

AUDIT REPORT

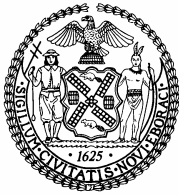


CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
BUREAU OF MANAGEMENT AUDIT
WILLIAM C. THOMPSON, JR., COMPTROLLER

Follow-up Audit Report on the Operating Practices of the City University of New York College Discovery Program

ME08-059F

June 30, 2008



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
1 CENTRE STREET
NEW YORK, N.Y. 10007-2341

WILLIAM C. THOMPSON, JR.
COMPTROLLER

To the Citizens of the City of New York

Ladies and Gentlemen:

In accordance with the responsibilities of the Comptroller contained in Chapter 5, § 93, of the New York City Charter, my office has conducted an audit to determine whether the City University of New York (CUNY) implemented the eleven recommendations made in the Audit Report on the Operating Practices of the City University of New York College Discovery Program (MD02-067A), issued on February 2, 2003.

CUNY's College Discovery Program (CDP) was created in 1964 as a special program for educationally and economically disadvantaged students who otherwise might not be able to attend college. CDP provides academic and financial support to students through specialized counseling, tutorial services, remedial instruction, and payments for book expenses at the six community colleges. We audit programs such as this to ensure that City agencies efficiently and effectively meet their program objectives.

The results of our audit, which are presented in this report, have been discussed with CUNY officials and their comments have been considered in preparing this report. Their complete written response is attached to this report.

I trust that this report contains information that is of interest to you. If you have any questions concerning this report, please e-mail my audit bureau at audit@Comptroller.nyc.gov or telephone my office at 212-669-3747.

Very truly yours,

A handwritten signature in cursive script that reads "William C. Thompson, Jr.".

William C. Thompson, Jr.
WCT/ec

Report: ME08-059F
Filed: June 30, 2008

Table of Contents

AUDIT REPORT IN BRIEF 1

 Audit Findings and Conclusions..... 1

 Audit Recommendations..... 2

 CUNY Response..... 2

INTRODUCTION..... 3

 Background..... 3

 Objective..... 3

 Scope and Methodology 4

 Discussion of Audit Results..... 5

 Previous Finding: “Lack of Measurable Objectives to Evaluate Program Effectiveness and Student Progress” 7

 Previous Finding: “Students Do Not Fully Use Counseling Services” 8

 Previous Finding: “Students Do Not Fully Use Tutoring Services”..... 11

 Previous Finding: “‘At Risk’ Students Do Not Fully Use CDP Services”..... 14

 Previous Finding: “Counselors Do Not Adequately Monitor Student Progress” 18

RECOMMENDATIONS..... 19

 Discussion of CUNY Response..... 21

ADDENDUM CUNY Response

*The City of New York
Office of the Comptroller
Bureau of Management Audit*

**Follow-up Audit Report on the
Operating Practices of the
City University of New York
College Discovery Program**

ME08-059F

AUDIT REPORT IN BRIEF

This audit determined whether the City University of New York (CUNY) implemented the eleven recommendations made in the *Audit Report on the Operating Practices of the City University of New York College Discovery Program* (MD02-067A), issued on February 2, 2003. CUNY's College Discovery Program (CDP) was created in 1964 as a special program for educationally and economically disadvantaged students who otherwise might not be able to attend college. CDP provides academic and financial support to students through specialized counseling, tutorial services, remedial instruction, and payments for book expenses at the six community colleges.

The previous audit report concluded that there was no comprehensive process to measure and report on the effectiveness of the six community college CDPs. In addition, the audit found that students did not fully use CDP counseling and tutoring services at two sampled schools and that counselors at the colleges did not monitor student progress adequately.

Audit Findings and Conclusions

Of the 11 recommendations made in the previous audit, CUNY implemented one, partially implemented another, and did not implement nine.

CUNY's Office of Institutional Research and Assessment (OIRA) now prepares many informative tables relating to the performance of the community college CDPs. These tables provide a comprehensive picture of students' academic progress, including their retention rates, Grade Point Averages (GPAs), credit accumulation, and graduation rates. The tables allow for comparisons of CDP student performance at each of the six community colleges and between CDP students and non-CDP students.

However, CDPs continue to have limited success in ensuring that their students take advantage of counseling and tutoring services provided by the program. Twenty-six (41%) of

the 63 sampled students who registered for the Fall 2006 semester did not receive the required number of counseling sessions during the semester, and 43 (68%) of the 63 sampled students who registered during the Spring 2007 semester did not receive the required number of counseling sessions during the semester. Concerning tutoring, 50 (79%) of the 63 sampled students who registered for the Fall 2006 semester did not receive tutoring services during the semester and 57 (90%) of the 63 sampled students who registered for the Spring 2007 semester did not receive tutoring services during the semester. Furthermore, CDPs often fell short when it came to providing counseling and tutoring services to students who were “at risk” of failing.

This follow-up audit concluded that CDPs could benefit from the establishment of minimum CUNY counseling and tutoring standards that would provide guidance to the CDPs and better enable CUNY to monitor their performance.

Audit Recommendations

To address the issues that still exist, we recommend that CUNY:

- Ensure that CDP counselors and tutors follow up with CDP students, including “at risk” students, who do not receive counseling or tutoring services.
- Ensure that the counselors and tutors document their follow-up efforts.
- Set minimum standards for the provision of counseling and tutoring services to CDP students, including “at risk” students.
- Develop a procedure for tracking the mid-semester progress of CDP students.

CUNY Response

CUNY and CDP officials disagreed with several of the audit’s findings but agreed or partially agreed with three of the audit’s four recommendations. We address the full scope of CUNY’s response in a section entitled “Discussion of CUNY Response” that we present at the end of this report.

INTRODUCTION

Background

The College Discovery Program (CDP) of the City University of New York (CUNY) was created in 1964 as a special program for educationally and economically disadvantaged students who otherwise might not be able to attend college. CDP provides academic and financial support to students through specialized counseling, tutorial services, remedial instruction, and payments for book expenses at the six community colleges.¹

For purposes of determining CDP eligibility, a student is considered to be educationally disadvantaged if he or she (1) has earned a State-approved General Equivalency Diploma, (2) is from a high school that has a poor record for academically preparing students, (3) has been tracked or scheduled into a general high school program, (4) has been out of high school for a number of years, or (5) ranks low on traditional measures of college admissions criteria, such as high school average and class standing. A student is considered to be economically disadvantaged if the family's income and other available financial resources fall within the economic eligibility criteria established by the State Commissioner of Education.

Community college presidents are responsible for the administration of CDPs on their campuses. Each college CDP has its own policies regarding counseling, tutoring, and other program services for CDP students. However, CDPs must adhere to CUNY's operational guidelines. The CUNY Office of Special Programs is responsible for the central coordination and oversight of CDP in relation to academic, personnel, and budget matters.

For Fiscal Year 2007, CDP enrollment at the six community colleges totaled 2,433 students. CDP expenses at these schools totaled \$3,023,981.

On February 2, 2003, our office issued an *Audit Report on the Operating Practices of the City University of New York College Discovery Program* (MD02-067A). The audit report concluded that there was no comprehensive process to measure and report on the effectiveness of the six community college CDPs. In addition, the audit found that students did not fully use CDP counseling and tutoring services at two sampled schools and that counselors at the colleges did not monitor student progress adequately.

Objective

The objective of this audit was to determine whether CUNY implemented the 11 recommendations made in the February 2, 2003, audit report.

¹ CUNY's six community (two-year) colleges are Borough of Manhattan Community College (BMCC), Bronx Community College, Hostos Community College, Kingsborough Community College, LaGuardia Community College, and Queensborough Community College.

Scope and Methodology

The period covered by this audit was July 1, 2006, through June 30, 2007 (Fiscal Year 2007).

To determine the implementation status of the recommendations, we interviewed CDP directors at each of the six community colleges. We also interviewed the University Assistant Dean of Special Programs, the Director of Special Programs, and the University Dean of the Office of Institutional Research and Assessment (OIRA).

In addition, we reviewed relevant documentation, including CUNY's *Guidelines for the Structure and Operation of the College Discovery Program of the City University of New York—June 1994*; the *2004-2007 Academic Plans—Community Colleges*; the 2006-2007 CD Program Budget Allocation; the 2006-2007 CD Program Expenditure Reports; the *BMCC College Discovery Program Student Handbook—2005-2007*; and *College Discovery at LaGuardia Community College*.

To assess CDP student use of counseling and tutoring services, we obtained Student Information Management System (SIMS) database lists of students enrolled in CDP at each community college during Fiscal Year 2007 and selected a random sample of 25 students from each of three judgmentally selected schools: BMCC, LaGuardia, and Kingsborough. Of the 75 students, 63 were registered during the Fall 2006 semester, 63 were registered during the Spring 2007 semester, and one student at Kingsborough did not register for either semester. (There were 1,460 CDP students in total at the three schools.) At the sample schools, we obtained counseling logs, tutoring logs, and related documentation to assess whether the sampled students received adequate counseling and tutoring services and whether counselors or tutors attempted to contact students who did not receive such services. We also reviewed the sampled students' transcripts to identify those who were "at risk" of failing and to determine whether those students were referred to or obtained counseling and tutoring.

