



City of New York

OFFICE OF THE COMPTROLLER

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COMPTROLLER



MANAGEMENT AUDIT

Tina Kim

Deputy Comptroller for Audit

Audit Report on the Operating Practices
of the City University of New York's
Adult Literacy/GED Program

ME13-083A

November 22, 2013

<http://comptroller.nyc.gov>



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

John C. Liu
COMPTROLLER

November 22, 2013

To the Residents of the City of New York:

My office has audited the City University of New York (CUNY) to determine the adequacy of the operating practices of its Adult Literacy/General Educational Development (GED) Program. We audit programs such as this to determine whether they are being efficiently and effectively administered.

The audit concluded that the operating practices of CUNY's Adult Literacy/GED Program were generally adequate. CUNY provided Adult Literacy/GED instruction to over 7,000 students during Fiscal Year 2012. However, the audit identified some weaknesses relating to the administration of the Adult Literacy/GED Program. Specifically, CUNY inadequately tracked and measured student outcomes and lacked evidence that its program instructors met the educational background and training requirements. In addition, CUNY lacked a user's manual for its student information database.

To address these issues, the audit recommended, among other things, that CUNY: systematically track and measure overall student performance on GED exams; systematically track and measure students' post-exit outcomes; ensure that instructor files are maintained and that they contain evidence that the instructors are qualified to teach in the program and have received the required annual training; and ensure that a user's manual is developed and distributed to all program staff who use the student information database.

The results of this audit 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.

If you have any questions concerning this report, please e-mail my audit bureau at audit@comptroller.nyc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Liu".

John C. Liu

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CITY OF NEW YORK OFFICE OF THE COMPTROLLER MANAGEMENT AUDIT

Audit Report on the Operating Practices of the City University of New York's Adult Literacy/GED Program

ME13-083A

AUDIT REPORT IN BRIEF

This audit determined the adequacy of the operating practices of the City University of New York's (CUNY) Adult Literacy/General Educational Development (GED) Program. The primary scope of the audit was Fiscal Year 2012.

CUNY provides higher education to more than 272,000 degree-seeking students and over 218,000 adult and continuing education students. CUNY consists of 24 institutions: 11 senior colleges, seven community colleges, the Macaulay Honors College at CUNY, and five graduate and professional schools. Courses are taught by approximately 7,000 full-time faculty and nearly 12,000 part-time faculty.

The CUNY Adult Literacy/GED Program, which is implemented by the Divisions of Adult and Continuing Education at 14 CUNY colleges, offers classes to help New York City adults learn to speak, read, and write English with greater facility and to prepare for high school credentialing through the GED exam. The program, which provides instruction for over 7,000 students a year, is coordinated centrally by the Office of Academic Affairs.

For Fiscal Year 2012, funds totaling \$757 million were appropriated to be used by CUNY for operating expenses. The CUNY Adult Literacy/GED Program has been funded since 1984 through combined New York State Education Department (NYSED) and New York City resources. For Fiscal Year 2012, the Adult Literacy/GED Program had expenditures of approximately \$7 million. These expenditures were supported by approximately \$4.2 million (60 percent) in Workforce Investment Act (WIA) Title II (Adult Education and Literacy) funds received through NYSED and approximately \$2.8 million (40 percent) in funds received from the New York City Mayor's Office.

Audit Findings and Conclusion

The operating practices of CUNY's Adult Literacy/GED Program were generally adequate. However, the audit identified some weaknesses relating to the administration of the Adult Literacy/GED Program that should be addressed. Specifically, CUNY: inadequately tracked and

measured student outcomes; lacked evidence that its program instructors met the educational background and training requirements; and lacked a user's manual for the Adult Student Information System & Technical Support (ASISTS) database.

Audit Recommendations

To address these issues, the audit recommends, among other things, that CUNY should:

- Systematically track and measure overall student performance on GED exams.
- Systematically track and measure students' post-exit outcomes.
- Ensure that instructor files are maintained and that they contain evidence that the instructors are qualified to teach in the program and have received the required annual training.
- Ensure that a user's manual is developed and distributed to all program staff who use the ASISTS database.

Agency Response

In their response, CUNY officials accepted all of the audit's recommendations. They stated that they were pleased with the audit's overall conclusion that the program's operating practices were generally adequate; however, they acknowledged that there were opportunities for improvement as described in the report.

