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TO: Adult Education Consortia Partners

FROM: Scott B. Sanders, Commissioner

DATE: September 12, 2014

SUBJECT: DWD Policy 2014-04
Adult Education Program Monitoring and Improvement Policy

Purpose
This policy describes the process for monitoring and evaluating Adult Education (AE) programs.

Rescission
DWD Policy 2013-06: Adult Education Program Monitoring and Improvement Policy

Content
The Department of Workforce Development (DWD), Division of Adult, Career, and Technical Education will monitor Adult Education (AE) programs based on the regional grant application submitted to and approved by DWD. If DWD determines a program is not meeting conditions in the grant, DWD will identify the program for improvement.

Risk Analysis and Identification for Further Review
DWD will perform an annual risk assessment for each program to determine which programs require a more in-depth review. As required by federal law, DWD staff will also perform an on-site review of any programs that are high risk according to the assessment results. Programs will be notified of the need for a more in-depth review as noted in this policy. Programs may access the risk assessment, desk review, and onsite review forms on the DWD adult education administration-website found at: http://www.in.gov/dwd/adultedadmin/.

DWD will notify the fiscal agent and the program director overseeing the program if their program has been identified for further review. The notification will include further instructions on next steps and any additional information requested. These documents may include, but are not limited to, inventory of equipment purchased with grant funds, local attendance policy, and information on distance learning.

After DWD reviews the program information, DWD will inform the program if an On Site visit is necessary. If it is not, DWD will provide feedback that includes required changes and recommendations. DWD will follow up with the program to ensure any issues have been addressed appropriately.

On Site Visits

Notification of an On Site review will include a request for any staff that should be made available for interviews during the visit, such as program director, teachers, fiscal staff, counselors, and students. All program records must be made fully available to DWD staff during the On Site Visit.

After the On Site Visit, DWD will submit any observations and findings to the program. Observations will include areas of improvement for the program. Programs will be required to respond to all observations in writing with actions they are taking. Findings are issues deemed serious enough to initiate a Corrective Action Plan (CAP). DWD will work with the program to develop the CAP and the timeline for response. DWD will follow-up with all programs that are on a CAP to ensure required changes are being made.

Failure to implement elements of the CAP or achieve negotiated performance targets may result in DWD taking further action. These actions may include fiscal agent change and/or removal of AE program eligibility for federal and state funding. (EDGAR 34 CFR 80.43)

Student Record Retention

DWD requires AE programs to maintain student records in InTERS and in a student folder for data validation purposes, in accordance with AE Data Collection and Reporting Policy.

At a minimum student folders shall be kept for three (3) full program years. If a program's student record is monitored, audited, or removed before the three (3) year period has passed, records must be maintained until the monitoring is completed or the three (3) year period has passed, whichever is later. To ensure the protection of student information, the folder's contents shall be disposed of eliminating the contents after no less than the necessary retention period (e.g., paper shredding).

In the event of a site or program closure, the student folders must be transferred to the program taking over the students. The incoming program will assume responsibility of those student records.

Student Folder

Folders shall be kept in a secure area such as cabinets. Folder tabs shall be labeled legibly with the student's last and first name.

The student folder shall contain the following information:

- Release of information;
- Registration form(s);
- Paper-based assessment information;
- Exit with principal's signature for any student at the ages of 16 and 17; and,

- Original versions of any additional signed documents.

Special Circumstance for Youth
The exit form with principal's signature is required for any student at the ages of 16 and 17. AE programs may reuse this form if the student reenters the program.

Effective Date
Immediately

Ending Date
Upon Rescission

Ownership
Division of Adult, Career, and Technical Education
Indiana Department of Workforce Development
10 North Senate Avenue
Indianapolis, IN 46204
AdultEd@dwd.IN.gov

Action
Indiana's Adult Education system will follow the guidance contained in this policy.