

## Internal Audit Report



# Adult ESOL Program



The District's Adult ESOL program is generally compliant, efficient and effective when compared to other large school districts' programs in the State of Florida. However, some improvements are needed in recordkeeping.

January 2008

# THE SCHOOL BOARD OF MIAMI-DADE COUNTY, FLORIDA

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Ms. Perla Tabares Hantman, Vice Chair  
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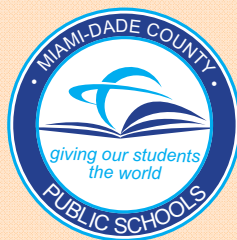
Mr. Allen M. Vann, CPA  
Chief Auditor  
Office of Management and Compliance Audits

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Mr. Trevor L. Williams, CPA







# Miami-Dade County Public Schools

*giving our students the world*

**Superintendent of Schools**  
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Dr. Solomon C. Stinson

January 23, 2008

Members of The School Board of Miami-Dade County, Florida  
Members of The School Board Audit Committee  
Dr. Rudolph F. Crew, Superintendent of Schools

Ladies and Gentlemen:

In accordance with the approved Audit Plan for the 2007-08 Fiscal Year, we have performed an audit of the Adult English for Speakers of Other Languages (ESOL) program for the period of July 1, 2006 through June 30, 2007. The objectives of the audit were to determine whether the Adult ESOL program operates efficiently and effectively and enrollment data and performance measures used in the program are reliable. Further, the audit endeavored to determine if the program complied with applicable laws, rules, policies and procedures.

During Fiscal Year 2006-07, the District enrolled 36,520 Adult ESOL students. For FY2006-07, the State appropriated \$105 million to the Adult General Education Program, of which the Adult English for Speakers of Other Languages (ESOL) program is a component.

Our audit concludes that the District's Adult ESOL program is efficient and effective. The program ranked third among the seven largest school districts' programs in the State when benchmarking the standardized measure of efficiency and effectiveness. The Adult ESOL program's enrollment data and performance measures are overall reliable. The program's administration and school site staff generally complied with applicable laws, rules, policies and procedures. However, our audit found deficiencies at two (2) of the 20 adult education centers (AEC) relating to students' test scores. Additionally, the process of documenting that students are properly receiving free services needs improvement.

Our findings and recommendations were discussed with management. We have received responses to our findings and recommendations from management. As always, we would like to thank the management for their cooperation and the courtesies extended to our staff during the audit.

Sincerely,

Allen M. Vann, CPA  
Chief Auditor

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## **EXECUTIVE SUMMARY**

Our audit concludes that the District's Adult ESOL program is generally efficient and effective. The program ranked third among the seven largest school districts' programs in the State when benchmarking the standardized measure of efficiency and effectiveness – Literacy Completion Points to Full-Time Equivalent (LCP-to-FTE) ratio. The Adult English for Speakers of Other Languages (ESOL) program's enrollment data and performance measures are reliable overall. These two variables drive the State of Florida's funding of the program. The program's administration and school site staff complied with applicable laws, rules, policies and procedures governing student attendance and withdrawal practices, instructor payroll and teacher certification.

Our audit found deficiencies at two (2) of the 20 adult education centers (AEC) relating to the process of administering and retaining student test documentation used to determine the school's performance. Additionally, the process of properly completing and retaining the Data Input Sheet used, in part, to ensure students who are receiving free services are Florida residents, needs improvement.

Based on our observations, we made two (2) recommendations. We have received responses to our findings and recommendations from management and have incorporated them in our report. The detailed findings and recommendations start on page six (6) of this report and provide additional information that is integral to understanding the substance and context of the conditions noted above.

## INTERNAL CONTROLS

Our overall evaluation of internal controls for the Adult ESOL program is summarized in the table below.

INTERNAL CONTROLS RATING			
CRITERIA	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE
Process Controls	X		
Policy & Procedures Compliance		X	
Effect	X		
Information Risk	X		
External Risk	X		

INTERNAL CONTROLS LEGEND			
CRITERIA	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE
Process Controls	Effective	Opportunities exist to improve effectiveness.	Do not exist or are not reliable.
Policy & Procedures Compliance	In compliance	Non-Compliance Issues exist.	Non- compliance issues are pervasive, significant, or have severe consequences.
Effect	Not likely to impact operations or program outcomes.	Impact on outcomes contained.	Negative impact on outcomes.
Information Risk	Information systems are reliable.	Data systems are mostly accurate but can be improved.	Systems produce incomplete or inaccurate data which may cause inappropriate financial and operational decisions.
External Risk	None or low.	Potential for damage.	Severe risk of damage.