As part of our review of controls, we assessed the reliability of SIMS data obtained from CUNY on students who participated in the CDP program during Fiscal Year 2007. For the 75 sampled students, information such as student names and identification numbers appearing on the SIMS database list of CDP students was compared to information found at the three selected schools. From information at the three selected schools, we randomly selected an additional 75 CDP students to determine whether they were identified on the SIMS database list.

In December 2007, we received a SIMS list showing that 212 CDP students were enrolled in Kingsborough during Fiscal Year 2007. However, when, as part of our data reliability review, we randomly selected 25 CDP student files and compared the information in these files to the SIMS list, we found that 18 of these students were not on the SIMS list. We informed Kingsborough of these results on December 17, 2007. However, we did not receive a revised list from Kingsborough until February 29, 2008. The revised list identified 493 CDP students as having been enrolled in Kingsborough during Fiscal Year 2007 (and included the 18 students that we found were not on the December 2007 list). The primary difference between

these two lists was that the first list excluded English as a Second Language (ESL) students and the second one included them.

In order to proceed with the audit, we selected 25 CDP students for audit testing from the list of 212 CDP students provided to us in December 2007. When Kingsborough provided the revised list of 493 CDP students at the end of February 2008, we were completing our review of the counseling and tutoring services received by the 25 CDP students in our sample at Kingsborough and the total of 50 CDP students in our samples at BMCC and LaGuardia.

We decided not to expand our sampling of students at Kingsborough to include the ESL students on the revised list for two reasons. First, ESL students were included in the populations from which we selected our samples at BMCC and LaGuardia. Second, our audit results at Kingsborough were similar to our results at BMCC and LaGuardia. As indicated above in the Audit Report in Brief section of this report, CDP students at each of these schools often did not receive required counseling and tutoring services.

The results of the above tests, while not statistically projected to their respective populations, provide a reasonable basis to determine whether CUNY implemented the recommendations made in the previous report.

This audit was conducted in accordance with generally accepted government auditing standards (GAGAS) and included tests of records and other auditing procedures considered necessary. This audit was performed in accordance with the audit responsibilities of the City Comptroller, as set forth in Chapter 5, §93, of the New York City Charter.

Discussion of Audit Results

The matters in this report were discussed with CUNY officials during and at the conclusion of this audit. A preliminary draft report was sent to CUNY officials on April 23, 2008, and was discussed at an exit conference held on May 15, 2008. We submitted a draft report to CUNY officials on June 5, 2008 with a request for comments. We received a written response from CUNY officials on June 19, 2008. The response included comments from CUNY officials in the Office of Special Programs (OSP) and from CDP officials at BMCC and Kingsborough. CUNY's response stated that the LaGuardia response would be attached; however, we did not receive this response. We granted CUNY additional time to provide the LaGuardia response but it was still not provided. In their responses, CUNY and CDP officials disagreed with several of the audit's findings but agreed or partially agreed with three of the audit's four recommendations.

In their response, CUNY and CDP officials strongly disagreed with some of the audit's methodology and conclusions. After carefully reviewing the response, we have concluded that their arguments are without merit. Accordingly, we have not altered the audit's findings.

The full text of the response from CUNY and CDP officials is included as an addendum to this report. We address the full scope of CUNY’s response in a section entitled “Discussion of CUNY Response” that we present at the end of this report.

RESULTS OF FOLLOW-UP AUDIT

Of the 11 recommendations made in the previous audit, CUNY implemented one, partially implemented another, and did not implement nine.

OIRA now prepares many informative tables relating to the performance of the community college CDPs. These tables provide a comprehensive picture of students' academic progress, including their retention rates, Grade Point Averages (GPAs), credit accumulation, and graduation rates. The tables allow for comparisons of CDP student performance at each of the six community colleges and between CDP students and non-CDP students. For example, one set of tables showed that, in terms of student persistence rates (a rate combining student retention and graduation data), CD students generally performed better than non-CD students.

However, CDPs continue to have limited success in ensuring that their students take advantage of counseling and tutoring services provided by the program. Twenty-six (41%) of the 63 sampled students who registered for the Fall 2006 semester did not receive the required number of counseling sessions during the semester, and 43 (68%) of the 63 sampled students who registered during the Spring 2007 semester did not receive the required number of counseling sessions during the semester. Concerning tutoring, 50 (79%) of the 63 sampled students who registered for the Fall 2006 semester did not receive tutoring services during the semester and 57 (90%) of the 63 sampled students who registered for the Spring 2007 semester did not receive tutoring services during the semester. Furthermore, CDPs often fell short when it came to providing these services to students who were "at risk" of failing.

This follow-up audit concluded that CDPs could benefit from the establishment of minimum CUNY counseling and tutoring standards that would provide guidance to the CDPs and better enable CUNY to monitor their performance.

Previous Finding: "Lack of Measurable Objectives to Evaluate Program Effectiveness and Student Progress"

CDP guidelines require the community colleges to monitor and report on student progress and to develop quantifiable indicators of student achievement for evaluation purposes. However, the previous audit found that there was no CUNY process to measure and report on the academic progress of their CDP students or on the effectiveness of the six community college CDPs.

Previous Recommendation #1: "CUNY should evaluate the CDPs at the individual colleges using uniform performance indicators, such as student retention rates and the academic progress of students who use the program services, and should compare them to those of students (both CDP and non-CDP) who do not use program services."

Previous CUNY Response: "All programs track the progress of students through standard, uniform measures of progress and pursuit determined by the State Office of Education (primarily for the purpose of administering the Tuition Assistance Program).

“As well, there is a comprehensive process to measure and report on program effectiveness. . . . Programs are asked to articulate goals and objectives and plans for measuring how effectively they have met these goals.

“Student retention rates, GPA, credit accumulation and graduation data are produced by the Office of Institutional Research. Comparisons are routinely made with non-program students. The Central Office administration will continue to monitor student outcomes and review this data to make program improvements and comparisons with national data.”

Current Status: IMPLEMENTED

CUNY provided us with a number of informative tables routinely produced by OIRA relating to the performance of the community college CDPs. These tables provide data on various performance indicators, including cumulative GPAs, student retention rates, and pass rates on reading, writing, and mathematics assessment tests. Many of the tables allow for comparisons of student performance at each of the six community colleges and between CDP students and non-CDP students. For example, one table, on the October 2006 CUNY Proficiency Exam, showed the numbers of CDP and non-CDP students who took the exam and the percentages of these students who passed at each community college. According to this table, non-CDP students performed better than CDP students on the exam. For another example, a set of tables showed that, in terms of student persistence rates (a rate combining student retention and graduation data), CD students generally performed better than non-CD students. CUNY officials stated that OIRA data allow CDPs to better gauge their performance and to identify aspects of their programs that may need improvement.

Previous Finding: “Students Do Not Fully Use Counseling Services”

The previous audit found that students at two sampled schools (Hostos and LaGuardia) did not fully use CDP counseling services. The review of Hostos CDP counseling logs and related documentation found that 19 (35%) of the 54 sampled students did not meet with their counselors at least twice during the Fall 1999 semester and 11 (20%) of the 54 sampled students did not meet with their counselors at least twice during the Spring 2000 semester, as required by the Hostos CDP. At LaGuardia, 24 (48%) of 50 sampled students did not meet with their counselors a least once during the Fall 1999 semester and 20 (40%) of the sampled students did not meet with their counselors at least once during the Spring 2000 semester, as required by the LaGuardia CDP. Furthermore, the audit found that the CDP counselors at the two schools did not adequately follow up to determine why students were not coming in for counseling sessions or to encourage them to do so.

Previous Recommendation #2: “CDP counselors should contact students who do not come in for the required number of counseling sessions to determine why they do not come in and encourage them to do so.”

Previous Recommendation #3: “CDP officials should ensure that counselors document their attempts to follow up with students who do not come in for counseling as required.”

Previous CUNY Response: “All programs monitor and document counselor contacts via logs. Students who do not attend required counseling sessions are contacted via follow-up calls and letters.”

Previous LaGuardia Response: “A significantly greater number of students than the figures cited in the auditors Draft report met with their counselors frequently and received counseling through the New Student Seminar. . . .

“During their first semester at LaGuardia, new students register for New Student Seminar which is designed to provide students with an orientation to LaGuardia and the information and skills they need to be successful in college.”

Current Status of Recommendations #2 and #3: NOT IMPLEMENTED

Our review of counseling logs at the three selected schools revealed that CDPs continue to have limited success in ensuring that their students take advantage of counseling services and that counselors generally did not document their outreach efforts to encourage a greater use of counseling resources. As shown in Table I, below, the counseling logs revealed that 41 percent of the sampled students did not receive the required number of counseling sessions during the Fall 2006 semester.

