



Quality Assurance and Compliance Monitoring

Adult Education and Family Literacy

Miami Dade College

Final Report
March 7, 2011

FLORIDA DEPARTMENT OF EDUCATION



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March 4, 2011

Dr. Eduardo J. Padron, President
Miami Dade College
300 Northeast Second Avenue
Miami, Florida 33132-3316

Dear Dr. Padron:

We are pleased to provide you with the Final Report of Monitoring of the Adult Education and Family Literacy programs from our visit on December 8-10, 2010. The report will also be placed on our website at <http://www.fldoe.org/workforce/compliance.asp>.

We appreciate the leadership and professionalism demonstrated by your staff during the review process. If we can be of any assistance, please contact Eileen L. Amy, Director of Quality Assurance and Compliance. Ms. Amy may be reached at 850/245-9033, or via electronic mail at Eileen.Amy@fldoe.org.

Thank you for your continuing commitment to improve services for Florida's students.

Sincerely,

Loretta Costin

LBC/ela

Enclosure

CC: Susan Dow
Eileen L. Amy
Shahrokh Massoudi

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Florida Department of Education
Division of Career and Adult Education

Miami Dade College
Adult Education and Family Literacy
Quality Assurance Monitoring Report

I. INTRODUCTION

The Florida Department of Education (FDOE), Division of Career and Adult Education (Division), in carrying out its roles of co-leadership, resource allocation, technical assistance, monitoring and evaluation, is required to oversee the performance and regulatory compliance of recipients of federal and state funding. The Quality Assurance section of the Bureau of Grants Administration and Compliance (Bureau) is responsible for the design, development, implementation and evaluation of a comprehensive system of quality assurance including monitoring. The role of the Quality Assurance System is to assure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is incumbent upon the Division to monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

II. AUTHORITY

The Florida Department of Education receives federal funding from the U.S. Department of Education for Adult Education and Family Literacy under the Adult Education and Family Literacy Act of 1998. FDOE awards sub grants to eligible providers to administer local programs. FDOE must monitor providers to ensure compliance with federal requirements, including Florida's approved state plan for Adult Education. Each State shall have procedures for reviewing and approving applications for sub grants and amendments to those applications, for providing technical assistance, for evaluating projects, and for performing other administrative responsibilities the State has determined necessary to ensure compliance with applicable statutes and regulations (34 CFR 76.770). The Florida Department of Education, Division of Career and Adult Education is required to oversee the performance of community district boards of trustees in the enforcement of all laws and rules (Sections 1001.03(8) and 1008.32, Florida Statutes (F.S.)).

Additional cites noting authority to monitor and pertinent laws and regulations are located in the 2010-11 *Quality Assurance Policies, Procedures, and Protocols*, Module A, Section 1.

III. QUALITY ASSURANCE POLICIES, PROCEDURES, AND PROTOCOLS

The draft *Quality Assurance Policies, Procedures, and Protocols* (Manual) was provided to agencies during September 2010 prior to the monitoring visit. The Manual provides a summary of each facet of the monitoring design and the process. It also contains protocols that may be used as agencies monitored or reviewed. References may be made to the Manual in this document; it is located on the Division's website at <http://www.fldoe.org/workforce/compliance.asp>.

IV. PROVIDER SELECTION

Various sources of data used throughout the implementation of the Quality Assurance System. The monitoring component of the system is risk-based.

Risk Assessment is a process used to evaluate variables associated with the grants and assign a rating for the level of risk to the Florida Department of Education and the Division of Career and Adult Education. A Risk Matrix, identifying certain operational risk factors, is completed for each provider. The Risk Matrix is located in Appendix A. The results of the Risk Assessment process and consideration of available resources are used to determine one or more appropriate monitoring strategy(ies) to be implemented.

The monitoring strategy for Miami Dade College (MDC) was determined to be an on-site visit. Notification was sent to Dr. Eduardo J. Padron, MDC President on July 28, 2010. The designated representative for the agency was Ms. Susan Dow, Director, Adult Education Program.

The on-site visit to the agency was conducted on December 8-10, 2010, by four representatives of the Quality Assurance Section of the Division: Ms. Eileen L. Amy, Director of Quality Assurance and Compliance and Program Specialists, Tashi Williams, Sheryl Walden, and Dr. Shahrokh Massoudi.

V. MIAMI DADE COLLEGE

The Adult Education program at MDC provides English language skills, adult basic education, and GED preparation for students who need to further their education at the postsecondary level. The program is student-centered with flexibility of locations and schedules. Adult Education programs are offered at the following locations: North Campus, Wolfson Campus, Kendall Campus, InterAmerican Campus, Homestead Campus, Hialeah Campus (ESOL only) and several outreach community sites in Dade County.