INTRODUCTION

Background

CUNY provides higher education to more than 272,000 degree-seeking students and over 218,000 adult and continuing education students. CUNY consists of 24 institutions: 11 senior colleges, seven community colleges, the Macaulay Honors College at CUNY, and five graduate and professional schools. Courses are taught by approximately 7,000 full-time faculty and nearly 12,000 part-time faculty.

The CUNY Adult Literacy/GED Program, which is implemented by the Divisions of Adult and Continuing Education at 14 CUNY colleges, offers classes to help New York City adults learn to speak, read, and write English with greater facility and to prepare for high school credentialing through the GED exam. The program, which provides instruction for over 7,000 students a year, is coordinated centrally by the Office of Academic Affairs.

For Fiscal Year 2012, funds totaling \$757 million were appropriated to be used by CUNY for operating expenses. The CUNY Adult Literacy/GED Program has been funded since 1984 through combined New York State Education Department (NYSED) and New York City resources. For Fiscal Year 2012, the Adult Literacy/GED Program had expenditures of approximately \$7 million. These expenditures were supported by approximately \$4.2 million (60 percent) in Workforce Investment Act (WIA) Title II (Adult Education and Literacy) funds received through NYSED and approximately \$2.8 million (40 percent) in funds received from the New York City Mayor's Office.

Objective

The objective of this audit was to determine the adequacy of the operating practices of CUNY's Adult Literacy/GED Program.

Scope and Methodology Statement

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

This primary scope of the audit was Fiscal Year 2012. Please refer to the Detailed Scope and Methodology at the end of this report for a discussion of the specific procedures followed and the tests conducted during this audit.

Discussion of Audit Results

The matters covered 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 September 23,

2013, and was discussed at an exit conference held on October 7, 2013. On October 28, 2013, we submitted a draft report to CUNY officials with a request for comments. We received a written response from CUNY on November 12, 2013. In their response, CUNY officials accepted all of the audit's recommendations. They stated that they were pleased with the audit's overall conclusion that the program's operating practices were generally adequate; however, they acknowledged that there were opportunities for improvement as described in the report.

CUNY's written response is included as an addendum to this report.

FINDINGS AND RECOMMENDATIONS

The audit determined that the operating practices of CUNY's Adult Literacy/GED Program were generally adequate. Specifically, CUNY provided Adult Literacy/GED instruction to over 7,000 students during Fiscal Year 2012. In addition, CUNY had the required written assessment policies and procedures that identify the student assessment tests to be used, when the tests are to be administered, and how the test scores are to be reported. Furthermore, CUNY uses the ASISTS database, an electronic record system, to document information on individual students.

However, the audit identified some weaknesses relating to the administration of the Adult Literacy/GED Program that should be addressed. Specifically, CUNY:

- inadequately tracked and measured student outcomes;
- lacked evidence that its program instructors met the educational background and training requirements; and
- lacked a user's manual for the ASISTS database.

These deficiencies are discussed in more detail in the following sections of this report.

Inadequate Tracking and Measuring of Student Outcomes

CUNY's tracking and measuring of Adult Literacy/GED student outcomes was inadequate. In addition, two of the three colleges in our sample did not consistently maintain complete student files.

According to the NYSED National Reporting System (NRS) Manual and the federal NRS Implementation Guidelines, there are five types of core outcome measures: educational gain; receipt of GED or secondary credential; post-secondary education or training; entered employment; and retained employment. These core outcome measures are to be used to evaluate program performance.

Educational gain provides a measure of student literacy improvement resulting from instruction. To determine the extent of educational gain, the students are first assessed during intake and then periodically assessed while they are receiving instruction to establish their levels of improvement. There are six levels for English as a second language (ESL), four for adult basic education (ABE), and two for adult secondary education (ASE). The *BEST Literacy* and *BEST Plus* tests are administered to assess the proficiency of adults enrolled in ESL classes. Tests of Adult Basic Education (TABE) are administered to all students seeking entry into the ABE and ASE programs. CUNY reports to NYSED the number of students at each college who passed one or more of these tests during a school year and thereby moved up to higher-level classes. This number is divided by the number of students in the program to arrive at the percentage of students who experienced an educational gain during the year. The other four core outcome measures that are used to evaluate performance relate to students who had identified the related outcomes as goals and had exited the program.