## BACKGROUND

The Adult English for Speakers of Other Languages (ESOL) program is a component of the Adult General Education Program, which is in turn a part of the District's Workforce Development Education Program. Section 1004.93, Florida Statutes authorizes the Adult General Education Program. The State funds the District's Workforce Development Education Program pursuant to the General Appropriations Act. The District was allocated approximately \$105 million for FY 2006-07. Although the State's formula for funding Adult ESOL and other Adult Education programs is in the process of being modified, in the past it has been based primarily on enrollment and secondarily on standardized performance measures. Enrollment and performance will likely continue to be the main determinants for funding to the District. The Adult ESOL program comprises the following courses:

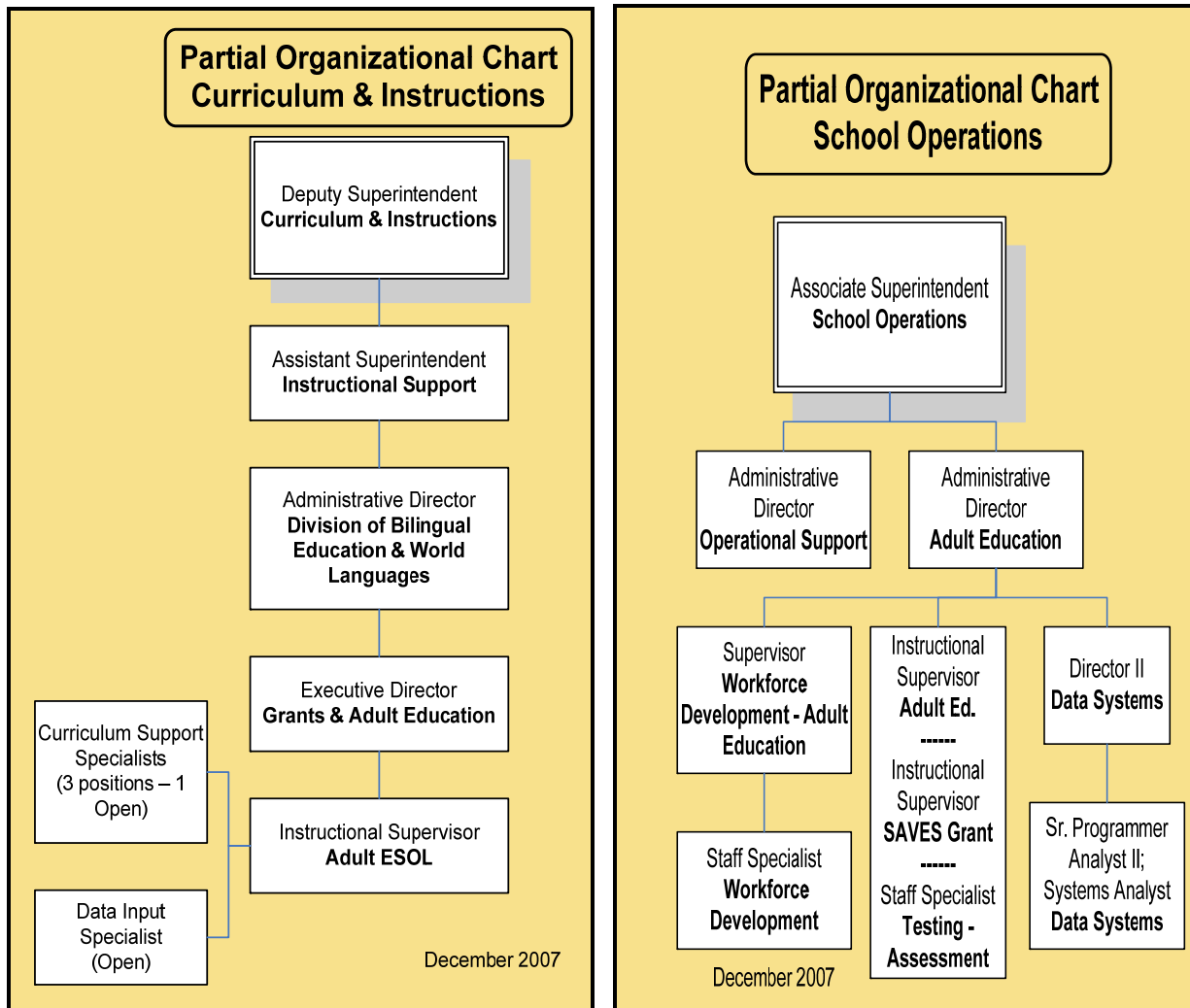
- Adult English Literacy (Course #9900040) - Six levels
- Literacy for Adult ESOL Learners (Course #9900300) - Three levels
- English Literacy for Career and Technical Education (Course #9900050) - Three levels
- English Literacy Academic Skills (Course #9900051)
- Workplace Readiness Skills for the LEP Adult (Course #9900080)
- Citizenship (Course #9900090)