Table I
Sampled Students Who Did Not Receive
Required Counseling Services at the Selected Schools
Fall 2006

Community College	Counseling Requirement	Number of Sampled Students Who Registered	Number of Sampled Students Who Did Not Meet Counseling Requirements	Percentage of Sampled Students Who Did Not Meet Counseling Requirements
BMCC	Freshmen: three times per semester for the first two semesters; continuing students: twice per semester for each subsequent semester.	23	7	30%
LaGuardia	Once per week for the first semester, then once per semester thereafter	23	10	43%
Kingsborough	Twice per semester	17	9	53%
Totals		63	26	41%

As shown in Table II, below, the counseling logs revealed that 68 percent of the sampled students did not receive the required number of counseling sessions during the Spring 2007 semester.

Table II
Sampled Students Who Did Not Receive
Required Counseling Services at the Selected Schools
Spring 2007

Community College	Counseling Requirement	Number of Sampled Students Who Registered	Number of Sampled Students Who Did Not Meet Counseling Requirements	Percentage of Sampled Students Who Did Not Meet Counseling Requirements
BMCC	Freshmen: three times per semester for the first two semesters; continuing students: twice per semester for each subsequent semester.	21	11	52%
LaGuardia	Once per week for the first semester, then once per semester thereafter	18	16	89%
Kingsborough	Twice per semester	24	16	67%
Totals		63	43	68%

Ensuring that the educationally and economically disadvantaged students participating in the CDP receive sufficient counseling is extremely important in that it can be instrumental in helping the students overcome obstacles to success.

For those students who did not come in for the required number of counseling sessions, there is a lack of evidence that CDP counselors contacted the students to determine why they did not come in and to encourage them to do so. All three schools maintained some type of log summarizing actions taken by counselors on individual students. According to these logs, 36 of the 74 sampled students who registered received some type of counselor outreach during the Fall 2006 or Spring 2007 semesters.² These contacts included outreach efforts made by telephone, letter, or e-mail. However, counselors generally did not document in log notes the purpose for the outreach efforts. By documenting the purpose of these contacts, the CDPs would be in a better position to review the extent and effectiveness of their efforts to encourage students to obtain the required counseling.

Previous Recommendation #4: “CDP officials at the CUNY level should consider standardizing individual college CDP counseling service requirements.”

² Of the 36 outreach efforts, 20 were made at BMCC, 10 at Kingsborough, and 6 at LaGuardia.

Previous CUNY Response: “The overall mission and goals of the program are standard for each campus. However, implementation of the program goals is left to each campus so that the unique populations might be best served. However, the Central Office will continue to closely monitor documentation of counseling contacts and explore new ways of using technology to improve this process.”

Current Status: NOT IMPLEMENTED

CDP officials reiterated the need to leave the responsibility for setting counseling goals and standards to administrators at the school level. School officials believe that they are best able to gauge their students’ needs due to the unique cultural makeup of each school’s population.

Nevertheless, establishing minimum counseling service requirements for all schools would help ensure that all students receive at least a basic level of counseling at each school. This is especially important for CDP students because they come into the program with significant academic and financial needs. These students generally performed poorly at the high school level and may do the same at the college level without the guidance that CDPs can provide. Therefore, it is essential that these students receive a high level of professional counseling. To ensure that the schools provide at least a basic level of this service, CUNY should set minimum CDP counseling guidelines. Such guidelines would also better enable CUNY to monitor the provision of such services.

Previous Finding: “Students Do Not Fully Use Tutoring Services”

The previous audit found that CDP students at the two sampled colleges did not fully use the program’s tutoring services. The review of the Hostos CDP tutoring logs and related documentation disclosed that 36 (67%) of the sampled students received no tutoring during either the Fall 1999 or Spring 2000 semesters, or both. The need for tutoring was especially evident for 14 of these students, who failed one or more courses during the Fall 1999 semester. The review of LaGuardia CDP tutoring logs and related documentation disclosed that 45 (90%) of the sampled students received no tutoring during either the Fall 1999 or Spring 2000 semesters, or both. The need for tutoring was especially evident for 13 of these students, who failed one or more courses during the Fall 1999 semester.

Previous Recommendation #5: “CDP tutors should contact students who do not come in for tutoring services to determine why they do not come in and encourage them to do so.”

Previous Recommendation #6: “CDP officials should ensure that counselors document their attempts to follow up with students not receiving tutoring services.”

Previous CUNY Response: “Tutors do follow up on students who do not come in for tutoring. Counselors and tutors both record information in student files about missed sessions so tutors and counselors are aware of student participation. . . .

“Students often experience tutoring in a group setting, as part of a regular class. In these cases, tutoring might not be separately listed in the student file, but embedded in the description of the particular course to which it is attached. . . .

“The Central Office will continue to explore the use of technology to improve the process of documenting the many forms of tutoring a student might receive.”

Current Status of Recommendations #5 and #6: NOT IMPLEMENTED

Our review of tutoring logs at the three selected schools revealed that the sampled students usually did not receive tutoring services and that counselors and tutors generally did not document their outreach efforts to encourage a greater use of tutoring resources. Although CDP students are not required to receive tutoring, considering that CDP students are considered to be educationally disadvantaged and that tutoring is a significant component of the program, we would have expected that a higher percentage of CDP students would have received tutoring. Table III, below, shows that 79 percent of the sampled students who registered for the Fall 2006 semester did not receive tutoring during the semester.

Table III
Sampled Students Who Did Not Receive
Tutoring Services at the Selected Schools
Fall 2006

Community College	Number of Sampled Students Who Registered	Number of Sampled Students Who Did Not Receive Tutoring Services	Percentage of Sampled Students Who Did Not Receive Tutoring Services
BMCC	23	18	78%
LaGuardia	23	17	74%
Kingsborough	17	15	88%
Totals	63	50	79%

Table IV, below, shows that 90 percent of the sampled students who registered for the Spring 2007 semester did not receive tutoring during the semester.

Table IV
Sampled Students Who Did Not Receive
Tutoring Services at Selected Schools
Spring 2007

Community College	Number of Sampled Students Who Registered	Number of Sampled Students Who Did Not Receive Tutoring Services	Percentage of Sampled Students Who Did Not Receive Tutoring Services
BMCC	21	18	86%
LaGuardia	18	15	83%
Kingsborough	24	24	100%
Totals	63	57	90%

The mission of the CDP is to ensure that students are afforded every opportunity to succeed in school. Tutoring is an essential service for CDP students to improve their chances for achieving academic success. CDPs should enhance their efforts to ensure that CDP students receive the tutoring they need.

To determine whether CDP counselors or tutors contacted students who did not come in for tutoring services, we asked the selected schools to provide tutoring logs showing contacts or outreach efforts made to students. BMCC used a College Discovery Tutoring Call Log—Missed Session sheet to record the name of a student who missed a tutoring session and the date of the missed session. For the Fall 2006 and Spring 2007 semesters, BMCC provided us with copies of many missed-session sheets and associated e-mail messages sent to students notifying them that they had missed their tutoring sessions. However, for the 18 sampled students who did not receive tutoring at BMCC during the Fall 2006 semester and the 18 sampled students who did not receive tutoring at BMCC during the Spring 2007 semester, BMCC was only able to provide us with missed-session sheets and associated e-mails for 2. For the others, there was no indication that tutoring sessions were ever scheduled or that the students were specifically contacted to encourage the receipt of tutoring services.

LaGuardia provided an example of a Missed Tutoring Appointment letter that it claims it sends to students who missed tutoring sessions. However, LaGuardia was unable to provide us with letters to any of the sampled students who did not receive tutoring services during the Fall 2006 or Spring 2007 semesters. In addition, there was no indication that tutoring sessions were ever scheduled for these students or that the students were ever contacted to encourage the receipt of tutoring services.

Kingsborough provided us with Supplemental Instruction Reports summarizing its efforts to provide tutoring to its CDP students. However, of the 15 sampled students who did not receive tutoring at Kingsborough during the Fall 2006 semester and the 24 sampled students who

did not receive tutoring at Kingsborough during the Spring 2007 semester, only one of the sampled students appeared in any of these reports.

As stated above, 36 of the 74 sampled students who registered received some type of counselor outreach during the Fall 2006 or Spring 2007 semesters. However, counselors generally did not document the purpose for the outreach efforts. By documenting the purpose of these contacts, the CDPs would be in a better position to review the extent and effectiveness of its efforts to encourage students to obtain tutoring.

At the exit conference, CUNY officials stated that the audit did not take into consideration the tutoring that is provided to CDP students in certain classes through the Supplemental Instruction program. Supplemental Instruction is a program that is available to students who enroll in courses that have been identified and targeted as traditionally challenging for freshmen and sophomore students. Officials stated that CDP encourages and funds the supplemental instruction provided in these courses. However, two of the three sampled schools—BMCC and LaGuardia—did not provide any evidence that any of the sampled CDP students received such supplemental instruction. Although Kingsborough provided Supplemental Instruction reports for the Fall 2006 and Spring 2007 semesters, the reports indicate that only one of the sampled students received supplemental instruction during the school year.

