

>> Juan Sanchez: Hello. My name is Juan Sanchez and I'm a consultant in the Adult Education Office. Some of you may be familiar with me because I'm responsible for Region or the Central Valley, if you will. In addition, I'm the categorical program monitoring Home Coordinator for the Adult Education Office at the California Department of Education, CDE. Joining me is Karen Norton.

>> Karen Norton: I'm also a consultant in the Adult Education Office. I'm responsible for a region which covers the Bay Area. And I'm also the lead consultant for innovation and alternative instructional delivery programs.

>> Juan Sanchez: The agenda for today's presentation consists of three main topics: a very brief overview of the monitoring in the Adult Education instrument, a longer discussion regarding the most common items of non-compliance and some reasons for non-compliance. Finally, we'll conclude this presentation by providing you with some valuable resources. Education Code 52522.2 states that the California Department of Education will monitor the compliance of Adult Schools in California by periodically reviewing Adult Schools. We have the ability to improve our delivery systems to ensure that California's adult learners are being provided with the tools to succeed in life. In addition, by working together with local education agencies, we can also ensure that Adult Education in California continues to address the needs of the evolving society that brings with it unique cultural and educational needs for its adult learners.

>> Karen Norton: Like all of the other programs, the Adult Education instrument is divided into seven dimensions. The Adult Education instrument consists of seventeen items spread across these seven dimensions. One important distinction within the Adult Education instrument is that for local education agencies or LEAs with only state-funded programs, only the items labeled State programs apply. Or LEAs that receive both State Education and Federal Literacy Civic Education grant funding, both State and Federal items apply. This is a key distinction because the breadth of the review is directly correlated to the funding sources in the corresponding program requirements. Education Code 52616.4 specifies that money in the Adult Education fund of a school district may be expended only for direct instructional and direct support cost. Furthermore, it is the intent of the legislature to ensure that responsible school district officials be held fully accountable for the accounting and the recording of Adult Education state-funded programs.

>> Juan Sanchez: The expenditure of Workforce Investment Act, WIA, Title II, Federal grant fund is authorized in the budget act through line item 61101560890. We at Title II Grant Funds provide supplemental funds for adult basic education, high school subjects, English as a Second Language, ESL, citizenship, and English literacy in civic education, EL Civics, thereby enabling adults to become employable, productive, and responsible citizens, workers and family members. Next, we'll take a look at both State and Federal compliance monitoring items. Due to our time constraints, rather than going item by item, we'll take a detailed look at a State item and also a Federal item. By walking through

both types of items and pointing out key components, you'll have the knowledge and tools to explore other items in more detail because all of the items in the Adult Education instrument are arranged in the same manner and are subject to the same standards.

>> Karen Norton: Here we have State Program Item II-AE 2. As you can see, this item makes clear that we are referring to state-funded programs. This particular item deals with classes and courses that are offered by LEAs. A short summary of the key legal components is included. And more importantly, a detailed citation of the applicable education code statutory requirements is provided. By providing the education codes citations, LEAs have the ability to look up the full text of the law in the event that additional clarification or detail is desired. In addition to the Education Code Item 2.1, it's grounded in regulation. Therefore, the applicable California Code of Regulations citation is provided. The reason that full citations are not included in this instrument is that inserting all of the education code and regulatory language in the instrument would make the instrument exceedingly long and cumbersome to work with. Now, we will take a look at the evidence that is required for II-AE 2. The document review is a major component of the compliance review. As you can see, there is a variety of evidence that is reviewed as part of the compliance review, including applicable board policies and an A-22 course approval request. Remember, an A-22 course approval must be submitted and approved yearly by the State Superintendent of Public Instruction or designate. In addition to the document review, you will note that interviews are a significant part of the review. Depending on the nature of the item and corresponding information necessary to determine compliance, various staff members may be interviewed. For this item, the LEA would be expected to have administrators, curriculum coordinators, and teachers available for questions. Finally, there is the observation portion of the item. In this item, observation is limited to the classes claiming a portion of it. Therefore, students and teachers in these classes should expect a visit from the CDE consultant conducting the compliance review. Once all of the evidence has been gathered and reviewed, the CDE consultant will make a determination whether the LEA meets the requirements or does not meet the requirements. If the LEA does not meet the requirements, a finding would be noted, discussed with the Adult Education Program Administrator and a full, more detailed write-up would be provided at the exit conference.