During Fiscal Year 2006-07, the District enrolled 36,520 Adult ESOL students for a total of 5,337,198 classroom hours. During that year, Adult ESOL students earned 13,358 LCP's. In June 2007, the District had 549 adult ESOL instructors. The Adult ESOL courses are offered during three trimesters per year at the following 20 adult education centers (AEC) and their satellite locations:

- |                                    |   |
|------------------------------------|---|
| • American Senior High Adult Ed.   | • Miami Palmetto Adult Ed.              |
| • Coral Gables Adult Ed.           | • Miami Senior Adult Ed.                |
| • D.A. Dorsey Educational Center   | • Miami Springs Adult Ed.               |
| • The English Center               | • Miami Sunset Adult Ed.                |
| • Hialeah High Adult Ed.           | • North Miami Adult Ed.                 |
| • Hialeah Miami Lakes Adult Ed.    | • Robert Morgan Educational Center      |
| • Lindsey Hopkins Technical Center | • South Dade Adult Ed.                  |
| • Miami Beach Adult Ed.            | • Southwest Adult Ed.                   |
| • Miami Coral Park Adult Ed.       | • William H. Turner Technical Adult Ed. |
| • Miami Jackson Adult Ed.          |   |
| • Miami Lakes Educational Center   |   |

Operational issues of the Adult ESOL program are managed by School Operations – Department of Adult and Community Education (DACE), whereas curriculum issues are overseen by Bilingual Education – Adult ESOL, within Curriculum and Instructions.

The main standardized performance measure of an Adult ESOL program's efficiency and effectiveness is the Literacy Completion Point (LCP). A LCP is earned when a student passes a standardized test and other progress measures, which allows him/her to move to a higher ESOL competency level.





## **OBJECTIVES, SCOPE AND METHODOLOGY**

In accordance with the approved audit plan for FY2007-08, we performed an audit of the District's Adult ESOL program. The objectives of the audit were to answer the following questions:

1. Are the Adult ESOL program operations efficient and effective?
2. Are the Adult ESOL enrollment data and performance measures reliable?
3. Are applicable laws, rules, policies and procedures being complied with?

The scope of our audit covered operations during the period of July 1, 2006 through June 30, 2007. However, certain tests were performed on information for periods beginning earlier. Procedures performed to satisfy the audit objectives were as follow:

- Interviewed District's and Florida Department of Education's Staff.
- Reviewed operating policies and procedures, School Board rules and Florida Statutes.
- Examined, on a sample basis, evidence supporting eligibility of adult ESOL students for free course enrollment.
- Observed a sample of Adult ESOL courses in session on an unannounced basis.
- Inspected, on a sample basis, documentation supporting the award of LCP's.
- Benchmarked the operations of M-DCPS' Adult ESOL program with that of other Florida school districts' Adult ESOL programs.
- Reviewed documentation and observed instructors' classroom presence evidencing the propriety of instructors' payroll and certification.
- Reviewed documentation and observed students' classroom presence evidencing the propriety of students' attendance and withdrawal practices.
- Examined, on a sample basis, documentation evidencing the proper enrollment of students.
- Performed various other audit procedures as deemed necessary.

