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**State Auditor**

An Audit Report on

# **Dual Credit Programs at Selected Public School Districts and Higher Education Institutions**

September 2010

Report No. 11-006



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## *Overall Conclusion*

All selected community colleges' and corresponding independent school districts' (ISDs) dual credit programs fully or substantially complied with most state requirements, as well as with the applicable community colleges' and ISDs' policies and procedures.

Ten of the 12 community colleges reviewed fully or substantially complied with all requirements related to ensuring that students met minimum test scores and completed prerequisite courses to enroll in dual credit courses. Eight of the 12 community colleges reviewed fully or substantially complied with all requirements related to ensuring that all dual credit teachers met the requirements to teach dual credit courses and were approved prior to the courses' start dates.

However, 10 of the 12 community colleges reviewed should improve their monitoring and evaluation of dual credit courses and/or teachers. In addition, 8 of the 12 community colleges should improve their contract agreements for dual credit programs with at least one ISD tested to ensure that the contract agreements include all of the elements required by the Texas Administrative Code and are signed by representatives of both the community college and ISD prior to the offering of dual credit courses.

To determine the dual credit programs' compliance with state rules and regulations and community college and ISD policies and procedures, auditors tested compliance in five general areas. Those areas were:

- Student eligibility.
- Teacher requirements.
- Monitoring and evaluation.
- Contract agreements.

### **Dual Credit and Dual Enrollment**

Texas Administrative Code, Title 19, Section 4.83 (4), defines **dual credit** as a process in which a high school student enrolls in a college course and receives simultaneous academic credit for the course from both the college and the high school. Dual credit is also referred to as concurrent course credit.

**Dual enrollment** refers to a circumstance in which a student is enrolled in more than one education institution (including a high school and a college).

In Fall 2009, 403,889 (92 percent) of 440,795 semester credit hours awarded to dual credit students in the state of Texas were awarded by community colleges (see Appendices 3 and 4 for more information).

*This audit was conducted in accordance with Texas Government Code, Section 321.0132.*

*For more information regarding this report, please contact Verma Elliott, Audit Manager, or John Keel, State Auditor, at (512) 936-9500.*

- Policies and procedures.

Auditors also identified other less significant issues that were communicated separately in writing to each community college reviewed.

### ***Summary of Management's Response***

All the colleges and independent school districts that submitted management responses generally agree with the findings and recommendations in this report.

### ***Summary of Information Technology Review***

Auditors reviewed each community college's information technology controls over the student information systems used to manage the dual credit programs to determine the validity and reliability of the data in those systems for the purposes of this audit. Auditors conducted a high-level review of general controls, including a review of password management controls, user access controls, and change management controls. Auditors also reviewed application controls. Texarkana College did not use an information system for its dual credit program.

Eight of the 11 community colleges reviewed had insufficient general controls. As a result, the data in those eight colleges' student information systems was unreliable for the purposes of this audit. Instead, auditors tested hard-copy documentation to determine whether those eight community colleges were complying with dual credit program requirements.

### ***Summary of Objective, Scope, and Methodology***

The audit objective was to determine whether selected ISDs and higher education institutions have designed and implemented dual credit programs that meet the institutions' and ISDs' policies and procedures and state laws and rules regarding such matters as student eligibility, courses offered, and funding agreements.

The audit scope included the Fall 2008, Spring 2009, and Fall 2009 semesters. The 12 community colleges selected for testing were:

- Alamo Community College District - St. Philip's College.
- Central Texas College.
- Clarendon College.
- Dallas County Community College District - Cedar Valley College.
- Dallas County Community College District - Richland College.
- El Paso Community College.

- Hill College.
- Kilgore College.
- Odessa College.
- Panola College.
- South Texas College.
- Texarkana College.

For each of the community colleges tested, auditors also reviewed the dual credit programs at two ISDs with which the community college had a contract agreement for dual credit courses. In addition, auditors tested one high school in each of the ISDs selected for testing. Auditors selected the community colleges, ISDs, and high schools by analyzing data provided by the Higher Education Coordinating Board and the Texas Education Agency.

The audit methodology included interviewing key personnel at each community college, ISD, and high school selected; reviewing policies and procedures for dual credit programs at each community college and ISD selected; testing documentation related to student eligibility and teacher qualifications; assessing course documentation and evaluations; and analyzing the student information systems used to enroll students in dual credit courses at the community colleges tested to determine data reliability.

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# Detailed Results

## Chapter 1

### ***While All 12 Community Colleges Tested Fully or Substantially Complied with Most Requirements in Administering Dual Credit Programs, Each Community College Needs Improvement in at Least One Area Tested***

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#### Compliance Levels

To determine whether community colleges and ISDs complied with state requirements, as well as the community colleges' and ISDs' policies and procedures, auditors developed the following methodology:

- **Fully Compliant** - At least 95 percent of the items tested complied with the requirement, or the community college and/or ISD performed the requirements tested.
- **Substantially Compliant** - Between 70 percent and 94 percent of the items tested complied with the requirement.
- **Needs Improvement** - Less than 70 percent of the items tested complied with the requirement, or the community college and/or ISD did not perform the requirements tested.
- **Not Applicable** - Not applicable for the testing attribute

The 12 community colleges' and corresponding independent school districts' (ISDs) dual credit programs selected for testing fully or substantially complied with most state requirements, as well as with the applicable community colleges' and ISDs' policies and procedures (see text box for definitions of compliance levels). Specifically, most community colleges fully or substantially complied in ensuring students met eligibility requirements to enroll in dual credit courses and ensuring that teachers met requirements to teach dual credit courses. However, auditors identified areas for improvement at each community college tested. Specifically, most community colleges should improve their monitoring and evaluation of dual credit teachers and courses and their contract agreements with ISDs. Most community colleges should also improve their documentation of compliance with dual credit program requirements.

To determine the dual credit programs' compliance with state rules and regulations and the community colleges' and ISD's policies and procedures, auditors tested compliance in five general areas. Those areas were:

- Student eligibility.
- Teacher requirements.
- Monitoring and evaluation.
- Contract agreements.
- Policies and procedures.

#### Student Eligibility

Most of the community colleges tested either fully or substantially complied with requirements related to student eligibility. Specifically, all of the community colleges ensured that students met minimum test scores. In addition, 10 of the 12 community colleges ensured that students completed college prerequisite courses prior to enrolling in a dual credit course.

However, Clarendon College and Panola College need to improve their processes to ensure that students complete all prerequisite courses.

In addition, 10 of the 12 community colleges tested fully or substantially complied with the requirement that students be approved by their high schools prior to enrolling in dual credit courses. However, South Texas College and Texarkana College should improve their processes to ensure that the high schools approve students to enroll in dual credit courses before courses begin, and that this approval is adequately documented. (See Chapters 2 through 13 for detailed results for each community college tested.)

Table 1 shows each community college's compliance with the requirements tested related to student eligibility.

Table 1

Community Colleges' Compliance with Requirements Tested Related to Student Eligibility												
Requirement	Alamo Community College District - St. Philip's College (Comal and Seguin ISDs)	Central Texas College (Florence and Killeen ISDs)	Clarendon College (Childress and Pampa ISDs)	Dallas County Community College District - Cedar Valley College (Cedar Hill and DeSoto ISDs)	Dallas County Community College District - Richland College (Richardson ISD and Richland Collegiate High School)	El Paso Community College (Clint and Socorro ISDs)	Hill College (Cleburne and Grandview ISDs)	Kilgore College (Longview and Sabine ISDs)	Odessa College (Ector County and Seminole ISDs)	Panola College (Center and Joaquin ISDs)	South Texas College (La Joya and McAllen ISDs)	Texarkana College (New Boston and Texarkana ISDs)
Student(s) meet minimum test scores.	●	●	●	●	●	●	●	●	●	●	●	●
Student(s) enrolled in dual credit courses meet the dual credit courses' prerequisites.	●	●	○	●	●	●	●	●	●	○	●	●
Student(s) enrolled in dual credit courses are properly documented and approved by the high school.	●	●	○	●	●	●	●	●	●	●	○	○
Student(s) enrolled in dual credit courses are in the 11th or 12th grades, or they show outstanding academic performance to take dual credit and are appropriately approved to enroll.	N/A	N/A	N/A	●	N/A	N/A	●	●	N/A	N/A	○	N/A
Student(s) are enrolled in two or fewer dual credit courses in one semester, or they show the outstanding academic performance required to take more than two dual credit courses and are appropriately approved and this approval is documented.	●	●	●	N/A	○	●	●	●	●	●	○	●

**Community Colleges' Compliance with Requirements Tested Related to Student Eligibility**

Requirement	Alamo Community College District - St. Philip's College (Comal and Seguin ISDs)	Central Texas College (Florence and Killteen ISDs)	Clarendon College (Childress and Pampa ISDs)	Dallas County Community College District - Cedar Valley College (Cedar Hill and DeSoto ISDs)	Dallas County Community College District - Richland College (Richardson ISD and Richland Collegiate High School)	El Paso Community College (Clint and Socorro ISDs)	Hill College (Cleburne and Grandview ISDs)	Kilgore College (Longview and Sabine ISDs)	Odessa College (Ector County and Seminole ISDs)	Panola College (Center and Joaquin ISDs)	South Texas College (La Joya and McAllen ISDs)	Texarkana College (New Boston and Texarkana ISDs)
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**Note:**

- - The community college fully complied with the requirement.
- ◐ - The community college substantially complied with the requirement.
- - The community college needs improvement in this area.
- N/A - The requirement is not applicable to the community college.

**Teacher Requirements**

All of the community colleges tested either fully or substantially complied with requirements related to ensuring that teachers met the minimum requirements to teach dual credit courses. Specifically, 11 of the 12 community colleges fully complied with the requirement that all dual credit teachers had either a master's or doctorate degree in the subject area they were teaching, or had at least a master's degree and 18 graduate hours in the subject area they were teaching. One community college substantially complied with this requirement.

In addition, 7 of the 12 community colleges fully complied with the requirement that dual credit teachers be approved prior to the start of dual credit courses. One community college substantially complied with this requirement. However, Cedar Valley College, Hill College, Odessa College, and South Texas College should improve their processes to ensure that they consistently comply with this requirement. (See Chapters 2 through 13 for detailed results for each community college tested.)

Table 2 on the next page shows each community college's compliance with the requirements tested related to teachers.

Table 2

Community Colleges' Compliance with Requirements Tested Related to Teachers

Requirement	Alamo Community College District- St. Philip's College (Comal and Seguin ISDs)	Central Texas College (Florence and Killeen ISDs)	Clarendon College (Childress and Pampa ISDs)	Dallas County Community College District - Cedar Valley College (Cedar Hill and DeSoto ISDs)	Dallas County Community College District - Richland College (Richardson ISD and Richland Collegiate High School)	El Paso Community College (Clint and Socorro ISDs)	Hill College (Cleburne and Grandview ISDs)	Kilgore College (Longview and Sabine ISDs)	Odessa College (Ector County and Seminole ISDs)	Panola College (Center and Joaquin ISDs)	South Texas College (La Joya and McAllen ISDs)	Texarkana College (New Boston and Texarkana ISDs)
Teacher has a master's or doctorate degree in subject area or at least a master's degree and a minimum of 18 graduate hours in subject area.	●	●	●	●	●	●	●	●	●	●	●	○
Teacher is approved before the dual credit course starts.	●	○	●	○	●	●	○	●	○	●	○	●
Teacher completes the same approval procedures for selecting faculty responsible for teaching courses at the main campus of the community college.	●	●	●	○	●	●	●	●	●	●	●	●
<p>Note:</p> <ul style="list-style-type: none"> <li>● - The community college fully complied with the requirement.</li> <li>○ - The community college substantially complied with the requirement.</li> <li>○ - The community college needs improvement in this area.</li> <li>N/A - The requirement is not applicable to the community college.</li> </ul>												

**Monitoring and Evaluation**

Ten of 12 community colleges need improvement in at least one requirement related to monitoring and evaluation. Specifically, 8 of the 12 community colleges should improve their reviews of dual credit teachers, and 10 of 12 community colleges should improve their reviews of dual credit courses.

All community colleges tested ensured that dual credit courses were included in the *Lower Division Academic Course Guide Manual*, which is the official list of approved courses for general academic transfer that may be offered for state funding by public community and technical colleges in Texas.<sup>1</sup> (See Chapters 2 through 13 for detailed results for each community college tested.)

Table 3 on the next page shows each community college's compliance with the requirements tested related to monitoring and evaluation.

<sup>1</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

Table 3

Community Colleges' Compliance with Requirements Tested Related to Monitoring and Evaluation												
Requirement	Alamo Community College District- St. Philip's College (Comal and Seguin ISDs)	Central Texas College (Florence and Killeen ISDs)	Clarendon College (Childress and Pampa ISDs)	Dallas County Community College District - Cedar Valley College (Cedar Hill and DeSoto ISDs)	Dallas County Community College District - Richland College (Richardson ISD and Richland Collegiate High School)	El Paso Community College (Clint and Socorro ISDs)	Hill College (Cleburne and Grandview ISDs)	Kilgore College (Longview and Sabine ISDs)	Odessa College (Ector County and Seminole ISDs)	Panola College (Center and Joaquin ISDs)	South Texas College (La Joya and McAllen ISDs)	Texarkana College (New Boston and Texarkana ISDs)
The community college is responsible for monitoring and evaluations.	○	○	○	●	●	●	●	●	○	●	●	○
The community college reviewed dual credit teachers.	○	○	○	○	●	○	○	●	○	●	●	○
The community college reviewed dual credit courses.	○	○	○	○	●	○	○	○	○	○	●	○
The community college ensured that community college syllabi were used.	●	○	●	○	●	●	●	●	○	●	●	●
The community college ensured that dual credit course(s) were identified as college level academic course(s) in the current edition of the <i>Lower Division Academic Course Guide Manual</i> .	●	●	●	●	●	●	●	●	●	●	●	●
The community college was accredited by a regional accrediting association.	●	●	●	●	●	●	●	●	●	●	●	●
Note:												
● - The community college fully complied with the requirement.												
● - The community college substantially complied with the requirement.												
○ - The community college needs improvement in this area.												
N/A - The requirement is not applicable to the community college.												

### Contract Agreements

Most community colleges tested should improve their dual credit contract agreements to ensure that they include all of the elements required by the Texas Administrative Code. Specifically, contract agreements at 8 of the 12 community colleges reviewed lacked at least 4 elements required by the Texas Administrative Code.

In addition, 8 of the 12 community colleges reviewed did not consistently ensure that the contract agreements tested were signed by representatives of both the community college and the ISD prior to the offering dual credit courses. Two of the 12 community colleges reviewed did not consistently ensure that the community colleges and the ISDs were using the same contract agreement. (See Chapters 2 through 13 for detailed results for each community college tested.)

### Policies and Procedures

All but one of the ISDs reviewed ensured that their policies and procedures related to dual credit programs included all of the elements required by the Texas Administrative Code and the Texas Education Code. One ISD did not have documented policies and procedures related to its dual credit program. (See Chapters 2 through 13 for detailed results for each ISD tested.)

**Districts and High Schools Tested**

As part of the audit of St. Philip's College's (College) dual credit program, auditors tested the dual credit programs at Canyon High School in the Comal Independent School District and Seguin High School in the Seguin Independent School District.

St. Philips College's (College) dual credit program fully complied with all requirements related to student eligibility, teacher qualifications, and policies and procedures. However, the College should improve its monitoring and evaluation of dual credit courses and teachers and its contract agreements with the Comal and Seguin independent school districts (ISDs) for dual credit programs (see text box for information about the ISDs and high schools included in auditors' review).

The College fully complied with all requirements related to student eligibility.

The College fully complied with requirements to ensure that students were eligible to enroll in dual credit courses. Specifically, all 84 students reviewed met the eligibility requirements and prerequisites for the dual credit courses in which they were registered.

The College also ensured that most students were approved to take dual credit courses. However, one student's file did not contain documentation of the required approvals to take dual credit courses in the Fall 2008 semester. Title 19, Texas Administrative Code, Section 74.25, requires students to have the approval of the high school principal or other official designated by the ISD to be eligible to enroll in dual credit courses. Because there was no documented approval form, auditors were unable to determine whether this student was appropriately approved to enroll in dual credit courses during the Fall 2008 semester.

The College fully complied with all requirements related to teacher qualifications.

The College fully complied with requirements to ensure that teachers were qualified and approved to teach dual credit courses before the start of the courses. Specifically, all 10 dual credit teachers reviewed had the required educational credentials to teach dual credit courses in compliance with the Texas Administrative Code and the guidelines of the Southern Association of Colleges and Schools, which is the College's accrediting entity.