Previous Finding: “‘At Risk’ Students Do Not Fully Use CDP Services”

The previous audit found that CDP officials at the two sampled schools did not ensure that “at risk” students participated in program services.³ As a result, some of those students never received counseling or tutoring services and continued to perform poorly.

For the 54 sampled students from Hostos Community College, 27 (50%) were considered “at risk” at the end of the Fall 1999 semester, based on the criteria specified under the CDP Early Warning Prevention Program. Of these students, 12 (44%) did not meet with a counselor at least twice during the Fall 1999 semester and 4 (15%) did not meet with a counselor at least twice during the Spring 2000 semester, as required by the Hostos CDP. In addition, 15 (56%) of the 27 “at risk” Hostos students did not receive tutoring services during the Fall 1999 Semester and 21 (78%) did not receive tutoring services during the Spring 2000 semester.

For the 50 sampled students at LaGuardia Community College, 32 (64%) were considered “at risk” at the end of the Fall 1999 semester. Of these students, 16 (50%) did not meet with a counselor at least once during the Fall 1999 semester and 6 (19%) did not meet with a counselor at least once during the Spring 2000 semester, as required by the LaGuardia CDP. In addition, 18 (56%) of the 32 “at risk” LaGuardia students did not receive tutoring during the Fall 1999 semester, and 9 (28%) did not receive tutoring services during the Spring 2000 semester.

³ “At risk” is a term used in the prior audit to identify students who failed a class or received a mid-semester progress report indicating the possibility of failure, did not meet the minimum level of proficiency in a remedial class, received an “incomplete” grade, or did not maintain the cumulative GPA necessary to avoid being placed on academic probation.

Furthermore, the previous audit found that the two colleges did not adequately follow up to determine why “at risk” students were not attending counseling or tutoring sessions or to encourage them to do so.

Previous Recommendation #7: “CDP counselors or tutors should contact ‘at risk’ students who do not come in for counseling or tutoring services to determine why they do not come in and to encourage them to do so.”

Previous Recommendation #8: “CDP officials should ensure that counselors document their attempts to follow up with ‘at risk’ students who do not receive counseling or tutoring services.”

Previous CUNY Response: “Counselors and tutors do contact ‘at risk’ students who do not come in for counseling or tutoring services. Records of these attempts are kept in student files. Often these services are provided in small group sessions. In these cases attendance records are kept.”

Previous LaGuardia Response: “As soon as a student has earned a GPA of less than 2.00 we send them a ‘Probation’ letter as part of our ‘Early Warning System.’ . . . The letters notify these students that they must see their counselors to discuss their academic status.

“The CDP at LaGuardia is presently exploring new avenues to contact and track those students who do not avail themselves of the services provided by the program. The CDP is exploring ways in which it can utilize the College’s new ‘Response Center’ to contact students who are not responding to letters sent by the program and are not seeing their assigned CD counselor as required, as early as possible during the course of the first semester.”

Current Status of Recommendations #7 and #8: NOT IMPLEMENTED

The three selected schools provided examples of letters and reports they use to document that they reached out to those “at risk” students who did not receive required counseling or tutoring. However, there was no documentation to show that any of the “at risk” students in our sample were contacted.

The need for counseling and tutoring services is vital for students identified as being “at risk.” However, counseling and tutoring logs at the selected schools revealed limited use of these services by “at risk” CDP students. Table V, below, shows that, based on counseling and tutoring logs for the Fall 2006 semester, 12 (39%) of the 31 sampled students who were considered to be “at risk” did not receive required counseling services and 23 (74%) of the 31 students did not receive tutoring services during the semester.

Table V
Sampled “At Risk” Students
Who Did Not Receive Required Counseling and
Tutoring Services at the Selected Schools
Fall 2006

Community College	Number of Sampled Students Who Registered	Number of Sampled “At Risk” Students	Number of Sampled “At Risk” Students Who Did Not Meet Counseling Requirement	Percentage of Sampled “At Risk” Students Who Did Not Meet Counseling Requirement	Number of Sampled “At Risk” Students Who Did Not Receive Tutoring Services	Percentage of Sampled “At Risk” Students Who Did Not Receive Tutoring Services
BMCC	23	11	3	27%	8	73%
LaGuardia	23	11	5	45%	8	73%
Kingsborough	17	9	4	44%	7	78%
Totals	63	31	12	39%	23	74%

Table VI, below, shows that during the Spring 2007 semester, 16 (64%) of 25 sampled students considered to be “at risk” did not receive required counseling services and 23 (92%) of the 25 students did not receive tutoring.

Table VI
Sampled “At Risk” Students
Who Did Not Receive Required Counseling and
Tutoring Services at the Selected Schools
Spring 2007

Community College	Number of Sampled Students Who Registered	Number of Sampled “At Risk” Students	Number of Sampled “At Risk” Students Who Did Not Meet Counseling Requirement	Percentage of Sampled “At Risk” Students Who Did Not Meet Counseling Requirement	Number of Sampled “At Risk” Students Who Did Not Receive Tutoring Services	Percentage of Sampled “At Risk” Students Who Did Not Receive Tutoring Services
BMCC	21	7	3	43%	6	86%
LaGuardia	18	9	8	89%	8	89%
Kingsborough	24	9	5	56%	9	100%
Totals	63	25	16	64%	23	92%

These tables indicate that CDPs have not made improvements in this area since the previous audit. The provision of services to “at risk” students is a vital part of CDP. These students are the most likely to be put on probation, quit, or be dismissed by the college. Therefore, it is essential that a concerted effort be made to strongly encourage all “at risk” students to take full advantage of available counseling and tutoring services. Counselors and tutors should document all outreach efforts that encourage a greater use of counseling and tutoring resources by “at risk” students.

Previous Recommendation #9: “CDP officials should consider standardizing required individual college services for ‘at risk’ students.”

Previous CUNY Response: “Interventions for student who are ‘at risk’ must be and are tailored to the individual situation and student. . . . To the extent that each campus has its own unique and diverse student population, the interventions developed to provide academic support must address the varying needs of the students. The Central Office will continue to explore additional means by which these students can be monitored and work to ensure that this monitoring is documented.”

Current Status: NOT IMPLEMENTED

CUNY officials told us that they want to continue to give CDP officials at the school level the flexibility to design their own counseling and tutoring programs. However, our review of the counseling and tutoring services provided to the sampled “at risk” students at the three selected schools revealed a need to improve the assistance given to such students. Although a significant degree of flexibility is desirable to encourage the development of innovative

programs that can best meet the needs of each CDP's unique student population, establishing minimum standards can help ensure that each school makes a concerted effort to provide basic counseling and tutoring services to each CDP student, especially to "at risk" students.

Previous Finding: "Counselors Do Not Adequately Monitor Student Progress"

The previous audit found that CDP counselors at the two sampled colleges did not adequately monitor student progress. At Hostos, 31 (57%) of the students did not submit Mid-Semester Progress Reports for counselors to review. At LaGuardia, there was no evidence that counselors reviewed student GPAs to monitor student progress.

Previous Recommendation #10: "CDP officials should ensure that the colleges track CDP student progress."

Previous Recommendation #11: "CDP officials should consider standardizing the ways individual colleges track student progress."

Previous CUNY Response: "Student progress is tracked uniformly at each of the colleges. All CUNY units use the Student Information Management System (SIMS) to record data on individual students. The system is used to record student programs and generate student transcripts on students at each of the units. Moreover, the University Office of Institutional Research tracks students university-wide providing comparison data for program and non-program students. However, the Central Office will continue to explore technology that might assist local programs with tracking their students."

Current Status of Recommendation #10: PARTIALLY IMPLEMENTED

BMCC and Kingsborough CDP officials state that they request student mid-semester progress reports from instructors for the CDP counselors to review. These reports contain the instructors' assessment of student performance during the semester. The instructors are asked to identify those CDP students who are in danger of failing the courses and are thus in need of enhanced tutoring or counseling services. The BMCC progress report (known as the Academic Assessment Information Form) asks the instructor to indicate whether the student is attending class, completing homework assignments, and passing the course. The report also offers the faculty member the opportunity to select from several listed recommendations as to what the student should do to improve. However, there was no evidence that mid-semester progress reports had been prepared during the Fall 2006 and Spring 2007 semesters for 19 of the 25 BMCC students in our sample. Of the 25 students in our sample at this school, 11 failed one or more classes during the Fall 2006 and Spring 2007 semesters. Mid-semester progress reports were prepared for only 3 of the 11 students. For only two of the three students were mid-semester progress reports prepared for at least one of the classes that they failed.

On March 12, 2008, we requested that Kingsborough provide its mid-semester progress reports on the 24 students in our sample who registered at this school during the scope period.

On May 7 and 15, 2008, after the issuance of the preliminary draft report, Kingsborough provided mid-semester progress reports for 18 of the 24 students.

LaGuardia does not complete mid-semester progress reports. LaGuardia officials told us that they track student GPAs at the end of each semester in order to identify those students who are “at risk.” However, this is often too late, as many students have already failed their courses by then. In fact, of the 25 students in our sample at this school, 15 failed one or more classes during the Fall 2006 and Spring 2007 semesters.