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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit included an assessment of applicable internal controls.

## FINDINGS AND RECOMMENDATIONS

### 1. THE M-DCPS ADULT ESOL PROGRAM IS GENERALLY EFFICIENT AND EFFECTIVE

#### **Highlights of Finding:**

M-DCPS Adult ESOL program ranked third of the seven largest school districts' programs in Florida and is generally efficient and effective based on the LCP-to-FTE benchmarked ranking.

The M-DCPS Adult ESOL program is generally efficient and effective based on our benchmarking with other large Adult ESOL programs in the State of Florida, and other related testing performed. As the table below shows, M-DCPS Adult ESOL program ranked third of the seven largest school district programs in Florida. We used standardized performance data compiled by the DOE for FY2005-06 to calculate an "LCP-to-FTE" ratio for each of the seven programs benchmarked. A Literacy Completion Point (LCP) is earned when a student passes a standardized test or other progress measure, which allows them to move to a higher ESOL competency level. A Full-Time Equivalent (FTE) is equivalent to the number of student classroom hours divided by 900. The more LCP's earned per student FTE, the higher the LCP-to-FTE ratio and the more efficient and effective a school district's Adult ESOL program is deemed.

FY2005-06 LCP-to-FTE Ratio (Seven Largest Adult ESOL Programs in Florida)				
District	LCP-to-FTE Ratio	Total Student Classroom Hours	Total Student FTE	Total LCP Earned
Palm Beach	3.13	2,997,699	3,331	10,422
Orange	1.90	1,460,689	1,623	3,077
<b>Miami-Dade</b>	<b>1.35</b>	<b>7,319,793</b>	<b>8,133</b>	<b>10,987</b>
Collier	1.30	793,118	881	1,146
Hillsborough	1.29	953,912	1,060	1,363
Broward	.91	6,156,508	6,841	6,192
Sarasota	.86	794,633	883	758

Source: LCP and Classroom Hours obtained from the Florida Department of Education

Trending M-DCPS Adult ESOL program for the past two fiscal years shows improvement in the LCP-to-FTE ratio in FY2006-07, as shown in the following table.

Comparison of M-DCPS LCP-to-FTE Ratio for the Past Two Fiscal Years				
Fiscal Year	LCP-to-FTE Ratio	Total Student Classroom Hours	Total Student FTE	Total LCP Earned
FY 2006-07	2.25	5,337,198	5,930	13,358
FY 2005-06 <sup>1</sup>	1.88	5,251,644	5,835	10,987

Source: M-DCPS Data in your hands data warehouse

## RECOMMENDATION

1.1 None.

<sup>1</sup> The DOE changed the methodology for calculating classroom hours in FY2006-07. For comparison purposes, the classroom hours, FTE and corresponding LCP-to-FTE ratio for FY2005-06 are presented in this table using the new methodology.

## 2. ENROLLMENT DATA AND PERFORMANCE MEASURES ARE OVERALL RELIABLE

The enrollment data and performance measures are overall reliable although we found exceptions which were limited to two (2) of 20 adult education centers tested.

### Enrollment Data:

#### **Highlights of Finding:**

Unannounced observations at 31 classrooms in session at the 20 adult education centers during the 2006-07 Fiscal Year revealed that reported enrollment data is accurate and reliable.

There were no exceptions noted in the testing of the accuracy and reliability of the enrollment data reported by M-DCPS. That testing included unannounced observations at 31 classrooms in session at the 20 adult education centers during the 2006-07 Fiscal Year. Special consideration was given to courses taught in the evening and/or at satellite locations, as the risk of fictitious enrollment was greater for these courses. For each classroom observation, we performed the following procedures:

- Sampled enrolled students from the Vocational Adult Community System (VACS) and traced them to their attendance records and to other documentation supporting their valid enrollment.
- Compared student's actual attendance to enrollment to ensure students were not fictitiously enrolled.
- Verified that the assigned instructor was indeed teaching the course.

## Performance Measures:

### **Highlights of Finding:**

Students' test scores reported for LCP purposes at 15 out of 17 adult education centers sampled agreed to the students' answer sheets, while reported test scores at two centers did not agree to the answer sheets.

