchased.

In noting that MCPS did not maintain formal documentation of the comparative strengths and suitability of the Promethean products over its competitors, we do not believe that this should diminish the significant efforts that were made to assess Promethean's and its competitors' products. Nonetheless, this a good reminder of the value of capturing and retaining this type of documentation.

Again, we appreciate your diligence and thoroughness in completing this review and also in the professional manner with which you executed the process. If you have any questions, please contact me at 301-279-3626.

Sincerely,

Larry A. Bowers
Chief Operating Officer

LAB:sjk

Copy to:

Dr. Starr Dr. Zuckerman Mr. Collette Mr. Morgan

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