However, we identified a number of weaknesses in CUNY's tracking and measuring of Adult Literacy/GED student outcomes. For those students who had the goal of passing the GED exam and have exited the program, CUNY reports to NYSED (in accordance with NYSED

standards and definitions) whether they met this goal. However, CUNY did not adequately track how many of these students exited the program without meeting their GED goal. Until Fiscal Year 2013, unless a student formally exited the program, CUNY assumed that the student remained in the program. Only in Fiscal Year 2013 did NYSED begin to require that students who had more than 90 days of non-attendance be considered to have exited the program. As a result, it is not surprising that for Fiscal Year 2012, CUNY reported to NYSED that almost 100 percent of those students whose goal was to pass the GED exam did so before exiting the program because CUNY (as instructed by NYSED) was not counting those students who had informally left the program.

Although there is a concern that CUNY (by following NYSED instructions) might be underreporting the number of students who exit the program without meeting their GED goal, of greater concern is that CUNY does not systematically track overall student performance on the GED exams. CUNY does not track the pass/fail rates for students who take the exam in a given year. If a student takes the exam and fails, that failure is not noted for systematic tracking purposes unless the student exits the program after taking the exam. For those students who take the exam one or more times before passing it, only the passing results are noted for systematic tracking purposes. To determine the number of students at the colleges in our sample who passed or failed the GED exam in Fiscal Year 2012, we compared the list of students whose goal was to earn a GED certificate to the NYSED Prep Program Code Report, which lists all the students who took the GED exam and indicates whether they passed or failed. Table I shows the number of students at the three sample colleges who took the GED exams and the percentages of those who passed.

Table I

GED Exam Results
Fiscal Year 2012

| College | Number of Students with GED Goal Who Took the Exam | Number of Students with GED Goal Who Passed the Exam | Number of Students with GED Goal Who Failed the Exam | Percentage of Students Who Passed |
|-----------------------------|---|---|---|--|
| LaGuardia Community College | 42 | 22 | 20 | 52% |
| NYC College of Technology | 24 | 21 | 3 | 88% |
| City College of New York | 43 | 24 | 19 | 56% |
| Totals | 109 | 67 | 42 | |

These results give a more accurate representation of the program's effectiveness. However, as stated above, CUNY does not systematically track the number of students who fail the GED exam unless the student exits the program. This hinders CUNY's ability to evaluate the effectiveness of its efforts to prepare students for the exam.

In addition, CUNY did not systematically track and measure Adult Literacy/GED students' post-exit outcomes. The NRS Manual states that follow-up measures, such as surveys, could be used to collect data on students' post-exit outcomes. The information obtained by the survey could be used to evaluate the quality and effectiveness of the program. However, the colleges did not perform such surveys or use any other formal mechanism to track the students' post-exit outcomes. College officials stated that sometimes former Adult Literacy/GED students inform their instructors that they are in college or have a job. Some of the colleges also stated that they sometimes make telephone calls to the students to determine their outcomes. However, there was little evidence that the colleges documented the results of these limited contacts. More importantly, the lack of a systematic effort to determine students' post-exit outcomes limited the ability of the colleges to evaluate and improve the effectiveness of their Adult Literacy/GED Programs.

On a related matter, the Adult Literacy Compliance Self-Review/Monitoring Form indicates that an individual student record folder must be maintained and kept in a secured area. We selected a sample of 60 students (20 from each of the three randomly selected colleges) from the colleges' lists of students to determine whether for each student there was a complete file, which should include, among other things, the student's Individual Student Record Form. We were unable to locate a total of three student files, two at City Tech and one at LaGuardia. In addition, one file at City Tech was incomplete.

Recommendations

CUNY should:

1. Systematically track and measure overall student performance on GED exams.

CUNY Response: "We accept this recommendation.

"While student progress is tracked on the GED exams, starting immediately, a more adequate centralized reporting instrument will be implemented to demonstrate the tracking and measurement of student progress."

2. Systematically track and measure students' post-exit outcomes.

CUNY Response: "We accept this recommendation.

"All required non-academic secondary outcomes for students at the end of the reporting year are documented via an in-class survey and are entered in ASISTS. These are: obtained skills needed to pass US citizenship exam, registered to vote or voted for the first time, got involved in community activities, removed from public assistance, had public assistance reduced, got involved in children's education, and got involved in children's literacy activities.

"The four primary non-academic outcomes, entered employment, retained employment, entered post-secondary education/training, and obtained GED secondary school diploma are reported in ASISTS differently, per regulations.

"The category 'entered employment' can be reported while students are in the program and credit for entering employment is attributed to the college upon a student's exit from the program (per SED regulations). Students who exit the

program without a job, having had the goal of getting a job, are to be surveyed during the quarter following their exit from the program.