The State funding of the District's Adult ESOL Program is determined primarily by the enrollment in the program and secondarily by the standardized performance measure known as Literacy Completion Points (LCPs).<sup>2</sup> To determine the propriety of LCP's awarded to M-DCPS during the 2005-06 Fiscal Year, we sampled 55 students from 17 of the District's adult education centers (AEC).<sup>3</sup> For each student, we reviewed the student's pre-test and post-test documentation supporting the LCP's. Our review disclosed no exceptions for 15 of the 17 AECs tested. However, at two (2) AECs, namely Hialeah High Adult and Miami Sunset Adult, deficiencies were noted. At Hialeah High Adult, the school's administration was unable to locate the testing files for two students. Also, the school's administration provided to us a post-test answer sheet containing a score that was different than the score reported in VACS for one student. At Miami Sunset Adult, the pre-test answer sheet for two students was left blank by the students and therefore reflected a raw score of zero. However, the pre-test scores entered in VACS for the same two students did not match the raw scores of Zero.

District procedures require school sites to maintain proper test documentation supporting LCP's awarded. Absence of such documentation may result in an increased risk that the LCP performance measure at those AEC's will not be accurate. Additionally, the audit trail needed to validate LCP's awarded will be lacking.

## RECOMMENDATION

- 2.1 Ensure applicable school site staff are aware of test documentation procedures. Keep and maintain sufficient documentation to substantiate the earning of a LCP.**

**Responsible Departments: School Operations (Department of Adult and Community Education); Hialeah High Adult; and Miami Sunset Adult**

<sup>2</sup> The State's formula for funding Adult ESOL and other Adult Education programs is in the process of being modified. In the past, the funding has been based primarily on enrollment and secondarily on performance such as LCP. Based on interviews with senior Florida Department of Education (DOE) officials, these funding drivers will likely remain the components of the State's funding formula.

<sup>3</sup> There is a significant lag time from when an LCP is earned to when it is reported to and tabulated by the DOE. Consequently, we tested LCP data for FY2005-06 rather than FY2006-07 which was not yet available from the DOE.



## **Management Response:**

**Hialeah Adult Education Center** – In order to prevent the recurrence of similar conditions in the future with respect to testing procedures, the principal implemented the following corrective actions and strategies to ensure accurate reporting of test scores and test maintenance.

The principal has reviewed with the assistant principal, testing chairperson and the testing clerk, the procedures for accurate reporting of test scores to ensure that the performance measure is accurate and supports the L.C.P. awarded.

The test chairperson will carefully check the data coding of test scores to reduce errors and to ensure that the score matches the actual student test answer sheet. The Assistant Principal responsible for test oversight will monitor the testing clerk and test chairperson for accuracy in reporting test scores.

The Principal will randomly monitor the in-coding of test scores, on a periodic basis. The test chair person will carefully check the maintenance of test records by personally inspecting student test files for original test records and documentation. The Assistant Principal responsible for testing will monitor test record maintenance on a periodic basis. The Principal will review the test files. Discrepancies found will be addressed and necessary corrections made to maintain accuracy in the reporting of test scores.

**Miami Sunset Adult Education Center** – In order to prevent the recurrence of similar conditions in future audits with respect to Performance Measures, the principal will implement the following corrective actions and preventive strategies in order to ensure accurate monitoring and data input of test score records and streamline the efficiency of data recording.

The principal has reviewed the Testing Procedures Manual with personnel responsible for testing, focusing on a specific process to follow to document and input test scores in the VACS system. A verification system was established by the principal and reviewed with the test data input clerks which facilitated careful review of the testing process and corresponding documentation, as well as the input of test scores in the VACS system. This system will ensure that the test answer sheets agree with the electronic VACS system.

The principal developed with the test chairperson a spread sheet to monitor that the test results entered correlate with the information in the VACS system for data accuracy. In order to ensure consistent reporting and accurate documentation in the file, the test chairperson and the assistant principal will review the data entry every week comparing the hard copies of test scores with the information input to the VACS system. The principal will randomly review test score records and data entry documents on a bi-weekly basis to ensure accuracy in the implementation of procedures.