The College ensured that the dual credit courses offered met college level requirements; however, the College should improve its monitoring and evaluation of dual credit courses and teachers.

All of the dual credit courses offered by the College and two ISDs reviewed were included in the *Lower Division Academic Course Guide Manual*, which is the official list of approved courses for general academic transfer that may

be offered for state funding by public community and technical colleges in Texas.<sup>2</sup>

However, the College relied upon the ISDs to supervise, monitor, and evaluate dual credit courses and the high school teachers who taught dual credit courses. Title 19, Texas Administrative Code, Section 4.85, requires the higher education institutions to supervise and evaluate teachers of dual credit courses using the same or comparable procedures used for faculty at the main campus of the higher education institution. If the College does not adequately monitor and evaluate dual credit courses and teachers, it cannot ensure that the academic rigor of the dual credit courses is at the college level in compliance with state requirements.

In addition, the College did not comply with its own policies requiring it to collect students' evaluations of the dual credit teachers and the dual credit courses the students completed. The College had not been requiring its dual credit students to complete these evaluations. As a result, the College is not receiving potentially useful feedback on the quality of the teaching and courses that could be used to improve the students' dual credit course experience.

Contract agreements between the College and the ISDs to provide dual credit courses did not include all of the elements required by the Texas Administrative Code.

The contract agreements between the College and the Comal and Seguin ISDs did not include 4 of the 12 elements tested that are required by Title 19, Texas Administrative Code, Section 4.84 (see Appendix 2 for a complete list of the required elements). Specifically, the required elements missing from the contract agreements reviewed included:

- Faculty evaluation – The contract agreements did not address an evaluation process for the teachers of dual credit courses.
- Course curriculum – The contract agreements did not define the dual program's curriculum.
- Course grading – The contract agreements did not address how the dual credit courses would be graded.
- Student support services – The contract agreements did not address student support services.

Although these four elements are addressed in various College manuals and guides, such as faculty handbooks and the College's *Dual Credit Program Manual*, the contract agreements reviewed do not make reference to those

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<sup>2</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

documents. Without ensuring that its contract agreements contain all the required elements, the College faces an increased risk of misunderstandings with the ISDs regarding the dual credit program.

In addition, the contract agreements for both the Fall 2008-Spring 2009 and Fall 2009-Spring 2010 school years were signed after the dual credit courses had already started. Texas Administrative Code, Title 19, Section 4.84(a), requires that dual credit contract agreements be signed before the courses begin. The contract agreements' terms also require execution of the agreements by the first day of classes. However, dual credit courses were routinely started well before the contract agreements were executed, sometimes more than a year before the contract agreements were executed.

The ISDs fully complied with all requirements related to policies and procedures.

The Comal and Seguin ISDs' policies and procedures regarding dual credit contained all of the elements required by the Texas Administrative Code and Texas Education Code.

The College did not have sufficient user access controls over its student information system.

Auditors identified weaknesses in the user access controls over the student information system the College used to enroll students in dual credit courses. To minimize the risks associated with public disclosure, auditors communicated the details regarding those issues in writing directly to the College.

As a result, the data in that system was not reliable for the purposes of this audit. Auditors tested hard-copy documentation to determine whether the College was complying with dual credit program requirements. Title 1, Texas Administrative Code, Section 202.70, requires higher education institutions to protect vital assets against unauthorized access, as well as to assure the availability, integrity, utility, authenticity, and confidentiality of information. If the College grants inappropriate access to its student information system, there is increased risk that sensitive data may be manipulated, destroyed, or misused.

## Recommendations

Alamo Community College District - St. Philip's College should:

- Ensure that all relevant student approval documents are retained for its dual credit students. The College should also ensure that all students' dual credit request forms for course approval are signed by the College before the start of the dual credit courses.

- Monitor and evaluate dual credit teachers and courses on a regular basis to ensure that the instruction and materials provided are at the college level.
- Ensure that dual credit students complete evaluations of dual credit courses and teachers.
- Ensure that its dual credit program contract agreements with ISDs include all the elements required by the Texas Administrative Code.
- Ensure that its contract agreements are executed and signed by College and ISD representatives prior to the offering of dual credit courses.
- Review all access accounts to the information systems used to enroll students in dual credit courses and ensure that it grants access based on the users' job duties. As part of this, the College should review and disable, if necessary, duplicate accounts and accounts that are no longer required.

**Management's Response from Alamo Community College District - St. Philip's College**

***Ensure that all relevant student approval documents are retained for its dual credit students. The College should also ensure that all students' dual credit request forms for course approval are signed by the College before the start of the dual credit classes.***

*All working student documentation, including consent forms, test scores, and transcripts will be scanned when received into the dual credit office to guarantee that the office always has a copy of all relevant documentation. A high speed scanner has been purchased to ensure that this process can take place. Once a student's eligibility to take a course(s) is determined, the student consent form will be signed by the dual credit personnel and when appropriate, by the Vice-President of Academic Affairs, before or at the same time the student is registered for the course(s). Once students have been registered and confirmation from the Independent School District (ISD) has been received, all working documents will be scanned into the district's Web Extender electronic database for permanent retention of the records.*

***Monitor and evaluate dual credit teachers and courses on a regular basis to ensure that the instruction and materials provided is at the college level.***

*Within each academic department a full-time faculty mentor will be assigned to each dual credit instructor. The mentor will ensure that the dual credit instructor is provided all necessary course material including departmental syllabus and will be the dual credit instructor's point of contact for questions concerning the course. The mentor will be responsible for confirming that the course is being taught with the appropriate rigor and that the approved course materials including textbooks and any laboratory equipment are*

*readily available. In courses where departmental final exams are given, student results on the exam will be used as another measure for confirmation that the course objectives are being taught.*

***Ensure that dual credit students complete evaluations of dual credit courses and teachers.***

*Peer and student evaluations as well as a peer observation of the dual credit teacher will be performed by the departmental mentor and according to the Alamo Colleges policies for adjunct instructors. An annual review of the records will be performed by the appropriate academic dean to ensure that these guidelines are being followed.*

***Ensure that its dual credit program contract agreements with the ISDs include all the elements required by the Texas Administrative Code.***

*The Alamo Colleges Office of Legal Services is working in conjunction with the district dual credit committee and the Associate Vice Chancellor for Academic Partnerships & Initiatives to ensure that all elements of the Texas Administrative Code are included in the revised district-wide MOU.*

***Ensure that its contract agreements are executed and signed by College and ISD representatives prior to the offering of dual credit courses.***

*The revised MOU will be executed with the School Districts rather than the individual high schools and will have a three year term. On initial and renewal years, the revised MOU will be signed with the ISD during the spring or summer preceding courses being taught in the fall.*

***Review all access accounts to the information systems used to enroll students in dual credit courses and ensure that it grants access based on the users' job duties. As part of this, the College should review and disable, if necessary, duplicate accounts and accounts which are no longer required.***

*Beginning with the Fall 2010 registration cycle, the Student Information System (SIS Plus) that has been used for the last 21 years for registration and maintenance of student records by Alamo Colleges and St. Philip's College was replaced with the Sungard Higher Education Banner System. SIS is no longer a live system and is used for reference only.*

*With the implementation of Banner, significant thought was given to the type of access that would be available and to whom that access should be granted. The granting of access to systems now requires a four-step process: 1) the colleges (employee) must initiate a request for access, 2) the supervisor approves or declines the request, 3) the college VP approves or declines the request, 4) the function data owner (finance, HR/Payroll, Student, Financial Aid, Bursar) approves or declines the request. With this new process, many of the issues identified by the audit concerning liberal access to student*

*information and registration activities have been resolved. A group of individuals from SPC were identified and selected to perform the registration activities for dual credit students. Once the registration process is completed user access will be disabled.*

**Districts and High Schools Tested**

As part of the audit of Central Texas College's (College) dual credit program, auditors tested the dual credit programs at Florence High School in the Florence Independent School District and Harker Heights High School in the Killeen Independent School District.

Central Texas College's (College) dual credit program fully or substantially complied with all requirements related to student eligibility, teacher qualification, policies and procedures, and its contract agreements with the Florence and Killeen independent school districts (ISDs) for dual credit programs (see text box for information about the ISDs and high schools included in auditors' review). However, the College should improve its monitoring and evaluation of dual credit courses and teachers.

The College fully complied with all requirements related to student eligibility.

All 87 students reviewed met eligibility requirements and had completed the required prerequisites for the dual credit courses in which they were enrolled.

The College fully or substantially complied with all requirements related to teacher qualifications.

The College fully complied with requirements to ensure that teachers were qualified to teach dual credit courses. Specifically, 28 of 29 dual credit teachers reviewed had the required credentials to teach college level courses. The College had hired one teacher reviewed based on the teacher's stated plan to complete a master's degree in the following year. According to the guidelines of the Southern Association of Colleges and Schools (SACS), which is the College's accrediting entity, teachers must have completed at least a master's degree and 18 teaching hours in the discipline. The College's policies and procedures allow it to approve a teacher without a master's degree if the teacher has acceptable work experience to substitute for the academic requirements. However, this policy does not comply with SACS guidelines or with Title 19, Texas Administrative Code, Section 4.85, which requires higher education institutions to comply with SACS guidelines.

The College substantially complied with requirements to ensure that teachers are approved to teach dual credit courses before the start of the courses. Auditors noted that 3 (10 percent) of 29 dual credit teachers reviewed began teaching courses before they were formally approved to teach the courses.

Although the College ensured that the dual credit courses offered met college level requirements, it should improve its monitoring and evaluation of dual credit courses and teachers.

All of the dual credit courses offered by the College and two ISDs reviewed were included in the *Lower Division Academic Course Guide Manual*, which is the official list of approved courses for general academic transfer that may

be offered for state funding by public community and technical colleges in Texas.<sup>3</sup>

However, the College relied upon the ISDs to supervise, monitor, and evaluate dual credit courses and high school teachers to ensure that the courses were taught at the college level. Title 19, Texas Administrative Code, Section 4.85, requires the higher education institutions to supervise and evaluate teachers of dual credit courses using the same or comparable procedures used for faculty at the main campus of the higher education institution. If the College does not adequately monitor and evaluate dual credit courses and teachers, it cannot ensure that course material is being taught at the college level in compliance with state requirements.

In addition, for courses taught on the high school campuses, the College requires ISDs to use the same syllabus as the course taught on the college campus to ensure that they are equivalent with regard to curriculum, materials, instruction, and rigor. However, the College did not review the dual credit course syllabi to ensure that the designated syllabi were being used. In addition, the two high schools reviewed did not consistently maintain copies of all syllabi for dual credit courses taught on their campuses. Specifically:

- Florence High School could provide auditors with 8 (50 percent) of 16 syllabi requested. All eight syllabi provided matched the College's syllabi for the respective course taught.
- Harker Heights High School could provide auditors with 7 (44 percent) of 16 syllabi requested. All seven syllabi provided matched the College's syllabi for the respective course taught.

The College fully complied with all requirements related to contract agreements.

The College's contract agreements with the Killeen and Florence ISDs for offering dual credit courses contained all 12 elements tested that are required by Title 19, Texas Code, Section 4.84.

The ISDs fully complied with all requirements related to policies and procedures.

The Killeen and Florence ISDs' policies and procedures regarding dual credit included all of the elements required by the Texas Administrative Code and Texas Education Code.

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<sup>3</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

The College did not have sufficient change management controls over its student information system.

The College did not have an adequate process to ensure that all changes made to its student information system were sufficiently evaluated, approved, and documented. This weakness increases the risk that unauthorized or unapproved changes could be made to the production environment and/or the student data.

Because of this control weakness, auditors could not rely on the data in the College's student information system for the purposes of this audit. Instead, auditors tested hard-copy documentation from the College and the ISDs to determine whether the College complied with dual credit program requirements.

## Recommendations

Central Texas College should:

- Approve only teachers who meet the minimal requirements stated in the SACS guidelines and the Texas Administrative Code for the teaching of dual credit courses, and ensure that teachers are approved prior to the beginning of the dual credit courses they teach.
- Modify its policies and procedures to align with SACS guidelines and the Texas Administrative Code for the hiring of dual credit course teachers.
- Monitor and evaluate dual credit teachers on a regular basis to ensure that the instruction provided is at the college level. This could include regular observation and evaluation of high school dual credit courses by senior teachers in the corresponding discipline at the College.
- Monitor dual credit courses, including a review of all syllabi used, to ensure that the curriculum, materials, and rigor of the courses are equivalent to that of a course offered at the main campus of the College.
- Develop policies and procedures to ensure that all changes made to program code are authorized, tested, approved, and implemented by individuals separate from those who created or made the changes.

The Florence Independent School District should ensure that high schools offering dual credit courses retain all course syllabi for dual credit courses.

The Killeen Independent School District should ensure that high schools offering dual credit courses retain all course syllabi for dual credit courses.

## Management's Response from Central Texas College

### ***Student Eligibility:***

*CTC agrees with the State Auditor's Office findings relative to student eligibility.*

*No corrective action is necessary.*

### ***Teacher Requirements:***

*CTC agrees with the State Auditor's Office findings relative to teacher requirements.*

*After reviewing the State Auditor's Office findings the Deputy Chancellor, Educational Program and Support Services will revise Policy 160 Instruction Personnel — Qualification and Approval Procedures to more closely align its policy with the generally accepted qualifications of master's degree and 18 Semester credit hours in the teaching discipline following the Commission on Colleges of the Southern Association of Colleges and Schools guidelines.*

*The person responsible for the implementation of the corrective action is Deputy Chancellor, Educational Program and Support Services.*

*Implementation is scheduled for Spring 2011.*

### ***Monitoring and Evaluation:***

*CTC agrees with the State Auditor's Office findings relative to monitoring and evaluation.*

*CTC initiated actions immediately upon receipt of the State Auditor's Office findings regarding failure to fully comply with the requirements to supervise, monitor, and evaluate dual credit instructors and courses and the enforcement of the use of the college syllabi.*

*The Central Campus Dean implemented a new policy with the Academic Department Chairs that states they must personally or appoint a designee to oversee the dual credit classrooms. This person is the point of contact (POC) for ISD employees to discuss subject matter. The CTC POC will also conduct classroom visits. During classroom visits the syllabus, grading policies, and teaching style will all be reviewed to ensure that instructors follow CTC guidelines. The Director, Recruitment Communication and Outreach will be responsible for tracking the number of visits per classroom and collecting the evaluations that are completed.*

*Five pre-service meetings, one at each campus in the local area, were held to inform the instructors of the new policies and to address issues and concerns.*

*Participants included all dual credit instructors, an administrator from the district, and the Director, Recruitment Communication and Outreach from CTC.*

*During the pre-service meeting, instructors were reminded that the college syllabus must be provided to the students and used in the classroom. It was also noted that syllabi may be personalized; however, only additions, no deletions, can be made. All instructors are required to submit their syllabus to the college. The syllabi will be kept on file and used in future classroom visits. The Director also reviewed college certification dates, withdrawal dates, grading policy, and the instructor's handbook (previously created to ensure teachers were aware of CTC and the Texas Higher Education Coordinating Board Policies). These meetings set the stage for the upcoming year and all stakeholders were receptive and eager to enforce the requirements.*

*Central Texas College has made the commitment to provide specific point of contacts for the districts to ensure maximum success of our students and to ensure that all state, federal, and accreditation regulations are followed.*

*The person responsible for the implementation of the corrective action is Deputy Chancellor, Distance Learning and Texas Campus Operations. Implementation has occurred and will continue to be monitored and modified as needed.*

***Contract Agreements:***

*CTC agrees with the State Auditor's Office findings relative to contract agreements. No corrective action is necessary.*

***Policies and Procedures:***

*CTC agrees with the State Auditor's Office findings relative to policies and procedures.*

*After reviewing the State Auditor's Office's findings, the Director, Information Technology, has reviewed Information Technology's Service Request Policy and Procedures documents. The Director will be meeting with the Dean, Student Developmental Services, to ensure that the staff is aware and utilizing the proper procedures.*

*All programming changes are moved from the test accounts to the production account upon notification that testing has been successfully completed by the requestor of the change. The IT Developer is responsible for loading program updates to the production account.*

### Management's Response from the Florence Independent School District

*Florence ISD agrees with the recommendation. The district has begun the process of collecting all syllabi for dual credit courses and will have this task accomplished by September 30, 2010. Beginning with the spring semester, 2011, collecting the syllabi for every dual credit course will become a priority, before each course begins. The Dual Credit Teacher and Program Manager is the person responsible for implementing this corrective action. Implementation timeline is September 13 through September 30, 2010.*

### Management's Response from the Killeen Independent School District

*The Killeen Independent School District agrees and will ensure that each high school offering dual credit courses shall retain all course syllabi.*

*The Director of Secondary Curriculum for KISD has met with the counselor at each high school responsible for dual credit offerings to confirm that all course syllabi are on file in the counselors and high school curriculum director's office. Copies are also on file with the Director of Secondary Curriculum for KISD.*

**Districts and High Schools Tested**

As part of the audit of Clarendon College's (College) dual credit program, auditors tested the dual credit programs at Pampa High School in the Pampa Independent School District and Childress High School in the Childress Independent School District.