According to the college 2008-09 NRS Report, MDC reported 15,202 Adult Education student enrollments, with 892 enrolled in Adult Secondary Education (ASE), 5,973 enrolled in Adult Basic Education (ABE), and 8,337 enrolled in English for Speakers of Other Languages (ESOL).

The provider was awarded the following grants for FY 2008-09 and 2009-10:

2008-09 ADULT EDUCATION GRANTS

<u>Grant Number</u>	<u>Type</u>	<u>Total</u>	<u>Unexpended Funds</u>
132-1919A-9CG01	Adult General Education	\$1,458,920	\$ 5,807.01
132-1919A-9CH02	Literacy for Households	\$ 150,000	\$ 2,197.67
130-1919A-9CH03	Literacy for Households	\$ 150,000	\$ 3,366.77
130-1919A-9CH04	Literacy for Households	\$ 150,000	\$ 2,075.03

2009-10 ADULT EDUCATION GRANTS

<u>Grant Number</u>	<u>Type</u>	<u>Total</u>	<u>Unexpended Funds</u>
132-1910A-0CG01	Adult General Education	\$987,117	\$13,168.86
132-1930A-0CE01	EL/Civics	\$250,000	\$ 0

Additional information about the provider may be found at the following web address:

<http://www.mdc.edu>.

VI. MONITORING ACTIVITIES

The monitoring activities included pre-visit planning conference calls, entrance conference, interviews with administrators, teachers, and students, observations, record reviews, and an exit conference.

On-site Visits

Members of the team made on-site visits to Adult Education and family literacy programs at the following locations:

- Wolfson Campus
- Kendall Campus
- North Campus
- Amigos for Kids
- Charles Hadley Elementary School
- Savvy Parents Inc.

Entrance Conference

The entrance conference for MDC was conducted on December 8, 2010, and included:

Dr. Rolando Montoya, Provost; Susan Dow, Director of Adult Education Program; Margaret Mannchen, Associate Director of Institutional Research Operations; Silvia Vallin, Program Leader at InterAmerican Campus; Coral Horton, Program Manager; Christina Chu, Assistant Comptroller; Gregory Knott, Associate Vice Provost for Business Affairs; Geoffrey Gathercole, Community Education School Director; Merrill Irving Jr., Community Education Chair; and FDOE staff Eileen L. Amy, Tashi Williams, Sheryl Walden, and Dr. Shahrokh Massoudi.

Interviews/Observations

Interviews were conducted with the administrative staff, instructional staff, and students. Ten persons were interviewed and ten observations were conducted. All interviews and observations were held during the course of the visit.

Records Review

Program, financial, and administrative records were reviewed. A complete list is provided in Section VIII, G. Some policies and procedures were reviewed at the agency's website and discussed during the on-site visit.

Exit Conference

The exit conference for MDC was conducted by phone on January 19, 2011, and included the MDC staff: Dr. Lourdes Oroza, Kendall Campus President; Susan Dow, Director of Adult Education Program; Christina Chu, Assistant Comptroller; Geoffrey Gathercole, Community Education School Director; and FDOE staff Ms. Eileen L. Amy and Dr. Shahrokh Massoudi.

VII. RESULTS

Miami Dade College
December 8-10, 2010

A. ADMINISTRATION refers to the management and/or supervision of programs, grant oversight, access and equity and other administrative areas.

- The College's Adult Education program is organizationally a part of the School of Community Education.
- The Community Education Chairperson at each campus is responsible for the administration of Adult Education programs.
- 65% of MDC Adult Education students are enrolled in ESOL, 35% are enrolled in ABE/GED.
- Instructors participated in math and reading training.
- An ELITE training conference sponsored by the school district was also attended by some of the instructors.
- Ongoing tutor training is available for tutors.
- Instructors participate in ESOL training.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

Concern: Staff development opportunities are very limited for part-time instructors

Recommendation: Consider ways to increase training opportunities for the part-time instructors.

Agency Response: Region V provides numerous professional development opportunities, but part-time instructors rarely participate because there is insufficient funding to pay them. The Adult Education Director also provides two to three workshops per year on relevant topics such as Career Pathways, Using Data to Improve Programs, and Transitioning Adult Ed Students to Postsecondary.

B. DATA refers to all the components of the data system, including data collection, entry and reporting. The use of data in program decision-making is also explored and commented upon.