**3. THE ADULT ESOL PROGRAM IS GENERALLY COMPLIANT WITH APPLICABLE LAWS, RULES, POLICIES AND PROCEDURES, BUT CONTROLS OVER THE DATA INPUT FORM NEED IMPROVEMENT**

**Highlights of Finding:**

The Adult ESOL program was mostly compliant with applicable laws, rules, policies and procedures. However, source documentation of student's initial registration and eligibility was missing in 23% of the cases tested.

During FY2006-07, the District's Adult ESOL program was compliant with applicable laws, rules, policies and procedures in the following areas without significant exception:

- Payroll processing, including instructors' time and attendance,
- Teachers' certification,
- Students' attendance and withdrawal practices.

For each of the above functions, we tested a sample of instructors or students from each of the 20 adult education centers that offer Adult ESOL.

In our test of the Data Input Forms used for initial student registration, staff was unable to locate 7 or 23% of 30 sampled students. Procedures established by School Operations – Department of Adult & Community Education (DACE) require the Data Input Form (FM-3999E) to be completed for each adult education student when he/she initially registers for a course. The completed forms are supposed to be sent to DACE at the end of each trimester and then scanned into a database.

Adult education students are registered on-line through the District's Vocational Adult Community System (VACS), which captures various personal data, including the student's residency status. The student must be a Florida resident in order to be eligible for free Adult ESOL courses.<sup>4</sup> Completion of the Data Input Form provides an additional, but needed level of assurance above entry into VACS, of the enrolled student's proper registration and that the student is a resident of Florida. Both the student and a school administrator sign the Data Input Form, attesting to the accuracy of information provided and reviewed. The form also indicates which of four acceptable

<sup>4</sup> For ESOL purposes, the definition of a resident is not the same as the Federal Government's definition of a legal resident. The definition of a resident is not clearly defined in Florida Statutes or State Board of Education rules for students attending school district adult education courses. The Florida Department of Education encourages school districts to develop residency policy at the local level. M-DCPS requires students to prove their residency by presenting a Florida ID/Driver's License, utility bill, original bank statement, original credit card statement, certificate of domicile or an agency verification.

documents was presented to school staff evidencing Florida residency. The absence of a properly completed Data Input Form increases the risk that the District might be unable to document that all students receiving free Adult ESOL are duly eligible.

## **RECOMMENDATION**

### **3.1 Develop a system that will ensure Data Input Forms are properly completed and stored.**

**Responsible Department:**            **School Operations (Department of Adult and Community Education)**

**Management Response:** The current process, which was designed to help schools by eliminating the need for local storage and cutting costs through centralization, does not have adequate controls to ensure that forms filled out by students are reliably imaged.

A new process will be in place for the 2008-2009 school year that will involve a shift to a decentralized model that will require each school to create images of their own forms and retain the data in digital format.

Adult Vocational/School Operations, school administrators, counselors and registration staff will collaboratively produce an implementation plan, and provide training to school site personnel on the new procedures. Schools will be responsible for purchase, operation and maintenance of the document management system and the search and retrieval of data input form images when required. Adult Vocational/School Operations will formulate a procedural memo to affect these changes for the 2008-09 school year.

## Appendix A – Management's Responses

### MEMORANDUM

MANAGEMENT AND COMPLIANCE AUDIT  
2008 JAN 23 PM 5:0

January 15, 2008  
JEB # 097  
305-822-1500

**TO:** Mr. Allen M. Vann, Chief Auditor  
Office of Management and Compliance Audits

**FROM:** James E. Bishop, Principal *JEB*  
Hialeah Adult Education Center

**THROUGH:** Dr. Marcos M. Moran, Regional Superintendent  
Regional Center I

**SUBJECT:** ADMINISTRATIVE RESPONSE TO THE AUDIT OF ADULT ESOL PROGRAM

The following is a response to relevant findings of the ESOL program audit report regarding deficiencies in performance measures of reliability for Hialeah Adult Education Center.