Clarendon College's (College) dual credit program fully complied with all requirements related to teacher qualifications and policies and procedures. However, the College should improve its processes to ensure that students meet all eligibility requirements, its monitoring and evaluation of dual credit courses and teachers, and its contract agreements with the Childress and Pampa independent school districts (ISDs) for dual credit programs (see text box for information about the ISDs and high schools included in auditors' review).

All dual credit students reviewed met minimum test requirements; however, the College did not ensure that students met other eligibility requirements.

All 97 students reviewed met the minimum standardized test score requirements to take dual credit courses. However, the College did not ensure that the students met other eligibility requirements for enrollment in dual credit courses. Specifically:

- Forty-four (45 percent) of the 97 students tested did not meet the college prerequisites for the dual credit courses in which they enrolled. Title 19, Texas Administrative Code, Section 4.85, states that to be eligible for enrollment in a dual credit course offered by a public college, students must meet all of a college's regular prerequisite requirements designated for that course. While the College is ultimately responsible for ensuring that its dual credit programs comply with all requirements, the high schools in each ISD offering dual credit programs are also responsible for ensuring that students meet all eligibility requirements before they approve the students' enrollment in dual credit courses. Auditors identified dual credit students who did not meet eligibility requirements at high schools in both Pampa ISD and Childress ISD.
- Twenty-four (25 percent) of the 97 students tested did not have supporting documentation showing that the high school and College had approved their enrollment in dual credit courses before the courses began. Many of the approval forms were signed by College personnel up to two years after the student signed the forms. The College did not have a process to review the approval forms to ensure they are complete before the students began the courses. This exception was noted for students at both high schools.
- Of the 43 students who were enrolled in more than two dual credit courses in one semester, 1 student from Childress High School did not demonstrate the required outstanding academic performance prior to enrolling in Fall 2008 semester and Spring semester 2009 dual credit courses. Texas Administrative Code, Title 19, Section 4.85, states that a student shall not take more than 2 dual credit courses in a semester;

however, an exception to that rule may be approved by the principal of the high school and the chief academic officer of the college for students who demonstrate outstanding academic performance and capability (as evidenced by grade point average, test scores, or other assessment indicators).

The College fully complied with all requirements related to teacher qualifications.

The College fully complied with requirements to ensure that teachers were qualified and approved to teach dual credit courses before the start of the courses. Specifically, 21 (95 percent) of 22 dual credit teachers reviewed had the required credentials to teach college level courses. One teacher had not obtained the required master's degree, although the teacher had completed the necessary graduate level hours to teach. According to the guidelines of the Southern Association of Colleges and Schools (SACS), which is the College's accrediting entity, teachers must have completed at least a master's degree and 18 teaching hours in the discipline. Title 19, Texas Administrative Code, Section 4.85, requires higher education institutions to comply with SACS guidelines.

In addition, 21 (95 percent) of the 22 teachers tested were approved according to the College's policies and procedures. One teacher's approval form was missing a signature from the dean of instruction.

Although the College ensured that the dual credit courses offered met college level requirements, it should improve its monitoring and evaluation of dual credit courses and teachers.

All dual credit courses taught at Childress High School and Pampa High School reviewed by auditors were college level courses listed in the *Lower Division Academic Course Guide*, which is the official list of approved courses for general academic transfer that may be offered for state funding by public community and technical colleges in Texas.<sup>4</sup>

However, the College relied upon the high school teachers to perform self-evaluations rather than the College supervising, monitoring, and evaluating dual credit courses and high school teachers to ensure academic rigor. Title 19, Texas Administrative Code, Section 4.85, requires a higher education institution to supervise and evaluate dual credit courses and teachers to ensure that dual credit courses are equivalent to courses taught on the higher education institution's main campus in "curriculum, materials, instruction, and method/rigor of student evaluation."

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<sup>4</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

Contract agreements between the College and the ISDs to provide dual credit courses did not include all of the elements required by the Texas Administrative Code.

The contract agreements between the College and the Childress and Pampa ISDs did not include 5 of the 12 elements tested that are required by Title 19, Texas Administrative Code, Section 4.84 (see Appendix 2 for a complete list of the required elements). Specifically, the required elements missing from the contract agreements reviewed included:

- Eligible courses – The contract agreements did not list the dual credit courses.
- Student eligibility – The contract agreements did not fully address student eligibility.
- Faculty supervision – The contract agreements did not address faculty supervision.
- Faculty evaluation process – The contract agreements did not address the evaluation for dual credit program faculty.
- Academic policies – The contract agreements did not include the academic policies for the dual credit program.

The College created a general contract agreement that did not include all requirements in the Texas Administrative Code. In addition, the contract agreement between the College and the Childress ISD was not signed by either party before the dual credit courses started. Texas Administrative Code, Title 19, Section 4.84(a), requires that dual credit contract agreements be signed before the courses begin.

The ISDs fully complied with all requirements related to policies and procedures.

Pampa ISD's and Childress ISD's policies and procedures related to offering dual credit courses included all 12 elements tested that are required by the Texas Administrative Code and Texas Education Code.

The College did not have sufficient password controls and user access controls over its student information system.

Auditors identified weaknesses in the password management controls and user access controls over the student information system the College used to enroll students in dual credit courses. Specifically, 26 (93 percent) of 27 user accounts tested had inappropriate levels of access, 3 (11 percent) of 27 user accounts tested had weak password requirements, and 2 (7 percent) of 27 user accounts users had inappropriate access to register students. Title 1, Texas Administrative Code, Section 202.70, requires higher education institutions to protect vital assets against unauthorized access, as well as to assure the

availability, integrity, utility, authenticity, and confidentiality of information. If the College does not have sufficient access controls over its student information system, there is increased risk that sensitive data may be manipulated, destroyed, or misused.

Because of the control weaknesses, auditors could not rely on the data in the College's student information system for the purposes of this audit. Instead, auditors tested hard-copy documentation from the College and the ISDs to determine whether the College complied with dual credit program requirements.

## Recommendations

Clarendon College should:

- Document that all students have required approvals prior to enrolling the students in dual credit courses and retain this documentation, which should identify the approving parties and the date of approval.
- Ensure that students meet all prerequisite requirements prior to approving the students' enrollment in dual credit courses.
- Ensure that all teachers have the required educational credentials before being approved to teach dual credit courses, and that all approval forms are signed.
- Develop and implement a policy that outlines a process to monitor and evaluate dual credit courses and teachers. This should include:
  - ♦ Regular monitoring and evaluation of dual credit teachers to ensure that the instruction provided is at the college level. This could include regular observation and evaluation of high school dual credit courses by senior teachers in the corresponding discipline at the College.
  - ♦ Regular monitoring of dual credit courses, including a review of all syllabi used, to ensure that the curriculum, materials, and rigor of the course are equivalent to that of a course offered at the main campus of the College.
- Ensure that its dual credit agreements include all of the elements required by the Texas Administrative Code and are signed by representatives of both parties prior to the offering of dual credit courses.
- Review all access accounts and ensure that it grants access based on the users' job duties. As part of this, the College should periodically review user access to its student information system.

- Ensure that all user accounts have strong password requirements that comply with the information security standards in Title 1, Texas Administrative Code, Chapter 202.

The Childress Independent School District should:

- Ensure that high schools offering dual credit to students verify all prerequisite requirements prior to approving the students' enrollment in the related dual credit courses.
- Obtain and properly document all required approvals related to student eligibility requirements.

The Pampa Independent School District should:

- Ensure that high schools offering dual credit to students verify all prerequisite requirements prior to approving the students' enrollment in the related dual credit courses.
- Obtain and properly document all required approvals related to student eligibility requirements.

#### Management's Response from Clarendon College

*Clarendon College concurs with the SAO and has modified the dual credit / concurrent enrollment application and approval process to ensure all guidelines and approvals are followed in accordance with policy and procedure. Specifically the Enrollment Service Counselor and Coordinator of Admissions separately review each dual credit / concurrent student's application packet prior to acceptance and subsequent enrollment to make sure the forms are filled out completely and signed by the appropriate individuals. Additionally all dual credit / concurrent student's registration forms are checked to make sure all pre-requisite as well as co-requisite requirement are met prior to being enrolled in a dual credit / concurrent course.*

*The Dean of Instruction has implemented a new procedure which does not allow teachers to teach dual credit until their official transcripts have been received and evaluated by Clarendon College. Enrollment services has put in place a more effective method of insuring that approval forms are signed before the start of every class by the Dean of Instruction.*

*For Clarendon College to improve its monitoring and evaluation of dual credit courses, the Board of Regents approved Policy 3881, Dual Credit Faculty Evaluations, on August 19, 2010. This policy requires a college faculty member to attend at least one class taught for dual credit by a master degreed high school teacher for the purpose of performing a peer-faculty*

*evaluation and student evaluation. The dual credit teacher will be provided immediate feedback from the individual performing their peer evaluation with the student evaluation results being sent to them at the start of the next semester. The dual credit teacher will also be required to perform a self evaluation.*

*A letter was sent to all area high schools and dual credit teachers' explaining this new policy. These letters included copies of the peer evaluation, student evaluations and self-evaluation forms. Full time instructors from the college have been assigned to evaluate dual credit high school teachers starting fall 2010.*

*In order to ensure that the contract agreements between Clarendon Colleges and the ISD's include all 12 required elements, the existing contract agreement was rewritten. A cover letter explaining the reasons for issuing new contract agreements was mailed along with the contract agreements on August 3, 2010 to all 16 participating high schools to sign. These contract agreements will be approved by the ISD's and returned to Clarendon College before the start of the Spring 2010 semester.*

*Clarendon College created an IT Change Management Procedure that outlines how user's access is created, edited, deleted and reviewed. The College recently replaced the POISE Student Information System from ESP with CAMS Enterprise from Three Rivers Systems. This system provides greater user permission control. Also, access control will be reviewed every six months as mandated by the College's new IT Change Management Policy and Computer Procedure.*

*Since Clarendon College has changed Student Information Systems, we have limited the number of accounts that still have access to POISE. Individuals needing access to POISE must email the Director of IT or the Registrar stating the reason for needing access.*

*All passwords in POISE have been updated to include strong password requirements. Clarendon College plans to write a password policy and implement it by the end of Fall 2010.*

## **Management's Response from the Childress Independent School District**

*Childress ISD concurs with the recommendation. The district will:*

- 1. Ensure that there is verification that all dual credit students have prerequisite requirements prior to enrollment in the related dual credit courses.*
- 2. Obtain and properly document all required approvals related to student eligibility requirements.*

*Person responsible for implementing corrective action will be the Childress High School Counselor. Date of implementation: 9/7/2010*

#### **Management's Response from the Pampa Independent School District**

***The Pampa Independent School District should ensure that high schools offering dual credit to students verify all prerequisite requirements prior to approving the students' enrollment in the related dual credit courses:***

*Pampa ISD agrees with the recommendation. Pampa High School will ensure that all prerequisite requirements required by Clarendon College will be verified prior to student enrollment with Clarendon College. Pampa High School will make every effort to work closely with Clarendon College to ensure that students have met the correct criteria to ensure their success in the dual credit courses. Pampa High School requests that information regarding the prerequisites for each course be provided to the Pampa High School counseling staff by Clarendon College prior to student enrollment in dual credit courses.*

*Persons responsible for implementing correction action: The PHS Principal and PHS Counselor. Date of implementation: Spring 2011 dual credit enrollment.*

***The Pampa Independent School District should obtain and properly document all required approvals related to students' eligibility requirements:***

*Pampa Independent School District agrees with the recommendation. The procedure for dual Credit enrollment between Pampa High School and Clarendon College has been as follows:*

*Clarendon College staff comes to the PHS campus in May and December to pre-enroll students for the Fall and Spring semesters respectively. The students complete the application process and the course selection sheet. Clarendon College takes the applications/course selection sheets with them at that time. Clarendon College sends a list of enrolled students to the PHS counselor. She and her staff gather transcripts and TAKS data for each student. The Clarendon College Enrollment Services Counselor brings all applications and early admission forms to PHS and the PHS Counselor signs them at that time. The Clarendon College Enrollment Services Counselor also picks up and signs for the transcripts/TAKS scores at this time.*

*In August and January, students are actually **enrolled** in dual credit classes. Both Clarendon College and PHS check and reconcile class roles to ensure that students are enrolled in the correct classes.*

*Any new students must go to Clarendon College to enroll and must bring any necessary forms to PHS for the PHS Counselor to sign and pick up any necessary data from PHS to return to Clarendon College to complete the enrollment process.*

*The district attests that the counselors at Pampa High School will ensure that copies of the student applications/course election sheets, early admissions forms and Clarendon College enrollment forms are made and kept in the PHS counselors' office. The Pampa High School counselors will check the dates on the original forms before they are copied to ensure that the dates are correct.*

*Persons responsible for implementing corrective action: PHS Principal/PHS Counselor. Date of Implementation: Spring 2011 dual credit enrollment*

### Districts and High Schools Tested

As part of the audit of Dallas County Community College District - Cedar Valley College's (College) dual credit program, auditors tested the dual credit programs at DeSoto High School in the DeSoto Independent School District and Cedar Hill High School in the Cedar Hill Independent School District.

Dallas County Community College District - Cedar Valley College's (College) dual credit program fully or substantially complied with all requirements related to student eligibility, policies and procedures, and its contract agreements with the DeSoto and Cedar Hill independent school districts (ISDs) (see text box for information about the ISDs and high schools included in auditors' review). However, the College should improve its processes to ensure that teachers are approved prior to the start of dual credit courses and its monitoring and evaluation of dual credit courses and teachers.

The College fully complied with all requirements related to student eligibility.

The College fully complied with requirements to ensure that students were eligible to enroll in dual credit courses. Specifically, all 89 students reviewed met the eligibility requirements and had completed all required prerequisites for the dual credit courses in which they were enrolled.

The College also ensured that most students were approved to take dual credit courses. However, the approval forms prepared by DeSoto High School in the DeSoto ISD for 5 (5.6 percent) of the 89 students had the incorrect semester checked.

The College ensured that all dual credit teachers reviewed had the required educational credentials; however, the College did not approve all of the teachers before the start of the dual credit courses.

The College ensured that all seven dual credit teachers reviewed had the required educational credentials to teach dual credit courses in compliance with the Texas Administrative Code and the Southern Association of Colleges and Schools (SACS), which is the College's accrediting entity.

For 6 (86 percent) of 7 dual credit teachers reviewed, the College either did not approve the teachers before the courses began or it lacked supporting documentation for the dates of the approvals. Specifically, the College did not approve 3 (43 percent) of the 7 teachers reviewed before the dual credit courses they were teaching began. Additionally, auditors could not determine the dates of approval for 3 (43 percent) of the 7 teachers because the approval forms were missing from the documentation. If the College does not review and approve all teachers before courses begin, there is an increased risk that unqualified teachers could teach dual credit courses.

Although the College ensured that the dual credit courses offered met college level requirements, it should improve its monitoring and evaluation of dual credit courses and teachers.

All of the dual credit courses offered by the College and two ISDs reviewed were included in the *Lower Division Academic Course Guide Manual*, which

is the official list of approved courses for general academic transfer that may be offered for state funding by public community and technical colleges in Texas.<sup>5</sup>

However, the College did not consistently monitor or evaluate dual credit courses to ensure that the academic rigor of the courses is at the college level in compliance with state requirements. The College uses a standard appraisal form to evaluate dual credit teachers; however, the College could provide documentation of a completed evaluation for the teachers of only 1 (5 percent) of 19 courses tested. In addition, the College did not have a written policy that outlines a process for monitoring and evaluating the academic rigor of dual credit courses. Title 19, Texas Administrative Code, Section 4.85, requires the higher education institutions to supervise and evaluate dual credit courses and teachers to ensure that dual credit courses are equivalent to courses taught on the higher education institution's main campus in "curriculum, materials, instruction, and method/rigor of student evaluation."