- The Odyssey System is used by instructors to enter students' attendance and grades.
- MDC is sponsoring a consortium project to enhance Adult Education data functionality and develop on-demand reports.
 - Higher Education Technology Group (HET Group) is a consortium of seven (7) Florida colleges and two (2) out-of-state members.
 - HET Group will create a non-credit placement process, address reporting concerns, change TABE input and report LCPs.
 - Create a placement roster or report that can be easily accessed via Web, on demand.
- The District Office of Institutional Research (IR) captures data periodically and prepares reports upon request.
- The Executive Information System (EIS) shows daily enrollment totals down to the level of campus department.
- IR prepares reports for Adult Education administrators, staff, or instructors upon request for grant reporting and internal monitoring.
- According to 2008-09 National Reporting System (NRS) data, the College ESOL intermediate high completion percentage is above the average statewide rate for colleges; however, the College ABE is lower than the average statewide college rate. The 2009-10 NRS data reflect the programming changes made by IR and show MDC's overall completion rate to be more than 10 percentage points above the average statewide college rate.
- Teachers get test results; keep records from TABE results, written in scale scores; get printouts from CASAS results; review results; make program decisions based on data.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

Concern: 2008-09 data processes lack the ability to report certain specified data to inform the NRS required elements including accurate calculation of EL/Civics EFLs, and multiple student goals.

Agency Response: Programming changes have been implemented in 2009-10 and all EFLs can now be captured resulting in the 10 point advantage referenced above. However, MDC'S Table 4C for 2009-10 severely underreports the number of students working and earning GEDs online, but the same appears to be true for the community college system in general.

Recommendation: College needs to continue its development of data processes to report Adult Education data.

Input provided by college for data collection:

In Program Year 2008-09, NRS reporting became the sole reporting mechanism for performance measures of AGE grants. We observed that MDC's NRS Table 4 did not seem to accurately reflect the numbers we believed we were achieving in students outcomes. Since we are very confident in the accuracy and completeness of our enrollment data and test scores housed in college's mainframe, we alerted our Institutional Research Department and requested that they review their methodology to ensure that outcomes were correctly calculated. Programming changes were made. We now believe that our LCP and EFL counts are correct with one exception. Students enrolling in EL/Civics are still being awarded multiple LCP's for subsequent enrollments in the Citizenship class. This problem is being fixed.

EFL counts are now accurate with the exception of EL Civics, which does not have a pre/post test. The issue of duplication of EFLs for EL Civics is being addressed and will be resolved by the next reporting period.

We do not have the ability to record individual student goals in our mainframe database and are therefore not getting credit for GED diplomas or transitions to postsecondary. We now understand

that in the future goals will be set by default for the NRS report, making it unnecessary for us to develop this capacity.

C. CURRICULUM AND INSTRUCTION refers to those elements which contribute to student learning and skill acquisition. It also addresses student and instructor observations.

- Instructors are following ESOL curriculum.
- College provides unlimited lab time for students who need further instruction.
- Computer labs are utilized during campus hours and are also accessible from home.
- Math and writing is a major focus of ABE classes.
- Instructors frequently use examples of real-life experiences.
- ESOL programs continue using levels 1, 2 and 3; levels 4, 5 and 6 were replaced with ELCATE A, B and C. This change enables students to better transition to ABE, GED or CTE classes. High Advanced (Level 7) serves as a bridge-to-college course.
- The College uses the Florida Choices to encourage students' goal-setting.
- ESOL schedules vary by campus and include both classroom instruction and lab time.
- Students who earn a GED and attend the graduation ceremony receive a 3-credit tuition waiver from the College.
- Students are prepared for College Placement Test (CPT) while they await GED test results.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

None

D. TECHNOLOGY AND EQUIPMENT refers to a review of the technology and equipment used by students and teachers in the classroom; addresses access, availability, innovation, use and condition.

- Equipment technology is sufficient and current.
- Use of technology for student learning is visible.
- The College has a comprehensive annual equipment inventory system.
- All computers are tagged, regardless of cost.
- No computers were allowed in the classrooms; students use the lab on the campus.

FINDINGS

No findings of non-compliance were noted.

CONCERNS AND RECOMMENDATIONS

Concern: There is a lack of technology at the off-campus sites. Computers at the Savvy Parents Inc. outreach center need repair or replacement. No technology was observed at the Charles Hadley Elementary School Adult Education program.

Recommendation: MDC needs to conduct a review of the existing technology at their outreach centers and prepare a plan of action for use, repair or replacement. Use of additional technology may enhance student learning.

E. LEARNING ENVIRONMENT encompasses all aspects of the physical environment where classes are held. Describing the learning environment may also attempt to capture the vision, philosophy, and character that is observed on the campus or in the classroom.