### RECOMMENDATION

- 2.1 Ensure applicable school site staff are aware of test documentation procedures. Keep and maintain sufficient documentation to substantiate the earning of a LCP.**

#### Management Response

##### Performance Measures

**Discuss with the testing staff proper testing procedures for reporting scores and the maintenance of test records.**

**Persons Responsible: Principal, Assistant Principal, Test Chairperson, Testing Clerks.**

In order to prevent the recurrence of similar conditions in the future with respect to testing procedures, the principal implemented the following corrective actions and strategies to ensure accurate reporting of test scores and test maintenance.

The principal has reviewed with the assistant principal, testing chairperson and the testing clerk, the procedures for accurate reporting of test scores to ensure that the performance measure is accurate and supports the L.C.P. awarded.

The test chairperson will carefully check the data coding of test scores to reduce errors and to ensure that the score matches the actual student test answer sheet. The

## Appendix A – Management’s Responses

Page 2 of 2

January 15, 2008

### ADMINISTRATIVE RESPONSE TO THE ADULT E.S.O.L. PROGRAM AUDIT REPORT

Assistant Principal responsible for test oversight will monitor the testing clerk and test chairperson for accuracy in reporting test scores.

The Principal will randomly monitor the in-coding of test scores, on a periodic basis. The test chair person will carefully check the maintenance of test records by personally inspecting student test files for original test records and documentation. The Assistant Principal responsible for testing will monitor test record maintenance on a periodic basis. The Principal will review the test files. Discrepancies found will be addressed and necessary corrections made to maintain accuracy in the reporting of test scores.

Thank you for your attention to this matter. Should you require any additional information, please contact me at 305-362-0194 or via e-mail at [bishop@dadeschools.net](mailto:bishop@dadeschools.net).

cc: Mr. Freddie Woodson  
Ms. Cynthia Gracia  
Regional Director  
Adult/Vocational Director

JEB/fs  
M#097



## Appendix A – Management's Responses

### MEMORANDUM

MANAGEMENT AND  
COMPLIANCE AUDIT

January 11, 2008

2008 JAN 23 AM 9:4

**TO:** Mr. Allen M. Vann, Chief Auditor  
Office of Management and Compliance Audits

**FROM:** Dr. Dulce Maria de Villa, Principal  
Miami Sunset Adult Education Center *B m v*

**THROUGH:** Ms. Neyda G. Navarro, Region Superintendent  
Regional Center VI *[Signature]*

**SUBJECT:** ADMINISTRATIVE RESPONSE TO INTERNAL AUDIT  
REPORT OF MIAMI SUNSET ADULT EDUCATION  
CENTER

The following is a response to relevant findings in the school audit report of Miami Sunset Adult Education Center.

### RECOMMENDATIONS

**2.1 Ensure applicable school site staff is aware of test documentation procedures. Keep and maintain sufficient documentation to substantiate the earning of a LCP.**

**Person(s) Responsible:** Principal, Assistant Principal, Test Chairperson, Test Data Input Clerks

**Management Response:** In order to prevent the recurrence of similar conditions in future audits with respect to Performance Measures, the principal will implement the following corrective actions and preventive strategies in order to ensure accurate monitoring and data input of test score records and streamline the efficiency of data recording.

The principal has reviewed the Testing Procedures Manual with personnel responsible for testing, focusing on a specific process to follow to document and input test scores in the VACS system. A verification system was established by the principal and reviewed with the test data input clerks which facilitated careful review of the testing process and corresponding documentation, as well as the input of test scores in the VACS system. This system will ensure that the test answer sheets agree with the electronic VACS system.

The principal developed with the test chairperson a spread sheet to monitor that the test results entered correlate with the information in the VACS system for data accuracy. In order to ensure consistent reporting and accurate

## Appendix A – Management’s Responses

documentation in the file, the test chairperson and the assistant principal will review the data entry every week comparing the hard copies of test scores with the information input to the VACS system. The principal will randomly review test score records and data entry documents on a bi-weekly basis to ensure accuracy in the implementation of procedures.