Without some procedure for receiving mid-semester progress reports from instructors, the CDPs cannot effectively identify students who are failing their courses. Consistent use of mid-semester progress reports would provide CDP counselors with timely information on student performance and better enable them to provide prompt help to those who are failing.

CDP officials state that instructors often do not respond to requests for mid-semester progress reports and that CDPs cannot compel instructors to provide them. CDP officials also said that they rely on students to provide information during counseling sessions on how well they are doing in their coursework.

By establishing a procedure for more effectively tracking the mid-semester progress of CDP students, CDPs would be in a better position to provide timely counseling and tutoring services to struggling students. Asking instructors to complete mid-semester progress reports for each CDP student is only one possible approach. Another option would be to ask instructors to inform CDP whenever a CDP student is at serious risk of failing a class. The community college CDP could then encourage the student to seek counseling and tutoring services. Only relying on students to inform their counselors that they are at risk of failing a class would likely lead to counselors often being unaware of a problem until it is too late.

Current Status of Recommendation #11: NOT IMPLEMENTED

With regard to this recommendation, CUNY continues to express an interest in providing a high degree of flexibility to each community college CDP. However, in terms of obtaining information on the mid-semester progress of CDP students, CUNY should standardize the way in which each community college CDP tracks student progress. This approach could help the individual community college CDPs obtain the cooperation they need from instructors so that struggling CDP students are identified early and offered help promptly.

RECOMMENDATIONS

To address the issues that still exist, CUNY should:

1. Ensure that CDP counselors and tutors follow up with CDP students, including “at risk” students, who do not receive counseling or tutoring services.

CUNY Response: “The audit findings do demonstrate a need to strengthen record keeping practices in the counseling units so that counselors record every student contact on the counseling logs.”

Kingsborough Response: “Counselors and tutors will continue to conduct the massive mailings done at the beginning of each semester. Program will develop a ‘sanction letter’ that will be used as a follow-up to initial letter sent to ‘at risk’ students to notify them that if they do not come in for services they risk being removed from program.”

2. Ensure that the counselors and tutors document their follow-up efforts.

CUNY Response: “The audit findings do demonstrate a need to strengthen record keeping practices in the counseling units so that counselors record every student contact on the counseling logs.”

Kingsborough Response: “Counselors and tutors continue to document their contacts with the students. In addition program will be implementing an ‘access data base system’ that will facilitate the program's ability to record and track the students use of CD services.”

3. Set minimum standards for the provision of counseling and tutoring services to CDP students, including “at risk” students.

CUNY Response: “The University believes that the auditors’ recommendation that ‘CDPs could benefit from the establishment of minimum CUNY counseling and tutoring standards that would provide guidance to the CDPs and better enable CUNY to monitor their performance,’ is based on the faulty premise that Programs operate without minimum counseling standards and/or that the standards are not generally known. The University requires each Program to establish minimum guidelines for counseling contacts and to report them in the Academic Plan and other local publications. Having the counseling standards set Centrally for the sake of uniformity is not likely to improve outcomes. The University reviews the Academic Plans carefully and closely monitors student performance outcomes and the attainment of performance goals set by the Programs. The University intervenes if it deems practices or standards are insufficient to net desired results. For example, at one community college incoming CD freshmen took the Program’s Introduction to College Life seminar during the pre-freshman summer program but had no group orientation in the fall semester. Retention rates suffered, and the University required the program to offer the course during the fall semester. ... The cultural norm at CUNY dictates that effective change is best gained through collaboration and a review of campus driven goals, not from University mandates designed to homogenize college policies and practices.”

Auditor Comment: We continue to believe that CUNY’s establishment of minimum standards for counseling and tutoring services, especially for “at risk” students, would provide helpful guidance to the CDPs and facilitate CUNY monitoring. Establishing minimum standards would not homogenize each community college’s CDP policies and

practices. Each community college CDP can maintain a significant degree of flexibility consistent with meeting the minimum standards.

4. Develop a procedure for tracking the mid-semester progress of CDP students.

CUNY Response: “The University agrees that mid-semester progress reports are an excellent assessment tool and that end of the semester monitoring is, ‘often too late, as many students have already failed their courses by then.’ However, CD has not always been successful securing reports from faculty nor can CD Programs compel faculty compliance. Even at the College of Staten Island where the reports are requested college-wide, the University Registrar reports that faculty response is limited. The Office of Special Programs will consult with the University Provost to consider presenting mid-semester reports as part of the University’s Campaign for Student Success in Fall 2008.”

Kingsborough Response: “CD program will continue to mail out the mid-semester progress reports. In addition we will explore using a KCC exRoster system which also documents when students have not been attending class.”

Discussion of CUNY Response

In their response, CUNY and CDP officials strongly objected to our audit methodology and some of our findings. We disagree with their arguments and therefore have added this discussion to address the main issues raised in the response. (For the full text of CUNY’s response, see the Addendum of this report.)

Audit Process and Definitional Issues

CUNY Response: “The University posits that the auditors went beyond the scope of the audit and their area of expertise when they imposed their judgment to determine what is ‘adequate tutoring’ and which students are ‘at risk.’ The University contends that it is the responsibility of the six College Discovery Programs to determine counseling and tutoring requirements for their students. The requirements are outlined in the Program Academic Plans, Student Handbooks, and other Program communications. The auditors’ role should be to determine whether the Program follows the guidelines it promulgates. Instead, the auditors made the judgment that all students by virtue of being enrolled in College Discovery are ‘at risk’ and should thus be enrolled in tutoring. It is important to note that the term ‘at risk’ has a connotative rather than a denotative meaning and is used to describe a variety of circumstances.”

Auditor Comment

First, our report has consistently recognized that all CDP students do not require tutoring. However, all CDP students were considered to have been educationally disadvantaged prior to being accepted into CDP. Therefore, it would be expected that a significant percentage of students, although not all, would need tutoring. The fact that 79 percent of sampled CDP

students in the Fall semester and 90 percent of sampled CDP students in the Spring semester did not receive tutoring is an indication that the CDPs should enhance their efforts to encourage greater use of this service.

Second, our definition of “at risk” students is clearly presented in the report and corresponds with the definition that was used during the previous audit. We define an “at risk” student to be one who has failed a class or received a mid-semester progress report indicating the possibility of failure, did not meet the minimum level of proficiency in a remedial class, received an “incomplete” grade, or did not maintain a cumulative GPA necessary to avoid being placed on academic probation. There is no higher level of “expertise” needed to determine that such students are “at risk.” Any one of these results indicates that the CDP student is in danger of failing academically.

Third, CUNY’s understanding of the audit process is fundamentally flawed. Auditors are not limited to reviewing an entity’s compliance with its own guidelines. Auditors are expected to review the adequacy of the management controls established by an entity to ensure that the entity’s objectives are met. If auditors conclude that an entity’s guidelines are inadequate in this respect, then it is the responsibility of the auditor to disclose this conclusion. In this audit, we believe that CUNY’s definition of “at risk” students, which focuses primarily on those students who are on academic probation, is too narrow. Failure to complete or pass classes should also serve as an early warning of trouble, even if a student’s overall GPA keeps the student out of academic probation.

CUNY Response

Kingsborough stated: “KCC supports the definition of the ‘at risk’ term used by the auditors however, with regard to the category of students who ‘... do not meet the minimum level of proficiency in a remedial class’ some qualification needs to be made. When considering ‘failing or non failing’ as an indicator, it is important to note that an ‘R’ grade in a developmental course is not the same as an ‘F’ in a credit bearing course and does not indicate that student ‘fail class.’ The grading system in the developmental course is different. For example, a student may receive an R grade in English 93 (developmental) yet moves on to the next semester to take English 12 (credit bearing). Similarly, a student may receive an R grade in the Fall semester and receive a passing grade in the ‘module semester’ which is considered part of the Fall semester (quirk in KCC semester system).”

Auditor Comment

We are pleased that Kingsborough generally agrees with our definition of “at risk.” However, we are puzzled at Kingsborough’s position that an “R” grade is not as serious as an “F” grade. Both grades reflect the student’s inability to pass a course, whether it is a developmental course or a credit-bearing course. According to the Kingsborough grading system, “R” grades indicate that the “minimum level of proficiency [was] not met for remedial courses.” Again, we believe that a student who has not achieved a minimum level of proficiency in a remedial class is “at risk” of further failure and should be strongly encouraged to obtain additional counseling and tutoring services.

Information Collection and Documentation Issues

CUNY Response: “A second shortcoming in the methodology was to assume that the full extent of student use of support services and scope of Program interventions could be ascertained by reviewing specific, pre-determined documents rather than posing open-ended questions designed to reveal the information the auditors were seeking. For example, instead of asking directors to describe all activities used to monitor student progress, the auditors requested copies of the mid-semester monitoring reports; rather than determining the scope of academic interventions available to CD students, the auditors primarily based their findings on what is recorded in the tutoring logs. Thus the resulting assessment does not reflect student attendance in college run tutoring centers, counseling contacts in group seminars, or address practices like end-of-semester probation review processes.”