In addition, for dual credit courses taught on the high school campuses, the College stated that it provided teachers with standard syllabi to use as a guideline to help ensure that dual credit courses at the high schools are equivalent to courses taught at the College with regard to curriculum, materials, instruction, and rigor. However, the ISDs could not provide auditors with copies of the syllabi used for the majority of dual credit courses tested. If the high schools do not retain copies of the syllabi used, the College's ability to evaluate a course's curriculum is limited. Specifically:

- The DeSoto ISD could not provide 6 (86 percent) of 7 syllabi requested.
- The Cedar Hill ISD could not provide 9 (90 percent) of 10 syllabi requested.

The College substantially complied with all requirements related to contract agreements.

The contract agreements between the College and the DeSoto and Cedar Hill ISDs contained 11 of the 12 elements tested that are required by Title 19, Texas Administrative Code, Section 4.84 (see Appendix 2 for a complete list of the required elements). Specifically, the contract agreements did not include a list of eligible dual credit courses that the College agreed to provide. High schools were made aware of eligible courses informally through e-mails and phone calls.

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<sup>5</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

The ISDs fully complied with all requirements related to policies and procedures.

DeSoto and Cedar Hill ISDs' policies and procedures related to offering dual credit courses included all 12 elements tested that are required by the Texas Administrative Code and Texas Education Code.

The College had sufficient general and application controls over its student information system.

The College had sufficient general and application controls over the student information system it used to enroll students in dual credit courses. As a result, data from that system was reliable for the purposes of this audit.

## Recommendations

Dallas County Community College District – Cedar Valley College should:

- Review all dual credit student approval documentation that ISDs submit for accuracy and completeness.
- Approve dual credit teachers before the start of the dual credit courses and ensure that this approval is documented.
- Develop and implement a policy that outlines a process to monitor and evaluate dual credit courses and teachers. This should include:
  - ♦ Regular monitoring and evaluation of dual credit teachers to ensure that the instruction provided is at the college level. This could include regular observation and evaluation of high school dual credit courses by senior teachers in the corresponding discipline at the College.
  - ♦ Regular monitoring of dual credit courses, including a review of all syllabi used, to ensure that the curriculum, materials, and rigor of the course are equivalent to that of a course offered at the main campus of the College.
- Ensure that its dual credit agreements include all of the elements required by the Texas Administrative Code, including a list of all dual credit courses approved to be offered.

The DeSoto Independent School District should:

- Review all student applications and approval forms for dual credit courses to ensure that the forms are complete and accurate before submitting the information to the College.
- Ensure that high schools offering dual credit courses retain all course syllabi for dual credit courses.

The Cedar Hill Independent School District should ensure that high schools offering dual credit courses retain all course syllabi for dual credit courses.

Management's Response from Dallas County Community College District - Cedar Valley College

**Responses to Audit Concerns**

1. **Concern:** Review all dual credit student approval documentation that ISDs submit for accuracy and completeness.

**Response:** Cedar Valley College Management agrees, and the Executive Director of P-16 Programs will be responsible for implementation. The enrollment process for dual credit includes a lengthy application and six other documents. All the documentation was correct except for the enrollment forms from one high school which had the wrong semester checked.

**Action Plan:** The Dual Credit Department staff has met and reviewed the importance of making sure that all documentation is done correctly and special attention will be paid to the semester checked on the enrollment forms. Additionally, the Registrar's Office which inputs students into classes has pledged to be more diligent in checking all documentation. This has already been implemented. Finally, the Dual Credit Department will add a sentence to the student instruction form that reminds students to be sure they have checked the right semester. This will be completed before registration for the Spring 2011 semester.

2. **Concern:** Approve dual credit teachers before the start of the dual credit classes and ensure that this approval is documented.

**Response:** Cedar Valley College Management agrees and the Vice-President for Instruction will be responsible for seeing to it that this is accomplished. All instructors were approved prior to the beginning of the semester, but the approval forms were not all signed before the semester began.

**Action Plan:** The Dual Credit Department has had discussions with the Division Deans, and all have pledged to make certain that all that teachers, who teach dual credit at the high schools, are approved prior to the beginning of the semester, and also ensure that the approval forms are signed and on file. This issue will be discussed at the next VPI Direct Reports Meeting, and was implemented this semester, Fall 2010.

3. **Concern:** Develop and implement a policy that outlines a process to monitor and evaluate dual credit courses and instructors. This should include:

*Regular monitoring and evaluation of dual credit teachers to ensure that the instruction provided is at the college level. This could include regular observation and evaluation of high school dual credit classes by senior instructors in the corresponding discipline at the College.*

**Response:** Cedar Valley College Management agrees, and the Vice-President of Instruction will be responsible for implementation, and he will ensure that the Instructional Division Deans formally evaluate every instructor annually. The Dallas County Community College District has a policy that all instructors of record must undergo a formal evaluation annually.

**Action Plan:** The Dual Credit Department has met with the instructional deans and agrees to make the lists of all dual credit instructors and contact information available to the divisions before Oct. 1 of each fall semester. Deans have pledged that all instructors of record, whether on campus or off, will be evaluated annually, and this item will be discussed in detail at the next discipline coordinator's meeting, and all dual credit instructors will be evaluated before the end of the spring 2011 semester. (Note: As a consequence of these discussions all dual credit instructors were evaluated during the 2009-2010 academic year.)

4. **Concern:** Regular monitoring of dual credit courses, including a review of all syllabi used, to ensure that the curriculum, materials, and rigor of the class are equivalent to that of a course offered at the main campus of the College.

**Response:** Cedar Valley College Management agrees, and the Vice-President of Instruction will be responsible for implementation, and he will ensure that the Instructional Division Deans will provide sample syllabi for each dual credit class.

**Action Plan:** The Dual Credit Department will work with the Instructional Divisions to provide contact information for each instructor and ensure that all received sample syllabi for every dual credit course. The Instructional Divisions will be responsible for evaluating the actual syllabi turned in by the dual credit instructors and keeping them on file. This topic will also be on the agenda for the next discipline coordinator's meeting, and will be fully implemented during the Fall 2010 semester.

5. **Concern:** Ensure that its dual credit agreements include all of the elements required by the Texas Administrative Code, including a list of all dual credit courses approved to be offered.

**Response:** Cedar Valley College Management agrees, and the Executive Director of P-16 Programs will be responsible for implementation. The college did have a list of the courses that were being offered for dual

*credit, but that list was not recorded on “Attachment A” as required by the contract.*

**Action Plan:** *The Dual Credit Department will ensure that all contracts have the required “Attachment A” listed and on file. This will be implemented as soon as all classes are input for each semester beginning with the Fall 2010 term.*

#### **Management’s Response from the DeSoto Independent School District**

*The first recommendation was to review all student applications and approval forms for dual credit courses to ensure that the forms are complete and accurate before submitting the information to the college. We agree with the recommendation, and the Assistant Principal at DeSoto High School is the person who will review that process and make adjustments to ensure accuracy before submittal of all forms.*

*The second and last recommendation was to ensure that the high school should retain all course syllabi for dual credit courses. We agree with this recommendation, and the Assistant Principal will ensure that all syllabi are kept on file for dual credit courses taught in the last five years.*

#### **Management’s Response from the Cedar Hill Independent School District**

*Cedar Hill ISD agrees with the recommendation. The district will ensure that offered dual credit courses will retain all course syllabi for dual credit courses. Person responsible for implementing corrective action: The Dean of Instruction. Date of implementation: October 1, 2010.”*

## ***Dallas County Community College District - Richland College***

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### **Districts and High Schools Tested**

As part of the audit of Dallas County Community College District - Richland College's (College) dual credit program, auditors tested the dual credit programs at Lake Highlands High School in the Richardson Independent School District and at the Richland Collegiate High School of Mathematics, Science, and Engineering, which is a charter school.

Dallas County Community College District - Richland College's (College) dual credit program fully or substantially complied with all requirements related to teacher qualifications and monitoring and evaluation.

However, the College did not ensure that the Richland Collegiate High School of Mathematics, Science, and Engineering documented the required outstanding academic performance by students taking more than two dual credit courses in a semester as required. In addition, the College did not ensure that its contract agreement with the Richardson Independent School District (ISD) was signed before offering dual credit courses (see text box for information about the ISDs and high schools included in auditors' review). The College also did not have a contract agreement with the Richland Collegiate High School of Mathematics, Science, and Engineering, which is a charter school operated by the College. Also, the Richland Collegiate High School of Mathematics, Science, and Engineering did not have documented policies and procedures related to its dual credit program.

The College ensured that students completed all requirements to be eligible to enroll in dual credit courses; however, the College should improve its documentation of the outstanding academic performance of students enrolled in more than two dual credit courses.

All 99 students whom auditors reviewed met minimum test requirements and completed all prerequisites needed to be eligible to take the dual credit courses in which they were enrolled. However, the College lacked documentation showing the required outstanding academic performance and capability for 17 (31 percent) of 55 students taking more than two dual credit courses in a semester at the Richland Collegiate High School of Mathematics, Science, and Engineering. Title 19, Texas Administrative Code, Section 4.85, requires students taking more than two dual credit courses in a semester to demonstrate "outstanding academic performance and capability (as evidenced by grade-point average, ACT or SAT scores, or other assessment indicators)." In addition, Richland Collegiate High School of Mathematics, Science, and Engineering did not have a documented process for approving students' enrollment in more than two dual credit courses per semester.

The College fully complied with all requirements related to teacher qualifications.

The College fully complied with requirements to ensure that teachers were qualified and approved to teach dual credit courses before the start of the courses. Specifically, 49 (98 percent) of 50 teachers reviewed had the required educational credentials to teach dual credit courses in compliance

with the Texas Administrative Code and the College's accrediting entity. One teacher was approved to teach a journalism course before the teacher had completed 18 graduate hours in that discipline. The College allows teachers to be approved to teach dual credit courses before they have attained the required educational levels if the College has approved a professional development plan for the teacher. However, this policy does not comply with the guidelines by the Southern Association of Colleges and Schools, which requires that teachers must have completed at least a master's degree and 18 teaching hours in the discipline; or with Title 19, Texas Administrative Code, Section 4.85, which requires the higher education institution to comply with SACS guidelines.

In addition, 2 (4 percent) of 50 dual credit teachers reviewed began teaching courses before they were approved to teach the courses.

The College's dual credit program fully complied with all requirements related to monitoring and evaluation of dual credit programs.

All of the dual credit courses offered by the College and two ISDs reviewed were included in the *Lower Division Academic Course Guide Manual*, which is the official list of approved courses for general academic transfer that may be offered for state funding by public community and technical colleges in Texas.<sup>6</sup> In addition, the College regularly monitors and evaluates dual credit courses and teachers to ensure that the course material is being taught at the college level in compliance with state requirements. In addition, the College had approved all dual credit courses that auditors reviewed.

While the College ensured that its contract agreement with the Richardson ISD included all of the required elements tested, it did not have a contract agreement with the Richland Collegiate High School of Mathematics, Science, and Engineering.

The contract agreements reviewed between the College and the Richardson ISD contained all of the elements required by Title 19, Texas Administrative Code, Section 4.84 (see Appendix 2 for a complete list of the required elements). However, the 2009-2010 contract agreement was not signed by representatives of both parties prior to the start of the dual credit courses. In addition, the 2008-2009 contract was not signed by the College prior to the courses starting. Title 19, Texas Administrative Code, Section 4.84, requires contract agreements to be approved before the offering of dual credit courses. College management stated that the contracts were signed after courses began because of delays caused by legal reviews.

In addition, the College did not have a contract agreement with Richland Collegiate High School of Mathematics, Science, and Engineering because that high school is a charter school created by the College. However, Title 19,

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<sup>6</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

Texas Administrative Code, Section 4.84, requires a contract agreement to be developed and approved between a public school district or private secondary school and the higher education institution prior to offering dual credit courses.

While the Richardson ISD's policies and procedures included all of the elements required, the Richland Collegiate High School of Mathematics, Science, and Engineering did not have documented policies and procedures for its dual credit program.

The Richardson ISD's policies and procedures regarding dual credit included all of the elements required by the Texas Administrative Code and Texas Education Code. However, the Richland Collegiate High School of Mathematics, Science, and Engineering did not have documented policies and procedures for its dual credit program with the College.

The College had sufficient general and application controls over its student information system.

The College had sufficient general and application controls over the student information system it used to enroll students in dual credit courses. As a result, data from that system was reliable for the purposes of this audit.

## Recommendations

Dallas County Community College District - Richland College should:

- Ensure that students have specific approvals from their high school principal and the College's chief academic officer prior to enrolling them in more than two dual credit courses per semester.
- Amend its policy for approving teachers of dual credit courses to ensure that it approves only teachers who meet all of the minimum requirements established by SACS, as required by the Texas Administrative Code.
- Ensure that it approves all dual credit teachers before the dual credit courses start.
- Develop a contract agreement with the Richland Collegiate High School of Mathematics, Science, and Engineering to offer dual credit courses. This contract agreement should include all of the elements required by the Texas Administrative Code and Texas Education Code.
- Ensure that its dual credit agreements with ISDs are executed and signed by representatives of both parties prior to the offering of dual credit courses.

The Richland Collegiate High School of Mathematics, Science, and Engineering should:

- Establish a process to identify and document students' outstanding academic performance and capability to ensure that students meet all requirements prior to being allowed to enroll in more than two dual credit courses per semester.
- Develop documented policies and procedures for its dual credit program with the College.

Management's Response from Dallas County Community College District - Richland College and the Richland Collegiate High School of Mathematics, Science, and Engineering

***1. Ensure that students have specific approvals from their high school principal and the College's chief academic officer prior to enrolling them in more than two dual credit courses per semester.***

*The Texas Education Agency approved Richland Collegiate High School (RCHS) as a dual-credit only open enrollment charter high school for 11th and 12th grade high school students in May 2006. By design and approval authority to grant the high school diploma and college credit, all RCHS students must be enrolled in more than two dual credit courses each semester. Richland Collegiate High School and Richland College have co-established an additional process to document students' outstanding academic performance and capability. The process ensures that students meet the Texas Administrative Code requirements prior to being allowed by Richland College to enroll in more than two dual credit courses per semester. The collegiate high school principal and college chief academic officer review and approve via signature student eligibility to enroll in more than two dual credit courses each semester.*

*Persons responsible for implementing corrective action: Superintendent – Richland Collegiate High School and Richland College Interim Vice President for Teaching and Learning.*

*Date of implementation: August 19, 2010*

*Richland College's regular dual credit program also developed an outstanding academic performance and capability criteria verification process for each dual credit student requesting to enroll in more than two dual credit courses per semester. The ISD high school principal and college chief academic officer review the criteria documented and approve via signature student eligibility to enroll in more than two dual credit courses each semester.*

*Persons responsible for implementing corrective action: Richland College Dual Credit Coordinator and Richland College Interim Vice President for Teaching and Learning*

*Date of implementation: August 19, 2010*

**2. Amend its policy for approving teachers of dual credit courses to ensure that it approves only teachers who meet all of the minimum requirements established by SACSCOC, as required by the Texas Administrative Code.**

*Richland College is consistently enforcing its faculty credentialing policy to ensure that all dual credit instructors meet the minimum requirements established by SACSCOC, as required by the Texas Administrative Code, prior to the first class day. The appropriate Richland College academic dean documents, reviews, and approves faculty eligibility to teach the specified course prior to the first class day.*

*Persons responsible for implementing corrective action: Richland College School Academic Deans and Richland College Interim Vice President for Teaching and Learning*

*Date of implementation: July 1, 2010*

**3. Ensure that it approves all dual credit teachers before the dual credit courses start.**

*Richland College is consistently enforcing its policy on timely approval of faculty credentialing documentation to ensure all dual credit instructors have met the minimum requirements established by SACSCOC, as required by the Texas Administrative Code, prior to the first class day. The policy requires the appropriate Richland College school academic dean complete approval documentation prior to the first class day.*

*Persons responsible for implementing corrective action: Richland College School Academic Deans and Richland College Interim Vice President for Teaching and Learning*

*Date of implementation: August 1, 2010*

**4. Develop a contract agreement with the Richland Collegiate High School of Mathematics, Science, and Engineering to offer dual credit courses. This contract agreement should include all of the elements required by the Texas Administrative Code and Texas Education Code.**

*Richland Collegiate High School (RCHS) and Richland College have an application/agreement that was approved in May 2006 by the Texas State Board of Education, the Texas Education Agency's Charter School Division, and the Dallas County Community College District's and Richland Collegiate High School's Board of Trustees. RCHS and Richland College review the application/agreement on a yearly basis and amend it as appropriate under the Texas Administrative Code Title 19 Chapter 100.1033. In addition to the application/agreement, Richland Collegiate High School developed a dual*

*credit agreement between the high school and Richland College which was initially approved by the Dallas County Community College District's Board of Trustees in August 2006. Richland College will submit an update to this agreement to the Board of Trustees at the October 5, 2010 meeting.*

*Person responsible for implementing corrective action: Superintendent – Richland Collegiate High School*

*Date of implementation: September 3, 2010*

***5. Ensure that its dual credit agreements with school districts are executed and signed by representatives of both parties prior to the offering of dual credit courses.***

*Richland College is consistently enforcing its policy that all dual credit agreements be fully executed prior to the first class day.*

*Persons responsible for implementing corrective action: Dual Credit Coordinator and Superintendent – Richland Collegiate High School*

*Date of implementation: August 19, 2010*

**Districts and High Schools Tested**

As part of the audit of El Paso Community College's (College) dual credit program, auditors tested the dual credit programs at Montwood High School in the Socorro Independent School District and Clint High School in the Clint Independent School District.