- Buildings and Classrooms are clean; however, some classrooms and offices were very cold. on the North Campus, requiring individuals to wear coats inside.
- Students and teachers were enthusiastic about the ESOL programs.
- Child care is provided onsite at Savvy parents, Inc. and Charles Hadley Elementary while parents attend the classes.
- No computers were allowed in the classrooms, student use the lab on the campus.

- Depiction of students' accomplishments was evident in posters located throughout the campus such as the Wall of Fame.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

Concerns: Although during the visit the temperatures were abnormally cold, on the North Campus some classrooms and offices were very cold requiring individuals to wear coats.

Recommendation: Review the availability of heating during periods of cold weather to enable individuals to learn and/or work in a comfortable environment.

F. ACCESS AND EQUITY refers to compliance with the requirements of federal non-discrimination laws relating to recruitment, enrollment, participation, and completion of programs.

- Instructors and administrators are aware of the process for addressing complaints of discrimination.
- The College has Access Disability Services offices on four of its campuses and provides services on all of them.
- Students with disabilities are provided access to services.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

Concern: Non-discrimination statements were not broadly posted on bulletin boards, in classrooms or common areas; statements were not found in the college's publications throughout the sites visited.

Recommendation: Review postings and publications to insure that non-discrimination statements are posted and/or included.

G. RECORDS REVIEW refers to a review of the records and documents that evidence compliance with federal and state rules and regulations. Both financial and programmatic records reviewed.

The following records were reviewed:

- Transition Specialist, part-time tutor, and Student Service Specialist job descriptions and responsibilities
- GED Intake Form
- ABE/GED Student Contract
- ABE/GED Student Attendance Policy
- Electronic and paper student records
- Student Success Plan / Individual Education Plan
- Program brochures for Adult Education programs in English and Spanish
- Certification of Accomplishment for Completion of Non-Credit Program Adult ESOL
- Financial Policies and Procedures
- College policies
- Property Management Annual Inventory notification
- Written agreements for services with partners

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

Concern: Forms used from campus to campus are not consistent such as the IEP versus the Student Success Plan.

Recommendation: Complete a review of forms to insure that they are current and consistent across campuses for similar processes.

H. FINANCIAL refers to aspects of the federal fiscal requirements that providers must meet when expending federal funds, including a financial management system, a procurement system, and an inventory management system.

- All financial protocols were completed and submitted. The Assistant Comptroller was fully prepared; the review was comprehensive and complete; all areas were addressed, and documentation was readily available for review.
- The Business Affairs office for all campuses was located on the Kendall Campus.
 - Restructuring of the accounting management functions was centralized to address all finance matters for post-award grant matters.
 - Pre-award functions are centralized (through College's Resource Development Office) to facilitate the submission of grant applications.
 - Coordination with different campuses was evident.
- Policies and procedures are available on the website.
 - The financial personnel utilize all federal compliance documents including CFRs, EDGAR, OMB Circulars A-21, A-110 and A-133 in addition to the Green Book. An accounting manual is available for all processes
- Once the award letter is received, it goes to the Board and then to processing:
 - set up account, budget must match with narrative;
 - changes are made only after amendment approval;
 - object codes and chart of accounts are established; and
 - personnel are hired.
- Purchasing and procurement procedures are followed; inventories and documentation of purchases were available.
 - Inventory threshold is \$1000; all computers are tagged, regardless of cost
- Personnel:
 - requisition form used to add staff;
 - all staff sign bi-weekly payroll (separate timesheet for work other than grant);
 - supervisors review and sign timesheets;
 - timesheets provide support for time and effort; and
 - all supervisors are required to review and validate time and effort.
- Although travel was limited, the documentation was reviewed and complete.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

1. Concern: In reviewing the timesheets for the North Campus, numerous entries were crossed out or changed with the use of white out; it is unclear who made the changes and if the employee signatures or supervisor signatures/approvals were completed before or after the changes.

Recommendation: Review with employees and supervisors the appropriate way to make corrections; provide evidence of the review/training.

2. Concern: At the North Campus, staff purchased three boom boxes using petty cash. Petty cash purchases may not exceed \$100.00 according to the agency's policy. One person purchased one item and another person purchased two (2) of the items on two (2) separate transactions. The method of purchasing the items clearly circumvented the petty cash policy and is not allowed.

Recommendation: Review with employees the correct implementation of petty cash purchases; provide evidence of training/review.

Note: Financial staff was informed of the two concerns prior to the end of the visit.

I. COLLABORATION refers to the collaborative agreements, partnerships, or memoranda of understanding to benefit an agency's programs and students.