Auditor Comment

We regularly asked CUNY to provide us with any additional documentation it had that showed the additional counseling and tutoring services it claims it provided to the students in our samples. We made this request again at the exit conference held on May 15, 2008. We received an e-mail message from a CUNY official on May 19, 2008, which stated: “The University has decided not to submit supplemental documents in response to the Preliminary Audit Report of College Discovery.”

CUNY Response

Kingsborough stated: “During the December 2007 audit when the auditors visited KCC they focused primarily on admission folders and counseling documentation. Auditors requested copies of ‘counseling logs, and related documentation’ however, the copies of logs, and samples of form letters do not provide a comprehensive picture of the activities/services the program provided. Student's individual folders may also contain pertinent information relative to counseling and tutoring services provided by College Discovery (CD). In our review to inform our response to auditors findings, we looked at the folders of the 30 students initially listed. ... KCC program keeps various documents on our supplemental instruction services. KCC tutoring log is only used for student to sign in when they report for services. In addition to the rosters that capture the walk-in students, at the end of each semester supplemental instructors prepare an instruction narrative on students that have kept standing appointments throughout the semester [copies attached]. If the student received any services during the semester, their name may appear on either of these forms.”

Auditor Comment

Again, we asked Kingsborough to provide all of its documentation on the counseling and tutoring services provided to the sampled students. We found no references to counseling or tutoring in the individual student folders we reviewed. The Supplemental Instruction Reports that Kingsborough provided to us only documented that one of the sampled students received

tutoring through supplemental instruction. This had already been reflected in the draft report submitted to CUNY.

CUNY Response

BMCC stated: “Actions were taken by the ‘CDP official’ to ensure that counselors document their attempts to follow up with students who do not come in for counseling as required. Firstly, the format of the counseling contact log – ‘Monthly Report Form’ was revised since the 2003 audit, to now include a section where the outreach activities of counselors are recorded. In addition to revising the report form/contact log, counselors have been expected to and are constantly reminded to provide documentation of outreach activities with students who fail to initiate monthly contacts. Since the 2003 audit, counselors have begun to engage in more intrusive outreach activities and are making phone calls, sending out email blasts and letters to delinquent students who do not show. *Students who fail to comply with the contact requirement are referred by their counselor to the CDP Director, for suspension or termination from the program.*”

Auditor Comment

When we indicate in the report that CDP officials should ensure that counselors document their follow-up contacts with students who do not come in for the required number of counseling sessions, we are discussing the adequacy of documentation on counselor follow-up efforts at the three sampled schools, not the actions taken by CDP officials to improve this documentation. We do point out in the report that there was evidence of counselor outreach efforts for 20 of the 25 sampled students at BMCC, but that the purpose of those efforts was generally not documented.

* * * * *

In BMCC’s and Kingsborough’s responses, CDP officials at these schools declared that many of numbers we cited in the report were incorrect. Officials stated that their figures differed from the audit’s figures in relation to the number of registered students and the number of students who did not receive counseling or tutoring services. First, no documentation was provided by BMCC and Kingsborough to support its different numbers. Our numbers are based on all the documentation provided to us by these schools during the audit. As stated above, we regularly asked CUNY to provide us with any further documentation that it had showing the additional counseling and tutoring services it claims it provided to the students in our samples. We made this request again at the exit conference held on May 15, 2008. CUNY officials declined to do so. Although Kingsborough made numerous references in its response to attached documents, none of these documents were in fact attached. As a result, there is no basis for us to change any of the numbers in our report.

In addition, there was some confusion in CUNY’s numbers. Kingsborough stated on page 8 of the Addendum that 12 of the 25 sampled students were registered during the Fall 2006 semester and that 15 of the sampled students were registered during the Spring 2007 semester. However, on page 9 of the Addendum, Kingsborough officials stated that their records indicated

that 17 of the 25 sampled students were registered during the Fall 2006 semester and that 20 of the 25 sampled students were registered during the Spring semester. One difference in our data and the data presented by BMCC and Kingsborough was that we included the few students who withdrew during a semester and the schools excluded them. Enhanced counseling or tutoring efforts may have prevented these students from withdrawing from their classes.

Other Matter

Another concern we have with the CUNY response is that CDP officials indicated that changes should be made in the report that had already been made in the draft report. For example, at the exit conference, the CDP director at BMCC provided us with a slightly different version of the program's counseling requirement than the one we had presented in the preliminary draft report. In its response to the draft report, BMCC quoted the description of the program's counseling requirement that had been presented in the preliminary draft report and failed to note that the description had been properly revised in the draft report. Similarly, in its response to the draft report, Kingsborough questions a statement in the preliminary draft report (on the need for counselors to document the "nature" of their outreach efforts) that did not appear in the draft report. Based on student confidentiality concerns expressed by CUNY at the exit conference, we clarified in the draft report that we meant that counselors should document the "purpose" of their outreach efforts (e.g., to encourage the receipt of counseling or tutoring services) and deleted our reference to the need to document the "nature" of the outreach effort.

* * * * *

After carefully reviewing the CUNY response, we have concluded that their comments are without merit. Their comments concerning our audit methodology are erroneous and appear to be based on a lack of understanding of the audit process. Furthermore, references made by CUNY and CDP officials to items that had been in the preliminary draft report but were deleted or amended in the draft report raise serious questions as to the extent to which the officials reviewed the draft report. Accordingly, we stand by our findings.



University Associate Dean
of Special Programs
535 East 80th Street
New York, NY 10075
Phone: (212) 794-5563
Fax: (212) 794-5483
cheryl.williams@mail.cuny.edu

June 19, 2008

Mr. John Graham.
The City of New York Office of the Comptroller
Executive Offices
1 Centre Street
New York, NY 10007

Re: Draft Report Response
Follow-up Audit Report on the
City University of New York
College Discovery Program
ME08-059F

Dear Mr. Graham:

Please find attached the requested response to the *Draft Follow-up Audit Report on the Operating Practices of the City University of New York College Discovery Program, ME08-059F*. If you or the audit team have additional questions, please do not hesitate to contact me at 212-794-5563.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl N. Williams', with a long horizontal line extending to the right.

Cheryl N. Williams
Associate Dean of Special Programs

cc: Lexa Logue, Executive Vice Chancellor and University Provost
Gordon Taylor, University Director of Internal Audit

**City University of New York
Office of Academic Affairs/Special Programs**

**Response to Follow-up Draft Audit Report
on the
Operating Practices
of the
City University of New York College Discovery Program**

The stated purpose of the Follow-up Audit was to determine whether the City University of New York (CUNY) implemented the eleven recommendations made in the *Audit Report on the Operating Practices of the City University of New York College Discovery Program*, MD02-067A, issued in February 2003. The following is a response to the audit findings and recommendations outlined in the Follow-up Draft Audit Report, ME08-059F, dated June 5, 2008. Rather than presenting a comprehensive treatment of the findings and recommendations, this response will highlight those with which the University takes issue.

Scope and Methodology

The auditors collected counseling logs, tutoring logs, and related documentation in order “to assess whether the sampled students received *adequate* [emphasis added] counseling and tutoring services.” Additionally, the auditors “reviewed the sampled students’ transcripts to identify those who were “at risk” of failing and to determine whether those students were referred to or obtained counseling and tutoring.”

The University posits that the auditors went beyond the scope of the audit and their area of expertise when they imposed their judgment to determine what is “adequate tutoring” and which students are “at risk.” The University contends that it is the responsibility of the six College Discovery Programs to determine counseling and tutoring requirements for their students. The requirements are outlined in the Program Academic Plans, Student Handbooks, and other Program communications. The auditors’ role should be to determine whether or not the Program follows the guidelines it promulgates. Instead the auditors made the judgment that all students by virtue of being enrolled in College Discovery are “at risk” and should thus be enrolled in tutoring. It is important to note that the term “at risk” has a connotative rather than a denotative meaning and is used to describe a variety of circumstances. This flaw in methodology will be discussed further in the response to specific findings and recommendations associated with the tutoring effort.

A second shortcoming in the methodology was to assume that the full extent of student use of support services and scope of Program interventions could be ascertained by reviewing specific, pre-determined documents rather than posing open-ended questions designed to reveal the information the auditors were seeking. For example, instead of asking directors to describe all activities used to monitor student progress, the auditors requested copies of the mid-semester monitoring reports; rather than determining the scope of academic interventions available to CD

students, the auditors primarily based their findings on what is recorded in the tutoring logs. Thus the resulting assessment does not reflect student attendance in college run tutoring centers, counseling contacts in group seminars, or address practices like end-of-semester probation review processes. It should be noted that it was never intended that tutoring be mandatory for all Program students, and, in fact, the funding stream for academic support services in College Discovery Programs could never cover the cost associated with tutoring all Program students. Thus, Programs perform triage: mandating academic support for a limited population, maximizing service delivery in various ways such as placing tutors in targeted class sections and appriizing students of non-CD academic support initiatives. All students are encouraged to use support services and give priority to their academic pursuits. It is notable that, despite the academic and financial deficiencies CD freshmen enroll with, their retention and graduation rates are consistently higher than those of non-program students. It is the University's position that CD support services together with this triage approach account for the comparatively high performance of CD students.