“With respect to the outcome of ‘retained employment’, students are surveyed per regulations during the third quarter following their exit from the program.

“The category of ‘entered post-secondary education/training’, can be reported while students are in the program and credit for this achievement is attributed to the college upon a student’s exit from the program, per regulations. For a student who had the goal of entering post-secondary education or training who exited the program without having initiated entry into post-secondary education or training, the program is permitted to survey the students until October 31 of the following year to determine if there is a positive outcome.

“The category of ‘obtained GED secondary school diploma’ is only reported upon achievement of the diploma and is attributed to the college upon a student’s exit from the program, per regulations. October 31 of the following year is the deadline by which to report that students have achieved their GED diploma.

“To determine achievement of all of the above outcomes, in-class and post-participation phone and email surveys are conducted, as required, per category of outcome. The program will make greater efforts to reach students after they have left the program to determine their status with respect to the various categories. Starting immediately, documentation of efforts to reach the students will be more rigorously undertaken at all campuses.”

Auditor Comment: This audit did not review the non-academic secondary outcomes for students because, according to the NRS Implementation Guidelines, these are optional measures and states are not required to report on them. For the four primary outcomes, however, CUNY provided no evidence that the colleges performed any post-participation surveys or used any other formal mechanism to track the students’ post-exit outcomes.

3. Ensure that the colleges maintain complete files for all of the students in the program.

CUNY Response: “We accept this recommendation.

“Inasmuch as three files in the auditors sample were found to be missing and one file was found to be incomplete, procedures will be reviewed to ensure that the files of all students are complete.”

Insufficient Evidence That Program Instructors Met Educational Background and Training Requirements

The NYSED Office of Adult Career and Continuing Education Services requires that each instructor in WIA Title II-funded programs receive, at a minimum, 10 hours of staff development training per year. CUNY officials stated that most training is provided by the Literacy Assistance Center, a non-profit organization that provides professional development for adult literacy programs in New York City. CUNY officials also stated that reports of instructor training should

be sent to the colleges to confirm the training. During Fiscal Year 2012, for the three colleges in our sample, we determined that there were a total of 103 instructional staff in the Adult Literacy/GED Program. However, these three colleges did not maintain any supporting documentation to verify that the instructors had received the required training.

WIA Title II, Section 223(a)(E), states that an “adult education teacher...[should] have at least a bachelor’s degree.” According to CUNY officials, CUNY requires all of its instructors to have a Bachelor’s degree or higher as well as appropriate relevant experience. The three colleges in our sample did not maintain personnel files for their instructors. Hiring files were maintained by the Research Foundation, which handles various administrative matters for CUNY colleges. We reviewed the hiring files for a sample of 15 of the 103 Adult Literacy/GED instructional staff at the three sampled schools. Fourteen of the 15 instructional staff were instructors, and one was a proctor for whom a Bachelor’s degree was not required. Of the 14 instructors in our sample, 10 had stated on either their employment applications or on their résumés that they had at least a Bachelor’s degree, but for the remaining four instructors, there was no evidence in the hiring files that they had earned Bachelor’s degrees. Subsequent to the exit conference for this audit, we were provided with résumés for three of the instructors indicating that they had earned Bachelor’s degrees and a copy of a Master’s degree diploma for the fourth instructor. For all 14 instructors, however, there was no evidence that CUNY had verified the degrees with the schools at which the instructors had purportedly earned them.

By not ensuring and documenting that its program instructors meet the relevant educational background and training requirements, CUNY is not ensuring that its Adult Literacy/GED students are being taught by qualified instructors. On a related matter, there was no evidence that CUNY formally evaluates the performance of its Adult Literacy/GED instructors. Performance evaluations would provide feedback and guidance to these instructors on how they could improve the quality of their teaching

Recommendations

CUNY should:

4. Ensure that instructor files are maintained and that they contain evidence that the instructors are qualified to teach in the program and have received the required annual training.

CUNY Response: “Starting immediately, every teacher file will contain evidence that instructors are qualified to teach in the program, either through a copy of their bachelor's degree diploma or a more advanced degree. Every teacher file will provide evidence of the required annual training.”

5. Ensure that the colleges regularly evaluate instructor performance.

CUNY Response: “We accept this recommendation.

“Starting in January 2014, teachers will be evaluated regularly, and evidence of the evaluation will form part of the teacher's file.”