- The College has collaborative agreements with Miami Dade County Public Schools (MDCPS).
- Collaborative agreements are in place with CBO's for 18 outreach centers.
- Partnership agreements for services are updated annually.
- A College/Vocational Transition Fair is available for MDC and MDCPS students.
- There is collaboration with MDCPS in transitioning their Adult Education students to MDC and MDC students to MDCPS vocational programs.

FINDINGS

No findings of non-compliance were noted.

CONCERNS AND RECOMMENDATIONS

None

VIII. REQUIRED RESOLUTION ACTIVITIES

Action Plan – The Miami Dade College must provide an Action Plan to address the concerns noted in the focus areas of Administration, Data, Access and Equity, Technology and Equipment, Learning Environment, and Finance.

IX. TARGETED TECHNICAL ASSISTANCE

Targeted technical assistance may be provided to support full compliance and systemic change for program improvement. There has been consultation with division program staff regarding specific technical assistance needs. Staff is encouraged to contact Division staff to assist their efforts toward systemic change.

X. REMARKS

Visiting FDOE staff appreciated the comprehensive program overview provided during the entrance conference. During the exit conference FDOE acknowledged, and College representatives agreed, that the length of the visit did not allow monitors to spend a sufficient amount of time on the campuses. FDOE expects to return to Miami Dade College during the 2011-12 monitoring year.

XI. SUMMARY

Once the field work, including receipt of requested information is completed, a draft report is forwarded to the provider for review. Comments are accepted and considered. The final report is completed and forwarded to the Agency Head with a copy to the appropriate parties. The Bureau's site visit co-leader monitors and conducts follow-up activities to assure issues have been satisfactorily completed within the stated timelines. Finally, the Bureau issues a Closure Notice to the Agency Head and designated contact person. This notice indicates all outstanding items have been completed.

We want to extend our appreciation to all participants in the MDC's on-site monitoring visit. Special thanks to Susan Dow and Raul Angel for their participation and leadership in this process.

Appendix A
Miami Dade College
Risk Matrix for Adult Education

Risk Factor	Criteria Scale	Value (V)	Risk Factor Weight	Total Points
Total amount of agency funding from grants (2008-09)	\$ 2,000,001+	8	6	36
	700,001 - 2 million	6		
	300,001 - 700,000	5		
	< 300,000	4		
Number of grants per agency (2008-09)	Number of grants (4)	2	6	48
Number of grants with 10% or more of unexpended funds (2008-09)	Number of grants (4)	5	4	0
Audit findings relevant to internal control weaknesses during three (3) previous years for targeted agency.	16 + findings	10	10	100
	11-15 findings	8		
	5-10 findings	6		
	1-4 findings	4		
Key organizational change within the last two (2) years.	Director (0) Yes = 1 No = 0	10	4	0
TOTAL Level of Risk Score				184

APPENDIX B
Miami Dade College
Resolution Plans

☒ Adult Education
☒ Action Plan

☒ Corrective Action Plan

	Strategies	Person Responsible	Projected Date of Completion
CORRECTIVE ACTION PLAN Citation/Finding(s): We did not find statements of non-discrimination to be broadly posted so they were visible to students, staff, or the visitors to the College. <u>Statutory Authority:</u> Title VI of the Civil Rights Act of 1964 [PL. 88-352]; Title IX of the Education [20 U.S.C. 1681-1683 and 1685-1686], Section 504 of the Rehabilitative Act of 1973, as amended [29 U.S.C. 794 [42 U.S.C. 6101-6107].			
ACTION PLAN Concerns: Staff development opportunities are very limited for part-time instructors. Current data processes lack the ability to report specified data to inform the NRS required elements including the calculation of EFLs and student goals. Lack of technology at the off-campus sites. Computers at the Savvy Parents Inc. outreach center need repair or replacement. No technology was observed at Charles Hadley Elementary School Adult Education			

<p>program.</p> <p>Although during the visit the temperatures were abnormally cold, on the North Campus some classrooms and offices were very cold requiring individuals to wear coats.</p> <p>In reviewing the timesheets for the North Campus, numerous entries were crossed out or changed with the use of white out; it is unclear who made the changes and if the employee signatures or supervisor signatures/approvals were completed before or after changes.</p> <p>At the North Campus, staff purchased three boom boxes using petty cash. Petty cash purchases may not exceed \$100.00 according to the agency's policy. One person purchased one item and another person purchased 2 of the items on 2 separate transactions. The method of purchasing the items clearly circumvented the petty cash policy and is not allowed.</p>			
<p>Technical Assistance Needed and/or Provided:</p>			
<p>Date and Status of Action:</p>			
<p>Plan submitted by: _____ Date: _____</p>			
<p>Plan accepted by: _____ Date: _____</p>			