Counseling Findings and Recommendations

The University charged the CD directors at the three campuses visited to review the report findings and resulting tables and compare them with Program data, e.g. counseling logs, student folders, correspondence to students, etc. Each of the community colleges, Borough of Manhattan (BMCC), Kingsborough, and LaGuardia submitted a response. The responses are appended to this document.

The University believes that the auditors' recommendation that "CDPs could benefit from the establishment of minimum CUNY counseling and tutoring standards that would provide guidance to the CDPs and better enable CUNY to monitor their performance," is based on the faulty premise that Programs operate without minimum counseling standards and/or that the standards are not generally known. The University requires each Program to establish minimum guidelines for counseling contacts and to report them in the Academic Plan and other local publications. Having the counseling standards set Centrally for the sake of uniformity is not likely to improve outcomes. The University reviews the Academic Plans carefully and closely monitors student performance outcomes and the attainment of performance goals set by the Programs. The University intervenes if it deems practices or standards are insufficient to net desired results. For example, at one community college incoming CD freshmen took the Program's Introduction to College Life seminar during the pre-freshman summer program but had no group orientation in the fall semester. Retention rates suffered, and the University required the program to offer the course during the fall semester.

The audit findings do demonstrate a need to strengthen record keeping practices in the counseling units so that counselors record every student contact on the counseling logs. The attached response from Kingsborough in particular highlights this need as they found many contacts recorded in the student folders that were not reflected in the counseling logs. The student folders and counseling notes could not be submitted as evidence because the information they contain is privileged. In fiscal year 2007, the University sponsored the development of a counseling tracking system that is being piloted in the SEEK Program at New York City College of Technology. The University plans to make the software available to Programs that do not

currently have an electronic monitoring system. It should be noted that several years ago, CUNY attempted to mandate a standard counseling log. The project was a dismal failure. Like nations and corporations, universities have cultural norms. The cultural norm at CUNY dictates that effective change is best gained through collaboration and a review of campus driven goals, not from University mandates designed to homogenize college policies and practices.

Academic Support Findings

As stated previously, the University believes that the auditors exceeded their mandate when they extended their review to students who are not mandated to attend tutoring. Thus the University posits that the findings reported in Tables III and IV go beyond the scope of the audit and should not be included in the final audit report. Note, while all Program students are mandated to meet with their counselors a specific number of times each semester, depending on status, tutoring mandates vary. At Kingsborough and La Guardia the requirement is that students on academic probation and students taking developmental courses must receive tutoring. BMCC stipulates that probationary students attend tutoring. It should be noted that in CD Programs students enrolled in developmental courses frequently receive their tutoring from a tutor assigned to the skills class rather than through the tutoring center. In such cases the tutoring center logs won't reflect this service. The attached responses from the CD Programs outline specific discrepancies with the auditors' data.

In setting guidelines for tutoring, the colleges do not use the term "at risk." As late in the audit process as April 10, 2008, in an e-mail the University explained to one of the auditors how varied the use of the term "at risk" can be. Thus it is difficult to determine which of the many meanings the auditors adopted as the basis for selecting the population used to construct Tables V and VI. The Program responses address what they see as discrepancies.

Each professional class within Special Programs--directors, academic support coordinators, counselors--meets monthly under the leadership of the Office of Special Programs. A major focus of the council meetings is professional development and sharing best practices. The councils mount two professional conferences every other year. Topics covered and issues discussed center around how best to maximize limited resources and expand student use of support services. The University will continue to emphasize offering and requiring attendance in a wide range of academic support services.

Monitoring Student Progress

The University agrees that mid-semester progress reports are an excellent assessment tool and that end of the semester monitoring is, "often too late, as many students have already failed their courses by then." However, CD has not always been successful securing reports from faculty nor can CD Programs compel faculty compliance. Even at the College of Staten Island where the reports are requested college-wide, the University Registrar reports that faculty response is limited. The Office of Special Programs will consult with the University Provost to consider presenting mid-semester reports as part of the University's Campaign for Student Success in Fall 2008.

APPENDIX A

BOROUGH OF MANHATTAN COMMUNITY COLLEGE
COLLEGE DISCOVERY PROGRAM

COUNSELING:

Corrections - Table I:

References are made in the report that counselors did not indicate the reasons for their contact with students, relative to why they did not come in for counseling. While the counseling contact logs/monthly report forms identify the categories of reasons for student contacts, counselors are not expected to reveal in note format, the reasons for their outreach, but rather, the method of their outreach activity. In Table I, the audit report cites the frequency of counseling contact at BMCC as "Once per month for the first 30 credits, then twice per semester thereafter." The correct frequency for student contact is as follows, "*freshman students must meet with their counselor three times each semester for the first two semesters. Continuing students must meet with their counselor at least twice during each subsequent semester.*" - (Student Handbook, p 4: 2005-2007 Edition)

The number of enrolled sample students in Table I should be 22 and not the 23 reported. Three of the 25 sample students did not enroll or withdrew from the fall 2006 semester. Therefore, the number of the sample students in Table I, who did not access counseling in the fall 2006 semester should be reported as 7 and not the 8 cited in the audit report. Subsequently, the resulting percentage of sample students in Table I, who did not access counseling in the fall 2006 semester, should be 32% and not the 35% reported.

Corrections - Table II:

In Table II, the audit report cites the frequency of counseling contact at BMCC as "Once per month for the first 30 credits, then twice per semester thereafter." The correct frequency for student contact is as follow: "*freshman students must meet with their counselor three times each semester for the first two semesters. Continuing students must meet with their counselor at least*

twice during each subsequent semester." - (Student Handbook, p4: 2005-2007 Edition)

The number of enrolled sample students in Table II should be **19** and not the 21 reported. Six of the sample students did not enroll or withdrew from the spring 2007 semester. Therefore, the number of sample students in Table II who did not access counseling in the spring 2007 semester should be 9 and not the 11 reported. In addition to the counseling log (monthly report form), one of the sample students; _____, participated in the group counseling sessions of March 7th and 14th in the spring 2007 semester. The resulting percentage of sample students who did not access counseling in the spring 2007 semester should be 47% and not the 52% reported.

Omissions

Under "*Previous Recommendation #3*" - pages 5 - 6 of the audit report, the auditors state that the recommendation was not implemented. While data is provided in Table I and II as support to their claim on previous recommendation #2, no support is provided to substantiate their claim for recommendation #3. I offer the following as support that actions were taken by the "CDP official" to ensure that counselors document their attempts to follow up with students who do not come in for counseling as required. Firstly, the format of the counseling contact log - "Monthly Report Form" was revised since the 2003 audit, to now include a section where the outreach activities of counselors are recorded. In addition to revising the report form/contact log, counselors have been expected to and are constantly reminded to provide documentation of outreach activities with students who fail to initiate monthly contacts.

Since the 2003 audit, counselors have begun to engage in more intrusive outreach activities and are making phone calls, sending out email blasts and letters to delinquent students who do not show. *Students who fail to comply with the contact requirement* are referred by their counselor to the CDP Director, for suspension or termination from the program.

TUTORING:

Tutoring is offered to CDP students in a variety of subjects. Tutoring is a subset of the services provided by CDP and does not replicate the services made available by the college to all students. Therefore, in some instances, CD students may use other tutors that are available in

subject areas for general students. A letter is sent by the CDP director each semester, to all enrolled CD students, announcing the availability of all the services including tutoring. In addition, a letter is sent by the Academic Support Coordinator to enrolled CD students, reminding them of tutoring support and encouraging their utilization of the services. The college's video monitors are utilized to stream announcements of available academic, counseling and tutoring support. When students fail to keep their tutoring appointment, they are called by the tutor and a record (call log) is kept of the outreach activity. An e-mail is generated and sent to the student and their assigned counselor.

AT-RISK STUDENTS:

Students on academic and special probation are defined as "At-Risk." Each semester, the CDP holds a special series of workshops aimed at addressing students' skills and to help alleviate their adverse conditions. A letter is sent to all students on probation and special probation informing them of the workshops and their required attendance. A general session is held in week one, where students learn goal setting, determine causes for low academic performance and are taught how to calculate their GP A. The students are given options of a variety of workshops facilitated by the CDP counselors and advisors, in the second and third weeks of the series. Students who miss any workshop is notified immediately and warned of the jeopardy in which they have placed themselves. The probation students are also expected to sign an academic agreement outlining a plan of action which they will follow to take themselves off probation.

Corrections - Table V:

The number of enrolled sample students in Table V should be 21 and not the 23 reported. Four of the sample students did not enroll or withdrew from the fall 2006 semester.