El Paso Community College's (College) dual credit program fully complied with all requirements related to student eligibility, teacher qualifications, and policies and procedures. However, the College should improve its monitoring and evaluation of dual credit courses and teachers and its contract agreements with the Clint and Socorro independent school districts (ISDs) for dual credit programs (see text box for information about the ISDs and high schools included in auditors' review).

The College fully complied with all requirements related to student eligibility.

The College fully complied with requirements to ensure that students were eligible and approved to enroll in dual credit courses. Specifically, all 100 students tested met eligibility and prerequisite requirements for the dual credit courses in which they were enrolled.

The College fully complied with all requirements related to teacher qualifications.

The College fully complied with requirements to ensure that teachers were qualified and approved to teach dual credit courses before the start of the courses. Specifically, all 22 dual credit teachers tested had the required educational credentials to teach dual credit courses in compliance with the Texas Administrative Code and the guidelines of the Southern Association of Colleges and Schools, which is the College's accrediting entity. In addition, all 34 teachers completed the same hiring process as regularly employed faculty members of the College, and the College approved all 34 teachers before the dual credit courses began.

Although the College ensured that the dual credit courses offered met college level requirements, the College should improve its monitoring and evaluation of dual credit courses and teachers.

All of the dual credit courses offered by the College and the two ISDs reviewed were included in the *Lower Division Academic Course Guide Manual*, which is the official list of approved courses for general academic transfer that may be offered for state funding by public community and technical colleges in Texas.<sup>7</sup>

While the College monitors the course content and instruction of dual credit courses taught at the high schools to ensure that the courses are taught at the college level, the College does not do so on a consistent basis. Specifically, 8 (32 percent) of 25 dual credit courses reviewed were not evaluated as scheduled by the College's policy. The College's dual credit policy requires that dual credit teachers be evaluated periodically. The College's policy on

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<sup>7</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

adjunct faculty members, who sometimes teach dual credit courses, requires an evaluation to be conducted only once every two years if the faculty member has taught at the College for at least 10 semesters within a 6-year period. Those same requirements apply to high school teachers who teach dual credit courses. However, those 8 teachers were not evaluated according to the College's policy.

If it does not consistently perform evaluations, the College cannot ensure that the academic rigor of the dual credit courses is at the college level in accordance with the College's policies and procedures.

The College's contract agreements with the two ISDs tested did not include all of the elements required by the Texas Administrative Code.

The contract agreements between the College and the Socorro and Clint ISDs did not include 8 of 12 elements tested required by Texas Administrative Code, Title 19, Section 4.84 (see Appendix 2 for a listing of all required elements). Specifically, the required elements missing from the contract agreements reviewed included:

- Eligible courses - The contract agreements did not define eligible courses.
- Student eligibility - The contract agreements did not define student eligibility.
- Student composition of courses - The contract agreements did not address or define the expected student composition of courses.
- Course curriculum - The contract agreements did not address course curriculum.
- Course instruction - The contract agreements did not define course instruction.
- Course grading - The contract agreements did not define course grading.
- Academic policies - The contract agreements did not address academic policies.
- Student support services - The contract agreements did not address student support services.

In addition, the contract agreements between the College and both ISDs tested were signed after the start of the dual credit courses. Texas Administrative Code, Title 19, Section 4.84, requires dual credit agreements to be approved by the governing boards or designated authorities (for example, the high school's principal and chief academic officer) prior to the offering of such courses.

The ISDs fully complied with all requirements related to policies and procedures.

The Socorro and Clint ISDs' policies and procedures regarding dual credit contained all the elements required by the Texas Administrative Code and Texas Education Code.

The College did not have sufficient password management controls, user access controls, and change management controls over its student information system.

Auditors identified weaknesses in the password management controls and user access controls over the student information system the College used to enroll students in dual credit courses.

To minimize the risks associated with public disclosure, auditors communicated the details regarding those issues in writing directly to the College.

In addition, database administrators and programmers had access to compile and implement code in the student information system, which increases the risk of unauthorized changes to the system.

As a result of these weaknesses, the data in the College's student information system was not reliable for the purposes of this audit. Instead, auditors tested hard-copy documentation to determine whether the College was complying with dual credit program requirements.

## Recommendations

El Paso Community College should:

- Ensure that it monitors and evaluates dual credit courses in compliance with its dual credit policies and procedures. This should include evaluations of adjunct faculty members teaching dual credit courses.
- Ensure that its dual credit agreements with ISDs include all of the elements required by the Texas Administrative Code.
- Ensure that it complies with its password policies for all passwords.
- Create policies and procedures to ensure that all users have the appropriate level of system access for their assigned job duties.
- Implement adequate segregation of duties by removing database administrators' and programmers' access to the student information system's production environment.

## Management's Response from El Paso Community College

*El Paso Community College should:*

***- Ensure that it monitors and evaluates dual credit courses in compliance with its dual credit policies and procedures. This should include evaluations of adjunct faculty members teaching dual credit courses.***

### **Response:**

*Agree with recommendation*

*Responsible person: Vice President of Instruction*

*Timeline: Fall 2010*

*In order to verify compliance with its dual credit policies and procedures regarding evaluations of adjunct faculty members teaching dual credit courses, the Vice President of Instruction will require the Division Dean's office responsible for the creation and management of a dual credit course section to adhere to the following:*

- *Update the list of dual credit faculty every semester (all faculty are evaluated in their first semester of service).*
- *Using a standardized form, all Division Offices will track the semester when the faculty member is required to be evaluated: once a year for five years and every other year thereafter.*
- *At the beginning of every semester, the Division Office will notify the appropriate Instructional Coordinator that an evaluation of a part-time instructor is due.*
- *The evaluation cycle (student evaluation review, self evaluation, classroom evaluation and composite evaluation) will be completed by the end of the semester.*
- *At the end of each semester, all Division Offices managing dual credit will submit a copy of the updated list of the dual credit faculty evaluation schedule and a copy of the composite evaluation (which documents all aspects of the evaluation cycle) to the Vice President of Instruction, who will audit compliance.*

***- Ensure that its dual credit agreements with school districts include all of the elements required by the Texas Administrative Code.***

**Response:**

*Agree with recommendation*

*Responsible person: Interim Vice President of Student Services*

*Timeline: September 2010*

*The "Interlocal Agreement" has been revised and approved pending agreement signatures which will be obtained by the end of September 2010. The new name is "Dual Credit Partnership Agreement" and will become effective once all signatures are obtained. The agreement will remain in effect for three years. The new Dual Credit Partnership Agreement includes all of the elements required by the Texas Administrative Code.*

***- Ensure that EPCC complies with its password policies for all passwords.***

**Response:**

*Agree with recommendation*

*Responsible Person: Interim Vice President/CIO, Information Technology*

*Timeline: December 2010*

*EPCC documentation containing specifications for passwords was reviewed for accuracy and consistency and is being updated to reflect the policy for password change requirements, including: age, complexity, history, and length. While these parameters have been in effect for all students and new employees since January, 2005, during this current semester these password configuration requirements will be extended to the remaining faculty and staff. Also this semester, we are applying the same password policy to our enterprise administrative system, Sungard/SCT's Banner System. Both upgrade projects will be completed by the end of the Fall Semester, December, 2010.*

***- Create policies and procedure to ensure that all users have the appropriate level of access for their assigned job duties.***

**Response:**

*Agree with recommendation*

*Responsible Person: Interim Vice President/CIO, Information Technology*

*Timeline: December 2010*

*Reporting tools are being designed and will be made available for Data Owners to review who has access to Banner objects containing sensitive*

*personal information. Data Owners will have the information needed to be able to specify the access level required by the tasks associated with a specific position. Guidance documentation is being prepared to provide Data Owners and Custodians with a process describing how to review requests for access and evaluate the justification for the request. These actions will be completed by December, 2010.*

***- Implement an adequate segregation of duties by removing database administrator' and programmer's access to the student information system's production environment.***

**Response:**

*Agree with recommendation*

*Responsible Person: Interim Vice President/CIO, Information Technology*

*Timeline: Summer 2011*

*While current staffing levels prevent an immediate and complete compartmentalization of administrator functions EPCC will begin, at the task level, to distribute some production server administrative functions to the Servers Team, which has server administration responsibilities for all other EPCC servers. Also, some of the programmer access to the production environment has already been removed. Because of the scope of this change, the transfer of these functions will, necessarily, proceed very deliberately. We anticipate this process to require until the Summer Semester, 2011.*

**Districts and High Schools Tested**

As part of the audit of Hill College's (College) dual credit program, auditors tested the dual credit programs at Cleburne High School in the Cleburne Independent School District and Grandview High School in the Grandview Independent School District.

Hill College's (College) dual credit program fully complied with all requirements related to student eligibility and policies and procedures. However, the College should improve its documentation of teachers approvals, its monitoring and evaluating of dual credit courses and teachers, and its contract agreements with the Cleburne and Grandview independent school districts (ISDs) (see text box for information about the ISDs and high schools included in auditors' review).

The College fully complied with all requirements related to student eligibility.

The College fully complied with requirements to ensure that students were eligible and approved to enroll in dual credit courses. Specifically, all 100 students reviewed met eligibility requirements and had completed all prerequisites for the dual credit courses in which they were enrolled. In addition, all of the students were approved in compliance with Texas Administrative Code requirements and the College's policies and procedures.

While the College ensured that all dual credit teachers reviewed had the required educational credentials, it lacked sufficient documentation showing that it approved the teachers before the start of the dual credit courses.

The College ensured that all 14 dual credit teachers reviewed had the required educational credentials to teach dual credit courses in compliance with the Texas Administrative Code and the Southern Association of Colleges and Schools (SACS), which is the College's accrediting entity. However, auditors could not determine whether the College had approved 11 (79 percent) of the 14 teachers before the dual credit courses they were teaching began because the Adjunct Faculty Checklist the College used to approve the teachers did not include a date approved field.

Although the College ensured that the dual credit courses offered met college level requirements, it should improve its monitoring and evaluation of dual credit courses and teachers.

All of the dual credit courses offered by the College and two ISDs reviewed were included in the *Lower Division Academic Course Guide Manual*, which is the official list of approved courses for general academic transfer that may be offered for state funding by public community and technical colleges in Texas.<sup>8</sup>

However, the College did not consistently monitor and evaluate teachers and courses to ensure that the courses are taught at the college level. While the College had policies related to the monitoring and evaluation of dual credit teachers, those policies did not specify the frequency of evaluations or the

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<sup>8</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

procedures that should be followed. The College lacked documentation showing that evaluations had been performed for 7 (78 percent) of the 9 teachers reviewed at Cleburne High School and for 1 (20 percent) of the 5 teachers reviewed at Grandview High School.

Title 19, Texas Administrative Code, Section 4.85, requires higher education institutions to supervise and evaluate dual credit courses and teachers to ensure that dual credit courses are equivalent to courses taught on the higher education institution's main campus in "curriculum, materials, instruction, and method/rigor of student evaluation." If the College does not consistently monitor and evaluate dual credit courses and teachers, it cannot ensure that the academic rigor of dual credit courses is at college level in compliance with state requirements.

Contract agreements between the College and the ISDs to provide dual credit courses did not contain all of the elements required by the Texas Administrative Code.

The contract agreements between the College and the Cleburne and Grandview ISDs did not include 4 of 12 elements tested as required by Title 19, Texas Administrative Code, Section 4.84 (see Appendix 2 for a list of all the required elements). Specifically, the required elements missing from the contract agreements reviewed included:

- Eligible courses defined – The contract did not list the dual credit courses.
- Faculty supervision addressed – The faculty supervision process described in the contract agreements was vague.
- Faculty evaluation process – The faculty evaluation process described in the contract agreements was vague.
- Academic policies – The contract agreements did not address academic policies for the dual credit program.

The College used a standardized contract agreement template that did not include all elements required by the Texas Administrative Code. Without ensuring that its contract agreements contain required elements, the College faces increased risk of misunderstandings with the ISDs regarding the dual credit program.

The ISDs fully complied with all requirements related to policies and procedures.

The Cleburne and Grandview ISDs' policies and procedures regarding dual credit contained all of the elements required by the Texas Administrative Code and Texas Education Code.

The College did not have sufficient user access controls over its student information system.

Auditors identified weaknesses in the user access controls over the student information system the College used to enroll students in dual credit courses. Specifically, auditors identified 10 user accounts that had not logged into that system in the past 6 months and 35 user accounts that may have had a level of access that was not required for the users to complete their job duties. Title 1, Texas Administrative Code, Chapter 202, requires higher education institutions to protect vital assets against unauthorized access, as well as to assure the availability, integrity, utility, authenticity, and confidentiality of information. If the College grants inappropriate access to its student information system, there is increased risk that sensitive data may be manipulated, destroyed, or misused.

As a result, the data in the student information system was not reliable for the purposes of this audit. Instead, auditors tested hard-copy documentation to determine whether the College was complying with dual credit program requirements.

## Recommendations

Hill College should:

- Include a date approved field in the Adjunct Faculty Checklist form used to approve teachers of dual credit courses.
- Develop, implement, and document a formal process to evaluate course rigor and teachers instructing dual credit courses to ensure that course material is being taught at the college level. This policy should include the method and frequency for monitoring and evaluating dual credit courses and teachers.
- Ensure that its template for dual credit contract agreements with ISDs includes all of the elements required by the Texas Administrative Code.
- Review all user accounts to its student information system to ensure that users are granted access rights appropriate for their job duties.

## Management's Response from Hill College

*Recommendation: Hill College should include a date-approved field in the Adjunct Faculty Checklist form used to approve teachers of dual credit courses.*

***HC RESPONSE:*** *Hill College approves all faculty credentials prior to the start of classes; however, the college agrees that documentation was lacking*

approval dates in some instances. Beginning in the fall 2009 semester, the Adjunct Faculty Checklist included a date-approved field. The Vice President of Instruction is responsible for ensuring ongoing compliance.

Recommendation: The College should develop, implement, and document a formal process to evaluate course rigor and teachers instructing dual credit courses to ensure that course material is being taught at the college level. This policy should include the method and frequency for monitoring and evaluating dual credit courses and teachers.

**HC RESPONSE:** Hill College monitors and evaluates faculty and courses according to the Board of Regent Policies governing the institution. Hill College evaluates Dual Credit courses in the same manner and with the same rigor as all of its courses:

- Faculty classroom evaluations by students and supervisors are performed on a periodic basis.
- Student learning outcomes are continually assessed via the college's embedded assessment processes at both the course and program level.
- Dual Credit courses use the same master syllabi as other Hill College courses.

In response to this audit, the Vice President of Instruction will oversee a review of current practice and development of procedures that outline all measures the college takes and will take to ensure Dual Credit courses continue to be taught at college level. Specifically, procedures will outline the method and frequency for monitoring and evaluating dual credit courses and faculty.

Recommendation: Hill College should ensure that its template for dual credit agreements with school districts include all of the elements required by the Texas Administrative Code.

**HC RESPONSE:** Hill College will update its dual credit agreements with all existing ISD partners to include all elements required by the Texas Administrative Code. The Vice President of Instruction is responsible for implementing this corrective action and ensuring ongoing compliance.

Recommendation: Hill College should review all user accounts to its student information system to ensure that users are granted access rights appropriate for their job duties.