Lacked User's Manual for the ASISTS Database

CUNY uses the ASISTS database to record information about the students in the Adult Literacy/GED Program. However, CUNY officials informed us that while they do not have a user's manual for the ASISTS database, they are currently working on developing one. A user's manual would be useful for training new staff and for ensuring that all of the colleges follow the same procedures and standards.

Recommendation

6. CUNY should ensure that a user's manual is developed and distributed to all program staff who use the ASISTS database.

CUNY Response: "We accept this recommendation with the following explanation:

"The creation of a user's manual is the purview of the Literacy Assistance Center (LAC) which holds the contract with the New York State Education Department to manage the ASISTS database. It is our understanding that such a manual is being written. Once it is completed, it will be distributed to all program staff who use the ASISTS database. Currently, all staff who use the database are required to attend training at the LAC and at CUNY Central."

DETAILED SCOPE AND METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The primary scope period for the audit was Fiscal Year 2012.

To achieve the audit objective, we reviewed applicable laws and regulations, including the Workforce Investment Act of 2012, Title II – Adult Education and Literacy. We also reviewed NYSED’s National Reporting System (NRS) Manual, which presents NYSED policies and procedures and recommends best practices for local programs. In addition, we reviewed the federal NRS Implementation Guidelines, which presents the accountability requirements for the federally funded, State-administered adult education program.

To gain an understanding of the Adult Literacy/GED Program, we reviewed CUNY’s Written Assessment Policy and interviewed CUNY officials, including the Associate Dean for Continuing Education and the Director of Language and Literacy Programs. In addition, we reviewed the Adult Literacy Compliance Self-Review/Monitoring Forms and interviewed the program managers at the colleges to obtain descriptions of the procedures they follow in administering the program. We also met with the Data Systems Manager to understand the information system used in administering the program.

To understand the financial aspects of the program, we reviewed Research Foundation’s (RF) Financial Internal Control Procedures and Procurement Policy. In addition, we interviewed RF’s Director of Fiscal and Administrative Services and its Director of Internal Audit. From the RF and the colleges in our sample, we requested lists of the other than personal service (OTPS) expenses for the program during Fiscal Year 2012. We compared the RF’s list of OTPS purchases at these three schools to the colleges’ lists of OTPS purchases to determine whether the items purchased and the amounts paid were consistently reported. The three colleges had a total of 120 small purchases totaling \$46,023. All of these purchases were below the threshold amount of \$5,000 stipulated by the RF’s Procurement Policy as the level above which more stringent purchasing rules apply.

We obtained a list of the 14 colleges that participated in the program during Fiscal Year 2012. They consisted of six of the seven community colleges and eight of the 11 senior colleges. (The 11 senior colleges include three comprehensive colleges that offer both Associate’s and Bachelor’s degrees. Each of these three comprehensive colleges participated in the program.) For our review, we randomly selected one community college – LaGuardia Community College, one senior college – City College of New York, and one comprehensive college – New York City College of Technology, for a total of three colleges.

On January 17, 2013, CUNY provided us with a list of 7,139 students who participated in the Adult Literacy/GED Program at the 14 colleges during Fiscal Year 2012. For the three colleges

in our sample, there were 639 Adult Literacy/GED students at LaGuardia Community College, 620 at City College of New York, and 646 at New York City College of Technology.

We randomly selected a sample of 60 (20 from each of the three randomly selected colleges) from the colleges' lists of students to determine whether for each student there was a complete file, which should include, among other things, the student's Individual Student Record Form.

To determine whether CUNY tracked student outcomes, we interviewed college officials and reviewed student files for evidence that the students had achieved certain outcomes. In addition, from the student lists for the three colleges in our sample, we identified those students whose goal was to earn a GED Certificate. To determine whether these students passed the GED exam, we reviewed the NYSED Prep Program Code Report, which lists all the students who took the GED exam and indicates whether they passed or failed.

To determine whether the Adult Literacy/GED instructors and staff paid by RF during Fiscal Year 2012 actually worked on the program, we compared RF payroll information to the lists of Adult Literacy/GED instructors and staff we received from the 14 colleges that participated in the program. We obtained explanations from college Adult Literacy/GED officials about any discrepancies we found between the RF and college data.

In addition, we randomly selected 14 instructors from the three colleges in our sample and reviewed their files to determine whether there was evidence that they had Bachelor's degrees, had received the required staff development training, and had been regularly evaluated.