Thank you for your attention to this matter. Should you require additional information, please feel free to contact me at 305-246-5934.

cc: Mr. Freddie Woodson  
Dr. Janice Cruse-Sanchez  
Ms. Cynthia Gracia  
Mr. Bobby Gornto  
Mr. Nelson Perez

DV:JCS/nr

## Appendix A – Management’s Responses

### MEMORANDUM

January 14, 2008

TO: Mr. Allen M. Vann, Chief Auditor  
Office of Management and Compliance Audits

FROM: Freddie Woodson, Associate Superintendent  
School Operations

BY: Nelson Perez, Administrative Director  
Adult and Community Education, School Operations

SUBJECT: ADMINISTRATIVE RESPONSE TO INTERNAL AUDIT  
REPORT OF THE ADULT ESOL PROGRAM

The following is a district response to relevant findings in the audit report of the Adult ESOL Program.

### RECOMMENDATIONS

#### Applicable Laws, Rules, Policies and Procedures

#### 3.1 Develop a system that will ensure Data Input Forms are properly completed and stored.

Person(s) Responsible: Administrative Director, Director of Data Systems

Management Response: The current process, which was designed to help schools by eliminating the need for local storage and cutting costs through centralization, does not have adequate controls to ensure that forms filled out by students are reliably imaged.

A new process will be in place for the 2008-2009 school year that will involve a shift to a decentralized model that will require each school to create images of their own forms and retain the data in digital format.

Adult Vocational/School Operations, school administrators, counselors and registration staff will collaboratively produce an implementation plan, and provide training to school site personnel on the new procedures. Schools will be responsible for purchase, operation and maintenance of the document management system and the search and retrieval of data input form images when required. Adult Vocational/School Operations will formulate a procedural memo to affect these changes for the 2008-09 school year.

Thank you for your attention to this matter. If additional information is needed, feel free to contact me at 305 995-7862.

NJP:dlv  
M016

cc: Dr. Kathleen Caballero  
District Administrative Directors



FW

The School Board of Miami-Dade County, Florida, adheres to a policy of nondiscrimination in employment and educational programs/activities and programs/activities receiving Federal financial assistance from the Department of Education, and strives affirmatively to provide equal opportunity for all as required by:

**Title VI of the Civil Rights Act of 1964** - prohibits discrimination on the basis of race, color, religion, or national origin.

**Title VII of the Civil Rights Act of 1964**, as amended - prohibits discrimination in employment on the basis of race, color, religion, gender, or national origin.

**Title IX of the Education Amendments of 1972** - prohibits discrimination on the basis of gender.

**Age Discrimination in Employment Act of 1967 (ADEA)**, as amended - prohibits discrimination on the basis of age with respect to individuals who are at least 40.

**The Equal Pay Act of 1963**, as amended - prohibits sex discrimination in payment of wages to women and men performing substantially equal work in the same establishment.

**Section 504 of the Rehabilitation Act of 1973** - prohibits discrimination against the disabled.

**Americans with Disabilities Act of 1990 (ADA)** - prohibits discrimination against individuals with disabilities in employment, public service, public accommodations and telecommunications.

**The Family and Medical Leave Act of 1993 (FMLA)** - requires covered employers to provide up to 12 weeks of unpaid, job-protected leave to "eligible" employees for certain family and medical reasons.

**The Pregnancy Discrimination Act of 1978** - prohibits discrimination in employment on the basis of pregnancy, childbirth, or related medical conditions.

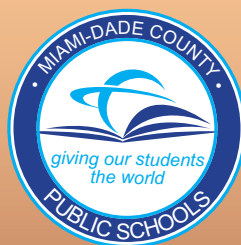
**Florida Educational Equity Act (FEEA)** - prohibits discrimination on the basis of race, gender, national origin, marital status, or handicap against a student or employee.

**Florida Civil Rights Act of 1992** - secures for all individuals within the state freedom from discrimination because of race, color, religion, sex, national origin, age, handicap, or marital status.

**School Board Rules 6Gx13- 4A-1.01, 6Gx13- 4A-1.32, and 6Gx13- 5D-1.10** - prohibit harassment and/or discrimination against a student or employee on the basis of gender, race, color, religion, ethnic or national origin, political beliefs, marital status, age, sexual orientation, social and family background, linguistic preference, pregnancy, or disability.

*Veterans are provided re-employment rights in accordance with P.L. 93-508 (Federal Law) and Section 295.07 (Florida Statutes), which stipulate categorical preferences for employment.*

***INTERNAL AUDIT REPORT  
Adult ESOL Program  
JANUARY 2008***



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