Corrections - Table VI:

The number of enrolled sample students in Table VI should be 19 and not the 21 reported. Six of the sample students did not enroll or withdrew from the spring 2007 semester.

APPENDIX B

**Kingsborough Community College Response to
Follow-up Audit Report on the Operating
Practices of the
City University of New York College Discovery Program
ME08-059F**

May 7,2008

Scope and Methodology

- During the December 2007 audit when the auditors visited KCC they focused primarily on admission folders and counseling documentation. Auditors requested copies of "counseling logs, and related documentation" however, the copies of logs, and samples of form letters do not provide a comprehensive picture of the activities/services the program provided. Student's individual folders may also contain pertinent information relative to counseling and tutoring services provided by College Discovery (CD). In our review to inform our response to auditors findings, we looked at the folders of the 30 students initially listed.
- At KCC, due to space limitations, our services are provided at two separate offices (L516 & D213) and documentation is kept by both offices. Our review of the individual student files and supplemental instruction files revealed the existence of forms and information that further supports the services provided to CD students.
- Although the audit reports both aggregate (n=75) and disaggregate (n=25) findings. The KCC sample size is quite small when disaggregated < 25 during each semester.
- Of the 25 students sampled at KCC it is important to note that **13** were not registered during the Fall '06 and **10** were not registered during the Spring '07 resulting in a very reduced sample size, that is, 12 and 15 for the respective semester (we are uncertain which are the 25 students "randomly selected"). To inform our response to the audit report, we reviewed the folders of the 30 students initially listed and looked at all supplemental instruction and counseling documentation.
- As part of KCC response to the audit findings, we reviewed program files of the 30 students listed on the initial audit list (we are uncertain which are the 25 students "randomly selected") but believe documentation presented herein will support statements made in our response.

Kingsborough response to

FINDINGS

Item # 2 & #3 - "Students Do Not Fully Use Counseling Services"

- It is important to note that at KCC part of the standing operating procedure is that at the end of each semester the students' transcript is reviewed and GP A is noted to inform the outreach services that will be conducted at the beginning of the new semester.
- Our number of "students registered" differ slightly from auditors. Our records indicate 17 students registered during Fall '06 and 20 students during Spring 07 [Table I & Table II]
- Of the 17 students registered during Fall '06 only 3 had no contact with counselor (18%), 2 had at least one contact during the semester (12%) and 12 students had the required 2 or more contacts with counselor (71 %). Overall, 83% of students were seen by CD counseling services during the Fall '06 semester. [Table I & Table II]
- During Spring 07, of the 20 students registered 7 students had no contact with counselor (35%), one (1) student had only 1 contact (5%). However, 60% (n=12) of CD students had 2 or more contacts with their counselor during Spring '07.
- In addition to individual counseling, other modes of counseling services are also offered to CD students through the SD 10 (orientation) classes, and various workshops offered to students during the semester.
- It is important to note that due to issues of confidentiality counselors do not document extensive notes in students records regarding the "nature of contacts" only sufficient to substantiate that contact was made with student.

Item #4 - "Students Do Not Fully Use Tutoring Services"

- It is important to note that part of standard operating procedure at KCC College Discovery Program is that at the end of each semester the students' transcript is reviewed by the supplemental instruction coordinator (tutor) and GPA is noted. The

GP A forms the "indicator" to determine which students will need targeted outreach services. We use 2.0 as the baseline, since students below this GP A are considered on "academic probation" and may also stand to lose portions of their financial aid (Tap).

- KCC program keeps various documents on our supplemental instruction services. KCC tutoring log is only used for student to sign in when they report for services. In addition to the rosters that capture the walk-in students, at the end of each semester supplemental instructors prepare an instruction narrative on students that have kept standing appointments throughout the semester [copies attached]. If the student received any services during the semester, their name may appear on either of these forms.

Items #5 & 6

- At the beginning of both the Fall '06 and Spring '07 a massive mailing was conducted to All students in the program [roster and sample letter attached]. In addition a separate mailing was conducted for students eligible to take the CPE inviting them to attend workshops and follow-up calls were conducted to these students. These activities demonstrate the program's continuous efforts to engage students and have them take advantage of our services. [sample letter and roster attached]
- Because of the increased volume of students and limited instruction staff our tutoring services are primarily for students that are on "academic probation" and students taking developmental courses. Students who do not fall into these two groups, but seek our services are also assisted. Tutoring services are provided both as individual and group modes. Group mode may take the form of workshops, assistance with use of computers in our resource center, several student taking the same course meeting together with tutor. In addition, special workshops are offered for students preparing to take the CPE and ACT exams. If students are in "good academic standing" tutoring services are not required.
- With regard to statement that "no indication that tutoring sessions were ever scheduled," at KCC when tutoring sessions are scheduled a three-part form is completed and a copy is kept in the tutoring office. [Samples of form provided] More recently, a copy is now sent to the student's counselor to inform them that an appointment has been scheduled and for them to reinforce the services when student is seen by counselor.
- During Fall 2006, of the 17 students registered 8 received supplemental instruction (47%). There were 5 students (29%) who were in good academic standing and tutoring was not necessary. There were only 4 students (23%) where tutoring services were indicated and they did not receive it. Overall, of the 9 students who did not receive S.I. only 4 were considered "at risk"; 5 were in good academic standing.
- During the Spring 2007, of the 20 students that were registered for classes 7 received S.I. (35%). The remaining 13 students (65%) were in good academic standing and

S.I. was not required. In summary, there were no students during this semester that were in academic jeopardy who did not receive S.I. [A table of sampled students with GP A and services provided is attached.] There was one student who withdrew during the semester and was not counted.]

Items #7, 8 & 9 - "At Risk Students Do Not Fully Use CDP Services"

- Although supplemental instruction (S.I.) is not mandatory, at the beginning of each semester a mass mailing is conducted to All CDP students informing them about our supplemental instruction services. [list and sample letter attached]. Students considered "at risk" are particularly targeted (i.e. GP A <2.0, enrolled in developmental course). The S.I. log would not reflect this activity.
- KCC supports the definition of the "at risk" term used by the auditors however, with regard to the category of students who "... do not meet the minimum level of proficiency in a remedial class" some qualification need to be made. When considering "failing or non failing" as an indicator, it is important to note that an "R" grade in a developmental course is not the same as an "F" in a credit bearing course and does not indicate that student "fail class." The grading system in the developmental course is different. For example, a student may receive an R grade in English 93 (developmental) yet moves on to the next semester to take English 12 (credit bearing). Similarly, a student may receive an R grade in the Fall semester and receive a passing grade in the "module semester" which is considered part of the Fall semester (quirk in KCC semester system).
- KCC program considers students to be "at risk" or in need of tutoring services if taking developmental courses, or is on academic probation with a GPA below 2.0.
- At the end of Fall '06 of the "at risk students" [4 students with a GPA below 2.0], three (3) failed a course, but all were in subjects for which CD does not typically offer tutoring services (e.g. bio, philosophy, history).
- Considering "at risk" in terms of developmental courses, 6 students were in a developmental course 3 of which received S.I. (tutoring). Although only 3 of the students in developmental courses received S.I., none of these students failed courses. (Fall '06)
- At the end of Spring '07, 18 of the 20 students were in good academic standing and not in need of tutoring.
- with regard to the "at risk students" (n=5) [in developmental courses], three (3) did not receive tutoring, but none failed courses. (Spring '07)
- It is interesting to note that from Fall '06 to Spring 07 the GP A improved for the 4 students previously with below 2.0 GP A.

- All "at risk" students received 2 or more contacts with their counselor during Fall '06 and Spring '07 semesters.

Item # 10- "Counselors do not adequately monitor student progress"

- During each semester **progress report inquiries** are sent to the faculty for each course the student is taking to monitor their progress. Because this mailing consists of hundreds of correspondence, the program does not keep copies of each individual letter. The program does retain a sample of the letter and a list of students (i.e. student roster) for which inquiry was made. [mailing roster & sample attached] When faculty returns report, it is placed in student's folder and counselor conducts follow-up based on reports. Progress reports were found in 18 of the files we reviewed.

Overall a review of the sample for KCC students (n=30) revealed that 18 of the students had progress reports for the audit period (Fall '06-Spring '07). Nine (9) of the students were not registered for classes during either audit period, and there were only 3 students for which no reports were found. [A table of the breakdown of progress reports found in student folders is attached]

KCC response to "Overall Recommendations"

- Counselors and tutors will continue to conduct the massive mailings done at the beginning of each semester. Program will develop a "sanction letter" that will be used as a follow-up to initial letter sent to "at risk" students to notify them that if they do not come in for services they risk being removed from program.
- Counselors and tutors continue to document their contacts with the students. In addition program will be implementing an "access data base system" that will facilitate the program's ability to record and track the students use of CD services.
- Program will continue to follow the minimum standards set for CD students. However, at the beginning of the Fall '08 semester All CD students will receive a letter from the program reminding them of program expectations and standards.
- CD program will continue to mail out the mid-semester progress reports. In addition we will explore using a KCC cxRoster system which also documents when students have not been attending class.