**HC RESPONSE:** Hill College has conducted a comprehensive review of all user accounts in our student information system and made modifications accordingly to ensure compliance. Modifications completed thus far include the following:

- *Identified, reviewed, deactivated and removed accounts not accessed within a six months time-period.*
- *Reviewed and set user account privileges to the minimum level of access required for their job duties as recommended by our software company. Set all user accounts to expire in 90 days.*
- *Deployed a centrally managed and more stringent Password Policy to require a minimum of eight characters, one uppercase character, one lowercase character and two numbers in a user's password. No unique character may be repeated in a sequence more than two times.*
- *Contracted with a third party entity to enforce compliance and ensure that security guidelines, rules, regulations and policies as defined by the institution are not circumvented.*
- *Reviewed user accounts with Associate VP of Information Technology, Human Resources and the Instructional Dean's office for any terminations or changes in employee employment status.*
- *Modified the internal process to include user account review and sign-off on a quarterly basis by the Associate VP of Information Technology as well as require sign-off of all user accounts needing extra privileges or higher levels of access by this same administrator.*

*The Associate Vice President of Information Technology is responsible for overseeing these corrective actions and ensuring ongoing compliance.*

**Districts and High Schools Tested**

As part of the audit of Kilgore College's (College) dual credit program, auditors tested the dual credit programs at Sabine High School in the Sabine Independent School District and Longview High School in the Longview Independent School District.

Kilgore College's (College) dual credit program fully complied with all requirements related to student eligibility, teacher qualifications, and policies and procedures. However, the College should improve its monitoring and evaluation of dual credit courses and its contract agreements with the Longview and Sabine independent school districts (ISDs) for dual credit programs (see text box for information about the ISDs and high schools included in auditors' review).

**The College fully complied with all requirements related to student eligibility.**

The College fully complied with requirements to ensure that students were eligible to enroll in dual credit courses. Specifically, all 99 students reviewed met the eligibility and prerequisite requirements for the dual credit courses for which they were registered. The College also ensured that most students were approved to take dual credit courses. However, 3 (3 percent) of 99 dual credit approval forms processed by Longview and Sabine high schools did not contain all of the required approval signatures or the date of approval. Title 19, Texas Administrative Code, Section 74.25, requires students to have the approval of the high school principal or other school official to be eligible to enroll in dual credit courses. Because approval forms were not signed or dated, the high schools could not provide documentation to support whether those three students were approved to enroll in dual credit courses before the courses started.

**The College fully complied with all requirements related to teacher qualifications.**

The College fully complied with requirements to ensure that teachers were qualified and approved to teach dual credit courses before the start of the courses. Specifically, all 17 dual credit teachers reviewed had the educational credentials to teach dual credit courses in compliance with the Texas Administrative Code and the guidelines of the Southern Association of Colleges and Schools (SACS), which is the College's accrediting entity.

**Although the College ensured that the dual credit courses offered met college level requirements, it did not consistently monitor and evaluate teachers to ensure academic rigor of dual credit courses.**

All of the dual credit courses offered by the College and two ISDs reviewed were included in the *Lower Division Academic Course Guide Manual*, which is the official list of approved courses for general academic transfer that may be offered for state funding by public community and technical colleges in Texas.<sup>9</sup> Also, all 14 dual credit course syllabi tested from dual credit courses

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<sup>9</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

taught at the high schools matched the course syllabi from corresponding courses offered at the College's main campus.

However, the College did not evaluate 1 (7 percent) of 15 dual credit teachers as scheduled by the College's *Faculty Handbook*. The teacher had not been evaluated since the Spring 2007 semester. Title 19, Texas Administrative Code, Section 4.85, requires a higher education institution to supervise and evaluate dual credit teachers using the same or comparable procedures used for faculty at the higher education institution's main campus. If the College does not consistently review dual credit teachers, it cannot ensure that the academic rigor of a dual credit course is at the college level in compliance with state requirements.

Contract agreements between the College and the ISDs did not include all of the elements required by the Texas Administrative Code.

The contract agreements between the College and the Longview and Sabine ISDs did not include 4 of the 12 elements tested that are required by Title 19, Texas Administrative Code, Section 4.84 (see Appendix 2 for a complete list of the required elements). Without ensuring that its contract agreements contain all required elements, the College faces an increased risk of misunderstandings with the ISDs regarding the dual credit program. The required elements missing from the contract agreements reviewed included:

- Eligible courses – The contract agreements did not define eligible courses.
- Student eligibility – The contract agreements did not clearly define student eligibility requirements.
- Course grading – The contract agreements did not clearly define course grading.
- Academic policies – The contract agreements did not address academic policies for dual credit courses.

In addition, the contract agreement between the College and the Longview ISD was not signed by both parties. The agreement between the College and the Sabine ISD was signed by both parties; however, the contract agreement did not include a date approved. The College, Longview ISD, and Sabine ISD could not provide support to show the contract agreements were signed before dual credit courses started. Title 19, Texas Administrative Code, Section 4.84, requires contract agreements to be approved by the College and the ISDs prior to the offering of dual credit courses. Also, the copies of the contract agreement differed between the College and the Sabine ISD.

The ISDs fully complied with all requirements related to policies and procedures.

The Longview and Sabine ISDs' policies and procedures regarding dual credit contained all of the elements required by the Texas Administrative Code and the Texas Education Code.

The College had sufficient general and application controls over its student information system.

The College had sufficient general and application controls over the student information system it used to enroll students in dual credit courses. As a result, data from the student information system was reliable for the purposes of this audit.

## Recommendations

Kilgore College should:

- Ensure that students have all required approvals documented prior to enrolling them in dual credit courses.
- Ensure that teachers are monitored and evaluated according to the schedule in its *Faculty Handbook*.
- Ensure that its contract agreements with ISDs include all of the elements required by the Texas Administrative Code.
- Ensure that contract agreements are signed by representatives of both parties prior to the offering of dual credit courses, and that both parties to a contract agreement are operating from the same written document.

The Sabine Independent School District should ensure that all approval signatures and dates are documented.

The Longview Independent School District should ensure that all approval signatures and dates are documented.

## Management's Response from Kilgore College

*Kilgore College agrees with the findings of the report and will implement appropriate corrective action for each recommendation identified in the Audit. The College's dual credit program will continue to comply with all requirements related to student eligibility, teacher qualifications, and policies and procedures. The College will improve its monitoring and evaluation of dual credit courses and its contractual agreements for dual credit programs.*

**Recommendation #1:** Kilgore College should ensure that students have all required approvals documented prior to enrolling them in dual credit courses as required in Title 19, Texas Administrative Code, Section 74.25.

**Response to Recommendation #1:** The Kilgore College Dual Credit Registration Form requires each student to have approval of a high school principal or other school official. Because three of the 99 forms processed (3%) did not contain required approval signatures or the date of approval, the Kilgore College Office of Admissions and Records has reviewed procedures and retrained the appropriate dual credit staff to ensure that appropriate signatures, with approval dates, will be filed for each student. Our Registrar and Director of Admissions will be responsible for implementation of corrective action beginning with the Fall semester, 2010.

**Recommendation #2:** Kilgore College should ensure that instructors are monitored and evaluated according to the schedule in its Faculty Handbook.

**Response to Recommendation #2:** The Kilgore College Faculty Handbook requires that each dual credit teacher be evaluated by an appropriate supervisor at least once every two years, including a classroom visit and subsequent conference. Because one of the fifteen dual credit teachers reviewed (7%) had not been evaluated within the two year window, the Kilgore College Instructional Council has reviewed the policy and determined that all teachers will be appropriately evaluated in future semesters to ensure that the academic rigor of a dual credit course is at the college level in compliance with state requirements. Our Vice President of Instruction will be responsible for implementation of corrective action beginning with the Fall semester, 2010.

**Recommendation #3:** Kilgore College should ensure that its dual credit agreements with school districts include all of the elements required by the Texas Administrative Code.

**Response to Recommendation #3:** Kilgore College has agreements with each of its school districts, but the Audit determined that the agreements did not include four of the twelve elements required by Title 19, Texas Administrative Code, Section 4.84. The Kilgore College Instructional Council has approved a new agreement for each school district that adds the elements missing from the previous contract agreement. In addition to previous elements required by the Texas Administrative Code, the new agreements will: 1) define eligible dual credit courses, 2) clearly define student eligibility requirements, 3) clearly define course grading, and 4) address academic policies for dual credit courses. Our Dean of Instructional Outreach will be responsible for implementation of corrective action during the Fall semester, 2010.

**Recommendation #4:** Kilgore College should ensure that agreements are signed by representatives of both parties prior to the offering of dual credit

*courses, and that both parties to an agreement are operating from the same written document.*

***Response to Recommendation #4:*** *Kilgore College has required that agreements be obtained from each school district prior to offering dual credit courses. An appropriate signature by one superintendent was missing and an approval date in another agreement was missing as determined by the Audit. In accordance with Title 19, Texas Administrative Code, Section 4.84, Kilgore College will ensure that all agreements with school districts have appropriate signatures prior to offering dual credit courses. Additional care will be taken to ensure that the College and each school district are working with identical agreements. Our Vice President of Instruction will be responsible for implementation of corrective action during the Fall semester, 2010.*

#### **Management's Response from the Sabine Independent School District**

*Sabine ISD agrees with the findings of the report and will implement appropriate corrective action for the recommendation identified in the Audit. The School District will improve its monitoring of signatures and dates of all dual credit approval forms.*

*Each dual credit approval form will receive a comprehensive review prior to submission to Kilgore College Admissions Office. The Sabine High School Student Support Services Administrator will be responsible for implementing this corrective action beginning with the Fall semester, 2010.*

#### **Management's Response from the Longview Independent School District**

*Longview Independent School District concurs with the recommendations found in the audit regarding Dual-Credit Enrollment between Longview High School and Kilgore College. The district will take the following actions in regards to the findings. The Dean of Students will oversee implementations.*

- 1. We will monitor the process of application and qualifications for student placement in Kilgore College for Dual Credit purposes. This action has taken place and was in place as of the date of August 31, 2010.*
- 2. All required signatures have been submitted with application and registration forms. When such forms have not been finalized, Kilgore College returned such forms to the Dean of Students in August requiring the Dean of Students' signature before being accepted.*

*The Longview ISD agrees with the finding and recommendations regarding the contract between Kilgore and Longview ISD.*

*The agreement has been signed by both parties and filed as of August 30, 2010.*

*The agreement will include the elements:*

- *Eligible Courses*
- *Student Eligibility – This is printed on all registration forms.*
- *Course Grading – These will be presented to student with a Course Syllabus – August 23, 2010*

**Districts and High Schools Tested**

As part of the audit of Odessa College's (College) dual credit program, auditors tested the dual credit programs at Permian High School in the Ector County Independent School District and Seminole High School in the Seminole Independent School District.

Odessa College's (College) dual credit program fully complied with all requirements related to student eligibility and policies and procedures. However, the College should improve its documentation of teacher approvals, its monitoring and evaluation of its dual credit courses and teachers, and its contract agreements with the Ector County and Seminole independent school districts (ISDs) for dual credit programs (see text box for information about the ISDs and high schools included in auditors' review).

**The College fully complied with all requirements related to student eligibility.**

The College fully complied with requirements to ensure that students were eligible to enroll in dual credit courses. Specifically, 97 (99 percent) of 98 students reviewed met the eligibility requirements and prerequisites for the dual courses in which they were enrolled. One student at Permian High School enrolled in two courses that required the student to obtain a score of 3 or above on the the essay portion of the Texas Assessment of Knowledge and Skills (TAKS); however, the student obtained a score of 2. However, officials at the College and Permian High School approved this student's enrollment in the dual credit courses, which did not comply with the eligibility requirements in Title 19, Texas Administrative Code, Section 4.85.

The College also ensured that most students were approved to take dual credit courses. However, 1 (1 percent) of 98 student files reviewed did not contain a copy of the approved enrollment form. This student met minimum eligibility requirements and prerequisites to enroll in dual credit courses; however, auditors could not determine whether the high school had formally approved this student for dual credit courses. Title 19, Texas Administrative Code, Section 74.25, requires approval of the high school principal or other school official to be eligible to enroll in dual credit courses.

The College ensured that all dual credit teachers reviewed had the required educational credentials; however, it did not approve all of the teachers before the start of dual credit courses.

All 12 dual credit teachers reviewed had the required educational credentials to teach college level courses in compliance with the Texas Administrative Code and the guidelines of the Southern Association of Colleges and Schools (SACS), which is the College's accrediting entity. However, the College did not approve 1 (8 percent) of the 12 teachers until approximately 3 months after the teacher had begun teaching a dual credit course. In addition, the College could not provide documentation to show that 4 (33 percent) of 12 teachers reviewed were approved before those teachers had begun teaching the dual credit courses. If the College does not review and approve all teachers before courses begin, there is an increased risk that unqualified teachers could teach dual credit courses.

Although the College ensured that the dual credit courses offered met college level requirements, the College should improve its monitoring and evaluation of its dual credit courses and teachers.

All of the dual credit courses offered by the College and two ISDs reviewed were included in the *Lower Division Academic Course Guide Manual*, which is the official list of approved courses for general academic transfer that may be offered for state funding by public community and technical colleges in Texas.<sup>10</sup>

However, the College did not sufficiently monitor and evaluate its dual credit program to ensure that courses and the instruction provided were at the college level. Individual departments at the College may conduct monitoring activities for courses in their discipline. However, the College does not conduct any site visits or classroom observations. Instead, dual credit students at the high schools tested evaluate their dual credit courses each semester. In addition, the College has not developed formal written procedures for the monitoring and evaluation of dual credit courses and teachers to ensure that courses are taught at a college level. Title 19, Texas Administrative Code, Section 4.85, requires the higher education institutions to supervise and evaluate dual credit courses and teachers to ensure that dual credit courses are equivalent to courses taught on the higher education institution's main campus in "curriculum, materials, instruction, and method/rigor of student evaluation." If the College does not adequately monitor and evaluate dual credit courses and teachers, it cannot ensure that the academic rigor of the dual credit courses is at the college level in compliance with state requirements.

In addition, auditors reviewed the syllabi for selected courses provided by the high school to dual credit students and compared them to the College's syllabi for the same courses. Twenty-one (88 percent) of 24 syllabi for the dual high school credit courses tested did not match the syllabi for similar courses offered at the College's main campus. College management stated that each department can provide dual credit teachers with sample lesson plans as a guideline. However, the College does not have written policies or procedures requiring a review of dual credit course syllabi. By reviewing the syllabi, the College could help ensure that dual credit courses taught at the high schools are comparable to similar courses taught on the College's main campus.

Contract agreements between the College and the ISDs to provide dual credit courses included all of the elements required by the Texas Administrative Code; however, the contract agreements were not signed.

The contract agreements between the College and the Ector County and Seminole ISDs included all 12 elements tested that are required by Title 19,

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<sup>10</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

Texas Administrative Code, Section 4.84 (see Appendix 2 for a complete list of the required elements). However, the contract agreement between the College and the Ector County ISD for the 2007-2008 school year was not signed by representatives of either the College or the ISD. That contract agreement was then carried over to the 2008–2009 school year. Title 19, Texas Administrative Code, Section 4.84, requires contract agreements for dual credit programs to be signed prior to the beginning of dual credit courses.

The ISDs fully complied with all requirements related to policies and procedures.

The Ector County and Seminole ISDs’ policies and procedures related to offering dual credit courses included all of the elements required by the Texas Administrative Code and Texas Education Code.

The College did not have sufficient password management controls and change management controls over its student information system.

Auditors identified weaknesses in the password management controls and user access controls over the student information system the College used to enroll students in dual credit courses. Specifically, the College did not consistently enforce its password policies. In addition, the College had inadequate separation of duties for managing changes made in its student information system. Programmers could create changes and move them into the production environment, and they tested all changes. The College also lacked policies and procedures addressing change management.

As a result of these issues, data in the student information system was not reliable for the purposes of this audit. Instead, auditors tested hard-copy documentation to determine whether the College was complying with dual credit program requirements. Title 1, Texas Administrative Code, Chapter 202, requires higher education institutions to take measures to protect vital information and manage access to information resources.

## Recommendations

Odessa College should:

- Ensure that all relevant documents are maintained for its dual credit students.
- Develop written procedures for the selection and approval of dual credit teachers. This includes ensuring that teachers are approved prior to when they start teaching dual credit courses and retaining documentation of approvals.
- Develop, implement, and document a formal process to monitor and evaluate dual credit courses taught at the high schools to ensure they are

taught at the college level. This should include a review of dual credit course syllabi to ensure that the syllabi are equivalent to similar courses taught at the main campus.

- Ensure that its dual credit agreements with ISDs are executed and signed by representatives of both parties prior to the offering of dual credit courses.
- Enforce its password policies and ensure that the policies require the incorporation of all of the elements for strong passwords from the Department of Information Resources' guidelines.
- Create a change management policy for its student information system that ensures adequate segregation of duties and testing for all changes made.