>> Juan Sanchez: Now, let's take a look at a Federal program item. As you can see, Item I-AE1 makes clear that we're referring to federally-funded programs. In addition, like the State item we just reviewed, it provides the applicable Federal citations. In reviewing the evidence portion for Item I-AE1, you'll note that Federal items are organized in the same manner as State items. Like the State items, there's a variety of evidence to be reviewed. One thing to note is that in instances where evidence may overlap with State items, to the extent possible, both State and Federal items are covered at the same time. This minimizes the time that LEA staff must be available to respond to questions or requests for information. For example, if both the Federal and State item will call for interviewing an administrator, both items can be covered in one interview. Like the State item, any findings of non-compliance would be summarized in the finding space and if it does not meet requirements, a box would be checked. Also, you'll notice that there is a box for

items that are not reviewed. This box would be checked if the LEA does not have a Federal grant program.

>> Karen Norton: Next, we'll take look at the most common items of non-compliance for Adult Education. The items are II-AE2, item II-AE4, item III-AE5, item III-AE6, and item VII-AE16. Reasons for non-compliance can vary from not being able to produce a piece of evidence to providing evidence that is either obsolete or incorrect. The good news is that all these items can be typically resolved within the initial 45-day resolution period. In the instances where more time is required, however, a compliance agreement could be negotiated.

>> Juan Sanchez: One of the more common reasons for finding item II-AE out of compliance is because LEAs are missing a course on their list of approved courses. This is often due to needed program changes throughout the year which are not reflected in the approved course list. For example, when a course is added mid-year, a re-approved request must be submitted if this course is not on the existing A22 course approval. Re-approved request can be done as necessary throughout the year. A common reason for LEAs to be out of compliance with respect to course outlines is due to the absence of one or more course outlines for the classes that the Adult Education program offers. Please remember that course outlines in all approved subjects must be on file for review. Here's a partial sample of an A22 course approval letter. LEAs are notified via e-mail that their courses have been approved. A copy of the approval letter in pdf format is attached to the e-mail. In addition, prior approval letters are on file and can be downloaded by logging on to your user account. Here's a partial sample of a course outline for general science. There are a number of sample course outlines available online, particularly for course subjects. Attempts have been made to provide first-rate samples, and while many of them contain a tremendous amount of detail, we acknowledge that LEAs' specific needs may not be addressed. Therefore, LEAs can customize course outlines to ensure that the unique needs of their program and community are captured. Sample course outlines can be accessed at the Adult Education website which will be provided at the conclusion of this presentation. In addition, LEA can contact their CDE Adult Education regional consultant if they have more detailed questions or would like additional support.

>> Karen Norton: LEAs are typically out of compliance for item II-AE because they cannot demonstrate that they have sufficient administrative oversight pursuant to the average daily attendance requirements. For example, if an LEA increases from an ADA to ADA, instead of a half of one administrative for the LEA, it would be required to have one fulltime administrative for its Adult Education program. A key provision also applies when the Adult Education program generates a hundred units of ADA because one this amount of ADA is exceeded, a separate adult school must be established.

>> Juan Sanchez: One of the common reasons for item III-AE to be out of complaint is because there's not a current attendance accounting approval letter or letters on file. Each Adult Education program must have on file separate approvals for seat time, lab and independent study attendance accounting. In addition, if there's been a major change

since the last approval letter, this change must be reflected in the approval letter. Otherwise, the Adult Education program will be out of compliance. For example, if a laboratory class was added that requires minute-by-minute accounting, if independent, was added as a mode of delivery or if there was a change in attendance offenders. Here's a sample of attendance accounting approval. Please note that regular seat time classes, lab classes, and independence study must have separate approvals, although they may all appear in the same letter. Also please note that CDE consultant, this can comment reviews and approves all attendance accounting requests.

>> Karen Norton: Next, we'll move on to item III-AE6. Typically LEAs are out compliance for this item because they exceed the approved statewide Adult Education indirect cost rate, or ICR. Remember, the ICR for Adult Education cannot exceed the approved statewide Adult ICR. Here's a screen shot of the statewide ICRs for Adult Education and for its food service. As you can see, like district ICRs, the statewide adult ICR is calculated each year.

>> Juan Sanchez: A common reasons for a lack of compliance on these items is that LEAs do not have counseling records or documentation for all concurrently enrolled high school students. Based on the provisions of Education Code 52500, all concurrently enrolled high school students must have a documented counseling session. Therefore, if some or none of the concurrently enrolled high school students in the Adult Education program have a counseling record, the LEA would non-complaint. This concludes our brief presentation. Before we go, however, please take note of the following important resources.