The results of the above tests, while not statistically projected to their respective populations, provide a reasonable basis for us to assess the adequacy of the operating practices of CUNY's Adult Literacy/GED Program.



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November 12, 2013

Ms. Tina Kim
Deputy Comptroller for Audits
The City Of New York
Office of the Comptroller
1 Centre Street Room 1100
New York, NY 10007-2341

Re: CUNY Adult Literacy/GED Program Draft Audit Report# ME13-083

Dear Deputy Comptroller Kim:

We have reviewed the above-titled draft audit report and the findings and recommendations contained therein. We are pleased with the auditor's overall conclusion that the program's operating practices are generally adequate; however, we acknowledge that there are opportunities for improvement as described in the report. The following represents the program administration's response to the auditors' recommendations:

Recommendation 1:

Systematically track and measure overall student performance on GED exams.

Response 1:

We accept this recommendation.

While student progress is tracked on the GED exams, starting immediately, a more adequate centralized reporting instrument will be implemented to demonstrate the tracking and measurement of student progress.

Recommendation 2:

Systematically track and measure students' post-exit outcomes.

Response 2:

We accept this recommendation.

All required non-academic secondary outcomes for students at the end of the reporting year are documented via an in-class survey and are entered in ASISTS. These are: obtained skills needed to pass US citizenship exam, registered to vote or voted for the first time, got involved in community activities, removed from public assistance, had public assistance reduced, got involved in children's education, and got involved in children's literacy activities.

The four primary non-academic outcomes, entered employment, retained employment, entered post-secondary education/training, and obtained GED secondary school diploma are reported in ASISTS differently, per regulations.

The category "entered employment" can be reported while students are in the program and credit for entering employment is attributed to the college upon a student's exit from the program (per SED regulations). Students who exit the program without a job, having had the goal of getting a job, are to be surveyed during the quarter following their exit from the program.

With respect to the outcome of "retained employment", students are surveyed per regulations during the third quarter following their exit from the program.

The category of "entered post-secondary education/training", can be reported while students are in the program and credit for this achievement is attributed to the college upon a student's exit from the program, per regulations. For a student who had the goal of entering post-secondary education or training who exited the program without having initiated entry into post-secondary education or training, the program is permitted to survey the students until October 31 of the following year to determine if there is a positive outcome.

The category of "obtained GED secondary school diploma" is only reported upon achievement of the diploma and is attributed to the college upon a student's exit from the program, per regulations. October 31 of the following year is the deadline by which to report that students have achieved their GED diploma.

To determine achievement of all of the above outcomes, in-class and post-participation phone and email surveys are conducted, as required, per category of outcome. The program will make greater efforts to reach students after they have left the program to determine their status with respect to the various categories. Starting immediately, documentation of efforts to reach the students will be more rigorously undertaken at all campuses.

Recommendation 3:

Ensure that the colleges maintain complete files for all of the students in the program.

Response 3:

We accept this recommendation.

Inasmuch as three files in the auditors sample were found to be missing and one file was found to be incomplete, procedures will be reviewed to ensure that the files of all students are complete.

Recommendation 4:

Ensure that instructor files are maintained and that they contain evidence that the instructors are qualified to teach in the program and have received the required annual training.

Response 4:

Starting immediately, every teacher file will contain evidence that instructors are qualified to teach in the program, either through a copy of their bachelor's degree diploma or a more advanced degree. Every teacher file will provide evidence of the required annual training.

Recommendation 5:

Ensure that the colleges regularly evaluate instructor performance.

Response 5:

We accept this recommendation.

Starting in January 2014, teachers will be evaluated regularly, and evidence of the evaluation will form part of the teacher's file.

Recommendation 6:

CUNY should ensure that a user's manual is developed and distributed to all program staff who use the ASISTS database.


Response 6:

We accept this recommendation with the following explanation:

The creation of a user's manual is the purview of the Literacy Assistance Center (LAC) which holds the contract with the New York State Education Department to manage the ASISTS database. It is our understanding that such a manual is being written. Once it is completed, it will be distributed to all program staff who use the ASISTS database. Currently, all staff who use the database are required to attend training at the LAC and at CUNY Central.

Thank you for the opportunity to respond to the draft report. Please contact me if you need additional information.

Very truly yours,


Gordon Taylor
Director

cc: Interim Chancellor William P. Kelly
Executive Vice Chancellor Alexandra W. Logue
Senior University Dean John Mogulescu
University Dean Suri Duitch
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