The Ector County ISD should ensure that it verifies student test scores before finalizing enrollment application decisions for dual credit courses.

**Management's Response from Odessa College**

*Please accept the table below that incorporates the Institution's Formal Responses to the Dual Credit Audit. We will begin writing and implementing plans that need to be in place prior to our spring registration.*

<b>Recommendation</b>	<b>Decision</b>	<b>Plan of Action</b>	<b>Person Responsible</b>	<b>Date of Completion</b>
<i>Ensure that all relevant documents are maintained for its dual credit students.</i>	<i>Agree</i>	<i>Odessa College will initiate and document a process that clearly states where all relevant documents for Dual Credit Students are maintained. Additionally, this plan will clearly outline how eligibility requirements will be documented to ensure compliance with Title 19, Texas Administrative Code, Section 4.85. Included will be a plan of action that requires written approval by authorized parties' on appropriate forms, and those forms be filed, before a high school student may enroll in Dual Credit classes.</i>	<i>Registrar and collegeNow (Dual Credit) Director</i>	<i>11-1-10</i>

<b>Recommendation</b>	<b>Decision</b>	<b>Plan of Action</b>	<b>Person Responsible</b>	<b>Date of Completion</b>
<i>Develop written procedures for the selection and approval of dual credit teachers. This includes ensuring that teachers are approved prior to when they start teaching dual credit classes and retaining documentation of approvals.</i>	<i>Agree</i>	<i>The Plan of Action is to clearly document the process of how a teacher applies to teach dual credit classes for Odessa College; what the definitive steps are that the teacher must take to submit credentials; and exactly how those credentials are assessed and approved, including generating the SOQ (Summary of Faculty Qualifications). This process will allow Odessa College to review and approve all Dual Credit teachers prior to their start date of employment. Included in this Plan will be the determination of where all credentials and SOQs will permanently reside.</i>	<i>Dean of Arts and Sciences and Vice President for Instruction and Chief Academic Officer</i>	<i>10-1-10</i>
<i>Develop, implement, and document a formal process to monitor and evaluate dual credit courses taught at the high schools to ensure they are taught at the college level. This should include a review of dual credit course syllabi to ensure that the syllabi are equivalent to similar courses taught at the main campus.</i>	<i>Agree</i>	<i>The College will generate a plan that provides formal written procedures for monitoring Dual Credit courses; for the evaluation of those courses; and evaluation of Dual Credit teachers. The Plan will provide standards and measures to ensure that the academic rigor of Dual Credit courses is in compliance with State Requirements. Additionally, the plan will include written procedures requiring review of Dual Credit course Syllabi to ensure that they are comparable to courses taught at the main campus of Odessa College.</i>	<i>Dean of Arts and Sciences, Dean of Nursing and Allied Health, Dean of Career, Technical, and Workforce Education</i>	<i>1-10-11</i>
<i>Ensure that its dual credit agreements with school districts are executed and signed by representatives of both parties prior to</i>	<i>Agree</i>	<i>The College will write and document a plan that ensures that all dual credit agreements are signed and executed prior to the offering of dual credit classes. Included in this plan will be a timeline for signing such</i>	<i>collegeNow (Dual Credit) Director and Vice President for Instruction</i>	<i>10-15-10</i>

<b>Recommendation</b>	<b>Decision</b>	<b>Plan of Action</b>	<b>Person Responsible</b>	<b>Date of Completion</b>
<i>the offering of dual credit courses.</i>		<i>agreements; who the appropriate parties are to sign the agreements from the College/ISDs; and an explanation in regard to the circumstances an agreement could be changed and by whose authority.</i>		
<i>Enforce its password policies and ensure that the policies require the incorporation of all of the elements for strong passwords from the Department of Information Resources Guidelines.</i>	<i>Agree</i>	<i>The College has a password policy, as stated in the Use of Computer Resources Policy in section 4.2.2. The College will write and implement an action to enforce the above policy.</i>	<i>Chief Information Officer and Director of Data Processing/ Colleague</i>	<i>1-10-11</i>
<i>Create a change management policy for its student information system that ensures adequate segregation of duties and testing for all changes made.</i>	<i>Agree</i>	<i>IT at Odessa College will generate a Change Management Policy, which will outline policies and procedures that separate duties for managing changes in its student information system.</i>	<i>Chief Information Officer and Director of Data Processing/ Colleague</i>	<i>1-10-11</i>

**Management's Response from Ector County Independent School District**

*Ector County Independent School District agrees with the recommendation of the audit of the dual credit program. The district will complete the following actions ensuring that verification of student test scores are finalized before enrollment decisions are made for dual credit classes:*

<b><i>Action to be Completed</i></b>	<b><i>Personnel Responsible</i></b>	<b><i>Date of Implementation</i></b>
<b><i>Dual credit admissions training for high school counselors provided by Odessa College admissions staff.</i></b>	<i>Director of Guidance and Counseling, Admissions staff at Odessa College</i>	<i>By November 30, 2010</i>
<b><i>Develop written, step by step dual credit enrollment guidelines for parents, students and staff member use</i></b>	<i>Director of Guidance and Counseling; Instructional Services Director at Permian High; College Counselor at Permian High; Academic Counselor at Permian High</i>	<i>By November 30, 2010</i>
<b><i>Student's test scores (TAKS, THEA, or Compass) will be attached to each dual credit registration application.</i></b>	<i>College Counselor and Academic Counselors at Permian High School</i>	<i>Prior to finalizing enrollment application decisions for dual credit (each semester)</i>

**Districts and High Schools Tested**

As part of the audit of Panola College's (College) dual credit program, auditors tested the dual credit programs at Center High School in the Center Independent School District and Joaquin High School in the Joaquin Independent School District.

Panola College's (College) dual credit program fully complied with all requirements related to teacher qualifications and policies and procedures. However, the College should improve its processes to ensure that students meet all eligibility requirements and are approved to enroll in dual credit courses prior to the courses starting, its monitoring and evaluation of dual credit courses, and its contract agreements with the Center and Joaquin independent school districts (ISDs) for dual credit programs (see text box for information about the ISDs and high schools included in auditors' review).

All dual credit students reviewed met minimum test requirements; however, the College did not ensure that students met all prerequisites.

All 77 students reviewed met eligibility requirements for the dual credit courses for which they were registered. In addition, the seven students who were enrolled in more than two dual credit courses in one semester had all of the required approvals to take the additional courses.

However, 24 (55 percent) of 44 students who registered for dual credit courses with prerequisites did not meet the prerequisites. The prerequisite exceptions were the result of a conflict between the sequences of courses offered at Center High School and at the College. The course sequence at Center High School allowed students to enroll in a course prior to completing a College prerequisite course.

In addition, early admission forms for dual credit courses also did not include dates; as a result, auditors could not determine whether the high schools approved the students to participate in dual credit courses before the courses began.

The College fully complied with all requirements related to teacher qualifications.

All 13 teachers reviewed had the appropriate educational credentials to teach their respective dual credit courses in compliance with the Texas Administrative Code and the guidelines of the Southern Association of Colleges and Schools (SACS), which is the College's accrediting entity. In addition, all 13 teachers underwent the same approval procedures as faculty at the College's main campus.

Although the College ensured that the dual credit courses offered met college level requirements, it did not have documented policies or procedures for the monitoring and evaluation of dual credit courses.

All of the dual credit courses offered by the College and two ISDs reviewed were included in the *Lower Division Academic Course Guide Manual*, which is the official list of approved courses for general academic transfer that may

be offered for state funding by public community and technical colleges in Texas.<sup>11</sup> In addition, the four dual credit teachers tested were monitored and evaluated by the College. All of the dual credit courses at the high schools also had syllabi that matched syllabi for similar courses taught at the College's main campus.

However, the College did not monitor or evaluate dual credit courses. If the College does not adequately monitor and evaluate dual credit courses, it cannot ensure that the academic rigor of the dual credit courses is at the college level in compliance with state requirements.

Contract agreements between the College and the ISDs to provide dual credit courses did not include all of the elements required by the Texas Administrative Code.

The contract agreements between the College and the Center and Joaquin ISDs did not include 11 of the 12 elements tested that are required by Title 19, Texas Administrative Code, Section 4.84 (see Appendix 2 for a complete list of the required elements). Specifically, the required elements missing from the contract agreements reviewed included:

- Eligible courses defined – The contract agreements did not define or address eligible courses.
- Location of course – The contract agreements did not address the location of the dual credit courses.
- Student composition of courses – The contract agreements did not define or address the expected student composition of dual credit courses.
- Faculty selection process – Although the College's policies and procedures address a faculty selection process for dual credit courses, the contract agreements did not include that information.
- Faculty evaluation process – Although the College's policies and procedures address a faculty evaluation process for dual credit courses, the contract agreements did not include that information.
- Faculty supervision process – Although the College's policies and procedures address a faculty supervision process for dual credit courses, the contract agreements did not include that information.
- Course curriculum defined – Although the College's policies and procedures define the dual credit course curriculum, the contract agreements did not include that information.

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<sup>11</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

- Course instruction defined – The contract agreements did not define or address course instruction of dual credit courses.
- Courses grading – Although the College’s policies and procedures address grading of dual credit courses, the contract agreements did not include that information.
- Academic policies – The contract agreements did not define or address academic policies for dual credit courses.
- Student support services – The contract agreements did not define or address student support services for dual credit courses.

Although the contracts agreements between the College and the ISDs were signed by all parties, the contract agreement between the College and the Joaquin ISD was signed by the College after the dual credit courses had started. Title 19, Texas Administrative Code, Section 4.84, requires that contract agreements for dual credit programs must be approved by the governing boards or designated authorities (for example, a school principal and chief academic officer) prior to the offering of such courses.

The ISDs fully complied with all requirements related to policies and procedures.

The Center and Joaquin ISDs’ policies and procedures regarding dual credit contained all of the elements required by the Texas Administrative Code and Texas Education Code.

The College did not have sufficient user access controls over its student information system.

Auditors identified weaknesses in the user access controls over the College’s operating system for the server running the student information system. Specifically, auditors identified seven user accounts that were granted excessive privileges that were not appropriate for the users’ job duties. Also, the College did not perform periodic reviews of access privileges to ensure that access levels are appropriate.

As a result, the data in the College’s student information system was not reliable for the purposes of this audit. Instead, auditors tested hard-copy documentation to determine whether the College was complying with dual credit program requirements. Title 1, Texas Administrative Code, Section 202.75, requires higher education institutions to manage access to information resources to ensure authorized use. If the College grants inappropriate access to its student information systems, there is increased risk that sensitive data may be manipulated, destroyed, or misused.

## Recommendations

Panola College should:

- Ensure that students meet all prerequisite requirements before approving their enrollment in the related dual credit course.
- Ensure that students have all required approvals before enrolling them in dual credit courses. This should include creating a date approved field on the Early Admission Permission Form.
- Develop and implement policies and procedures to monitor or evaluate dual credit courses.
- Ensure that its contract agreements with ISDs for dual credit courses include all of the elements required by the Texas Administrative.
- Ensure that contract agreements are executed and signed by representatives of both parties prior to the offering of courses.
- Ensure that user access privileges are appropriate for a user's job duties, and perform periodic reviews of user access.

The Center Independent School District should:

- Ensure that students meet all of the College's prerequisites prior to approving students to enroll in the related dual credit course.
- Ensure that documentation includes the date of the approval.

The Joaquin Independent School District should ensure that contract agreements are executed and signed prior to the offering of courses.

## Management's Response from Panola College

*Panola College does not disagree with the recommendations of the dual credit audit conducted by the State Auditors' Office.*

*The Vice President of Instruction will be responsible for monitoring the correction of recommendation #1. We have allowed students from some high schools to take ENGL 2322 or ENGL 2323 before ENGL 1302 because of the state's TEKS requirement for high school English. For dual credit students in the high schools that request that exception we have made the adjustment without a published written statement. We have corrected that with a statement in our Dual Credit Partnership Agreement. It is, "In order to meet the TEKS requirements for high school senior English, schools may elect to offer ENGL 2322 or 2323 before students take ENGL 1302. The ENGL 1301 course and the ENGL 2322 or 2323 course would fulfill the TEKS*

*requirements. Therefore, in cases where TEKS is a consideration, a high school doing dual credit with Panola College may choose ENGL 1301 and ENGL 2322 or 2323 and skip the ENGL 1302 prerequisite for ENGL 2322 or 2323. Returning students (dual credit students who have taken ENGL 1301 and ENGL 2322 or 2323 as high school requirements) will be required to take the ENGL 1302 course before taking any more English courses at Panola College.”*

*The Registrar will be responsible for monitoring the correction of recommendation #2. All students will have all required approvals before enrolling in dual credit courses. This will include a date approved field in the Early Admission Permission Form.*

*The Vice President of Instruction, will be responsible for monitoring the correction of recommendation #3. We have developed policies and procedures to monitor or evaluate dual credit courses. Please note in the Dual Credit Partnership Agreement that Panola College is responsible for selecting instructors of dual credit courses. They must have the credentials required for SACS accreditation. Panola College will supervise the instructors and evaluate them at least yearly. Our evaluation instruments (SIR II form and Deans/Directors Evaluation with Classroom Visit Summary) contain information relating to the rigor and equality of the dual credit course in comparison to the regular college course. Both types of courses use the same evaluation forms. In the SIR II instrument sections F, G, and H address the rigor of the course, generally using terms such as more difficult than most, less difficult, or about the same. These answers give the supervisors of dual credit an indication of the difficulty level or rigor of the course being taught in comparison to others taking the same course for college credit only. Our Deans/Directors evaluation instrument contains Section 2, which concerns the Instructional Materials and their use in the classroom. This section addresses (b) the appropriateness of the material, (c) the physical environment – is the classroom conducive to college level teaching, (d) is the college syllabus available for review, and (e) whether or not the lesson being taught is reflected in the syllabus and are specific student learning objectives clearly taught. If a course requires a final examination with imbedded questions to determine mastery of student learning objectives, the high school adjunct uses the same imbedded questions in the final examination. The same is true of any end of course project or portfolio required in a course.*

*In addition to the instruments we use, we also have an adjunct meeting for the high school adjuncts separate from other adjuncts. In this meeting we discuss the requirements for teaching from the Panola College selected textbook and using the Panola College syllabus for the course. The adjuncts then meet with veteran fulltime faculty from their disciplines to discuss assignments and other questions that the adjunct might need clarified. We believe that administering our instruments of evaluation and hosting the adjunct meeting clearly define and monitor that expectations are met.*

*The Vice President of Instruction and the Registrar together monitor that the contract agreements with independent school districts for dual credit classes include all of the elements required by the Texas Administrative Code. All elements are included in the new agreement and are explained.*

*The Registrar is responsible for making sure that all Early Admission Forms are signed and on file prior to offering courses (recommendation #5). The newly revised forms have a box for date received and date processed. In addition, there is a place for the school district to date their signatures. All Dual Credit Partnership Agreements have date lines for both the high schools and the college. Calls are made to all high schools prior to the semester's start to remind all parties to update and submit the forms to the college early.*

*The Information Technology Director is responsible for monitoring user access privileges and their appropriateness. He is also responsible for conducting periodic reviews of user access. New forms and protocols have been instituted at Panola College. Job descriptions are to be attached to the requests for access approval. Measures are in place to insure that changes in duties are reviewed and appropriate access is based upon need for job performance. Yearly reviews are also mandated and will be monitored.*

#### **Management's Response from the Center Independent School District**

*Center Independent School District concurs with recommendation that we should:*

- *Ensure that students meet all of the College's pre-requisites prior to approving students to enroll in the related dual-credit course.*
- *Ensure that the documentation includes the date of approval.*

*The district will develop course descriptions with pre-requisites of all dual-credit course offerings prior to the enrollment period for students. Furthermore, advisory and evaluation from the high school counselor(s) will be conducted prior to enrollment to ensure that students meet the pre-requisites. Consequently, a report of eligible students will be generated and submitted for approval by the high school principal. The report will include a date. Those students who show interest in dual-credit offerings but fail to meet the pre-requisite guidelines will be given ample opportunity to achieve enrollment status but will not be enrolled until all pre-requisites are met. This report will also be dated.*

## Management's Response from the Joaquin Independent School District

*Joaquin Independent School District agrees with the recommendations. The district will ensure that contract agreements are executed and signed prior to the offering of courses.*

*Panola College provided Joaquin Independent School District with a Dual Credit Partnership Agreement that included specific elements of the Texas Administrative Code dealing with Dual Credit issues.*

*Joaquin Independent School District provided Panola College with a Statement of Intent Dual Credit Agreement that will be automatically renewed thereafter for the following year unless one participating institution notifies the other participating institution in writing, May 1st, of the year preceding any change, of its intention to terminate the agreement.*

*These agreements will be updated and signed every year by May 1st.*

*Person responsible for implementing corrective action:*

- *Joaquin High School Superintendent*
- *Joaquin High School Principal*
- *Joaquin High School Counselor*

*Date of Implementation: August 8, 2010*

**Districts and High Schools Tested**

As part of the audit of South Texas College's (College) dual credit program, auditors tested the dual credit programs at La Joya High School in the La Joya Independent School District and McAllen High School in the McAllen Independent School District.

South Texas College's (College) dual credit program fully or substantially complied with all requirements related to monitoring and evaluation and policies and procedures. However, the College should improve its processes to ensure that students are eligible and approved to enroll in dual credit courses, its processes to ensure that teachers are approved to teach prior to the start of dual credit courses, and its contract agreements with the La Joya and McAllen independent school districts (ISDs) for dual credit programs (see text box for information about the ISDs and high schools included in auditors' review).

All dual credit students reviewed were eligible to take dual credit courses; however, the ISDs did not properly approve students to enroll in dual credit courses.

All 103 students tested met minimum test scores to be eligible for dual credit courses. However, 84 (82 percent) of the 103 students tested from both high schools did not have documentation showing that the high schools had approved the students' enrollment in dual credit courses. Also, 19 (18 percent) of the 103 students tested were either 10th graders or taking more than 2 dual credit courses in a semester, both of which require approval by a high school official. However, the approval forms for 19 students did not contain the date of approval. Due to the increased rates of dual credit enrollment, La Joya High School and McAllen High School decided to suspend documentation of the approvals for dual credit enrollment. Title 19, Texas Administrative Code, Section 74.25, requires students to have the approval of the high school principal or other official designated by the school district to be eligible to enroll in dual credit courses. If high schools do not document the approvals of dual credit enrollment, there is an increased risk that ineligible students could enroll in dual credit courses.

In addition, one student from La Joya High School enrolled in a dual credit course without completing a college prerequisite for that course. The high school did not follow the course catalog and allowed the student to take a dual credit course without meeting the course's prerequisite. Title 19, Texas Administrative Code, Section 4.85, requires students to meet a higher education institution's regular prerequisites to enroll in a dual credit course.

Although the College ensured that all dual credit teachers reviewed had the required educational credentials, it lacked documentation showing that it approved the teachers before the start of dual credit courses.

All 44 dual credit teachers reviewed had the required educational credentials to teach dual credit courses in compliance with the Texas Administrative Code and the guidelines of the Southern Association of Colleges and Schools (SACS), which is the College's accrediting entity. However, the College's

notice of employment for adjunct faculty form did not include a date approved field. As a result, auditors could not determine whether the College had approved 13 dual credit teachers at the high school before the dual credit courses they were teaching began. If the College does not review and approve all teachers before courses begin, there is an increased risk that unqualified teachers could teach dual credit courses.

The College substantially complied with all requirements related to monitoring and evaluation.

All of the dual credit courses offered by the College and two ISDs reviewed were included in the *Lower Division Academic Course Guide Manual*, which is the official list of approved courses for general academic transfer that may be offered for state funding by public community and technical colleges in Texas.<sup>12</sup>

However, the College did not consistently monitor dual credit courses and teachers to ensure that the courses were taught at the college level. Specifically, 3 (23 percent) of 13 high school teachers tested did not have documentation showing that the College had evaluated them. Title 19, Texas Administrative Code, Section 4.85, requires the higher education institutions to supervise and evaluate teachers of dual credit courses using the same or comparable procedures used for faculty at the main campus of the higher education institution. The College's *Dual Enrollment Manual for School District Personnel* requires teachers to be evaluated once per semester. If the College does not complete teacher evaluations as scheduled, it cannot ensure that the academic rigor of the dual credit courses is at the college level in compliance with state requirements.

The College's contract agreements with the two ISDs tested did not include all of the elements required by the Texas Administrative Code.

The contract agreement between the College and the La Joya ISD did not include 8 of the 12 elements tested that are required by Title 19, Texas Administrative Code, Section 4.84 (see Appendix 2 for a complete list of the required elements). Specifically, the required elements missing from the contract agreements reviewed between the College and the La Joya ISD included:

- Student eligibility – The contract agreement did not clearly define student eligibility.
- Faculty selection process – The contract agreement did not clearly define faculty selection.

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<sup>12</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

- Faculty supervision – The contract agreement did not address faculty supervision.
- Course curriculum – The contract agreement did not detail the course curriculum.
- Course instruction – The contract agreement did not clearly define expected course instruction.
- Course grading – The contract agreement did not address expected course grading.
- Academic policies – The contract agreement did not address the academic policies for the dual credit program.
- Student support services – The contract agreement did not clearly define the available student support services for the dual credit program.

The contract agreement between the College and the McAllen ISD did not include 10 of the 12 required elements tested. Specifically, the required elements missing from the contract agreements reviewed between the College and the McAllen ISD included:

- Eligible courses – The contract agreement did not address eligible dual credit courses.
- Student eligibility – The contract agreement did not address student eligibility.
- Faculty selection process – The contract agreement did not address faculty selection.
- Faculty supervision – The contract agreement did not address faculty supervision.
- Faculty evaluation – The contract agreement did not address faculty evaluation.
- Course curriculum – The contract agreement did not address course curriculum.
- Course instruction – The contract agreement did not address course instruction.
- Course grading – The contract agreement did not address course grading.
- Academic policies – The contract agreement did not address the academic policies for the dual credit program.

- Student support services – The contract agreement did not address the available student support services for the dual credit program.

Without ensuring that its contract agreements contain all the required elements, the College faces an increased risk of misunderstandings with the ISDs regarding the dual credit program.

The ISDs fully complied with all requirements related to policies and procedures.

La Joya and McAllen ISDs' policies and procedures related to offering dual credit courses included all 12 elements tested that are required by the Texas Administrative Code and Texas Education Code.

The College did not have sufficient password management controls over its student information system.

Auditors identified weaknesses in the password management controls over the student information system the College used to enroll students in dual credit courses. As a result, data in that system was not reliable for the purposes of this audit. Instead, auditors tested hard-copy documentation to determine whether the College was complying with dual credit program requirements.

## Recommendations

South Texas College should:

- Ensure that students have all required, documented approvals prior to enrolling them in dual credit courses. That documentation should include approval dates.
- Ensure that students meet all prerequisites prior to enrolling them in dual credit courses.
- Document the date of its approval of teachers for dual credit courses. This could be done by adding a date approved field in its notice of employment for adjunct faculty form.
- Perform observations and evaluations of all high school teachers who are teaching dual credit courses as required by the College's policies and procedures.
- Ensure that its dual credit agreements with ISDs include all of the elements required by the Texas Administrative Code.
- Ensure that its dual credit agreements with ISDs are executed and signed by representatives of both parties prior to the offering of dual credit courses.

- Develop and implement password policies and procedures that comply with the Department of Information Resources' guidelines and are based on industry best practices.

The La Joya Independent School District should:

- Ensure that students have all required, documented approvals prior to enrolling them in dual credit courses. That documentation should include approval dates.
- Ensure that students meet all prerequisites prior to enrolling them in a dual credit course.

The McAllen Independent School District should ensure that students have all required, documented approvals prior to enrolling them in dual credit courses. That documentation should include approval dates.

### Management's Response from South Texas College

*South Texas College agrees with the recommendations issued in the audit report and will implement appropriate corrective actions for each recommendation in the audit report. The College appreciates the opportunity to review its dual credit program and strengthen controls to ensure that documentation is in place to demonstrate compliance.*

*Since 1997, the College has provided dual credit opportunities to over 35,000 students in Hidalgo and Starr Counties. The College, along with our dual credit partners, look forward to the program's continued expansion and success. In our region, one-half of the adults over age of 25 have less than a ninth grade education. Dual credit programs close the education gaps for Hispanic students in our communities and offer opportunities to access higher education, creating pathways to the middle class.*

***Recommendation 1:*** *Ensure that students have all required, documented approvals prior to enrolling them in dual credit courses. This documentation should include approval dates.*

***Response to Recommendation 1:*** *South Texas College obtains approval and consent from the high school principal and the College's chief academic officer for students who are either 10th graders or are taking more than two (2) dual credit courses. All 103 dual credit students reviewed were eligible to take dual credit courses; however, the approval forms for 19 of the 103 students reviewed did not contain the date of approval. South Texas College's Division of Student Affairs and Enrollment Management will review and strengthen current controls to ensure students have all required, documented approvals, including dates. Approvals and registration will occur prior to the college's census date. Changes in current processes will be effective Spring*

2011. The interim dean of enrollment services will ensure that controls are in place to document required approvals.

**Recommendation 2:** Ensure that students meet all prerequisites prior to enrolling them in a dual credit course.

**Response to Recommendation 2:** South Texas College's Division of Student Affairs and Enrollment Management, screens each prospective dual credit student to ensure that he/she meets the minimum test scores and course prerequisites to be eligible for dual credit courses. All 103 students met minimum test score requirements to be eligible for dual credit; however, one (1) of the 103 students reviewed during the audit sample received program chair approval to be co-enrolled, thus not meeting the published, course prerequisites. South Texas College's Division of Student Affairs and Enrollment Management will continue to ensure that students meet all test scores and course prerequisites prior to enrolling them in a dual credit course. The interim dean of enrollment services will be responsible for strengthening controls to ensure that documentation is in place to demonstrate that students meet all prerequisites effective Fall 2010.

**Recommendation 3:** Document the date of its approval of teachers for dual credit classes. This could be done by adding a date-approved field in its notice of employment for adjunct faculty form.

**Response to Recommendation 3:** South Texas College's Office of High School Programs and Services and the Department of Human Resources reviews all dual credit faculty credentials to ensure that the faculty are in compliance with the Texas Administrative Code and the guidelines of the Southern Association of Colleges and Schools, the College's credentialing entity. All 44 dual credit faculty (high school) reviewed had the required educational credentials to teach dual credit courses in compliance with the Texas Administrative Code and the guidelines of the Southern Association of Colleges and Schools (SACS). The College's current, official notice of employment does not include an approval date; therefore, the audit team could not determine if 13 of the 44 dual credit faculty (high school) were approved before the course began. As a result, South Texas College's Office of High School Programs and Services and Department of Human Resources will modify the adjunct faculty notice of employment to include an approval date. The revised notice of employment will be effective Spring 2011. The associate dean of high school programs and service, and the director of human resources will be responsible for review and modification of the adjunct faculty notice of employment.

**Recommendation 4:** Perform observations and evaluations of all high school teachers who are teaching dual credit classes as required by the College's own policies and procedures.

**Response to Recommendation 4:** *South Texas College substantially complies with all requirements related to monitoring and evaluation. The College monitors and evaluates dual credit high school faculty in accordance with the evaluation procedures outlined in the manual for dual enrollment administrators. Three (3) of the 13 high school dual credit faculty did not have documentation showing that the college evaluated them. As a result, South Texas College's Office of High School Programs and Services will strengthen its current process to ensure that dual credit (high school) faculty are observed and evaluated per the College's current policies and procedures. In addition, the Office of High School Programs and Services will develop a monitoring system to track compliance. The new system will be implemented in Fall 2010. The associate dean of high school programs and services will be responsible for strengthening controls to ensure that documentation is in place to demonstrate that dual credit (high school) faculty are observed and evaluated.*

**Recommendation 5:** *Ensure that its dual credit agreements with school districts include all of the elements required by the Texas Administrative Code.*

**Response to Recommendation 5:** *South Texas College's dual credit Memorandum of Understanding (MOU) addresses the elements required by the Texas Administrative Code including student eligibility, faculty selection, faculty supervision, course curriculum, course instruction, course grading, academic policies and student support services. The MOU is the official agreement between the College and our dual credit partners. During the audit, both the MOUs and Dual Enrollment Course Agreements (DECA), the legal document which delineates academic and fiscal arrangements for the dual credit course, were reviewed. The auditors review determined that the DECA did not contain the required Texas Administrative Code elements. As a result, South Texas College's Office of High School Programs and Services will review and revise the current Dual Enrollment Course Agreement to ensure that it includes all of the elements required. DECA revisions will be implemented in the Spring 2011. The associate dean of high school programs and services will be responsible for ensuring that the DECA includes the elements required by the Texas Administrative Code.*

**Recommendation 6:** *Ensure that its dual credit agreements with school districts are executed and signed by representatives of both parties prior to the offering of dual credit courses.*

**Response to Recommendation 6:** *South Texas College's Dual Enrollment Course Agreement (DECA) is the legal document which delineates academic and fiscal arrangements for the dual credit course. Current institutional procedures require that the signed Dual Enrollment Course Agreements must be returned to the College prior to the College's official census day. Although, the audit report did not site specific instances of non-compliance,*

*the Office of High School Programs and Services will implement controls to ensure the DECAs are executed and signatures are obtained prior to offering dual enrollment courses. The recommendation will be implemented in the Spring of 2011. The associate dean of high school programs and services will be responsible for strengthening controls and ensuring that DECA execution and signatures are obtained prior to offering dual credit courses.*

***Recommendation 7:*** *Develop and implement password policies and procedure that comply with the Department of Information Resources guidelines and are based on industry best practices.*

***Response to Recommendation 7:*** *South Texas College provides password protection to its student information system and supplies procedures for the creation and revocation of account privileges. Auditors recommended stronger controls to further reduce the risk of unauthorized access. South Texas College's Information Services and Planning division has since developed a college wide password standard and procedure that complies with Department of Information Resources guidelines and is based on industry best practice published from the National Institute of Standards and Technology (NIST). South Texas College's password standard addresses password expiry, password history, and password complexity as outlined by NIST. The vice president for information services and planning authorized implementation of the password standard, which is currently on a phased implementation schedule with college wide completion by December 31, 2010. Information Technology security personnel from the vice president for information services and planning's office will be responsible for ongoing compliance oversight of the password standard.*

*South Texas College's Office of Accountability will be responsible for reviewing progress and compliance of the recommendations and responses. The internal controls and compliance officer will ensure that processes are adequately reviewed and controls are strengthened and implemented to comply with dual credit standards, policies and procedures.*

#### **Management's Response from the La Joya Independent School District**

*La Joya I.S.D. agrees with the recommendations. The district will continue to work with South Texas College to strengthen control and to ensure that all proper documentation is in place. Gracie Lopez, Director for College Readiness will be responsible to review and implement the changes for the Dual Enrollment Program. These changes will be in effect spring 2011.*

***Recommendation:*** *Ensure that all students have all required approvals prior to enrolling them in dual credit courses. This documentation should include approval dates.*

***Response:***

1.) *In early spring, La Joya ISD will establish the following procedures for the Dual Enrollment Program.*

- *Conduct an orientation meeting with students and parents for those interested in the Dual Enrollment Program.*
- *All Dual Enrollment requirements and current policy items will be reviewed.*

2.) *All required documentation must be submitted to the counselors office by mid spring semester for enrollment approval. Also, to ensure that students meet all requirements prior to enrolling in a course. At the same time students are to complete an STC Form to qualify for enrollment as part of the registration requirement.*

3.) *La Joya ISD will review the current process to ensure that all required documented approvals are in place prior to student enrollment in a dual enrollment course. The documentation will include an approval date.*

4.) *The district will follow eligibility based on:*

- *TAC, Section 74.25, requires students to have the approval of the high school principal or other official designated by the school district to be eligible to enroll in dual credit courses. (Principal consent does not guarantee enrollment as the college will determine if the student meets the college's eligibility requirements and course prerequisites)*
- *TAC, Section 4.85, requires students to meet a college's regular prerequisites to enroll in a dual credit course.*

*Recommendation: Ensure that students meet all prerequisites prior to enrolling them in Dual Enrollment course.*

*Response:*

1.) *At our scheduled registration La Joya ISD counselors and administrator in charge of scheduling will verify that all students requesting Dual Credit classes meet the following:*

- *Verify TAKS individual results*
- *Verify THECB qualifying scores*
- *Ensure college application is on file with STC for entering students and verify that they meet college pre-requisites for those continuing with the program*

- *Work with the STC scheduling system which contains prerequisites scores that prevents a student from enrolling in the college class without meeting the minimum scores.*

#### **Management's Response from the McAllen Independent School District**

*McAllen Independent School District concurs with the recommendation. McAllen Independent School District will review the current procedures utilized to ensure that all students have required, documented approvals in place, prior to enrolling students in dual credit courses. Documented approvals shall include approval dates.*

**Districts and High Schools Tested**

As part of the audit of Texarkana College's (College) dual credit program, auditors tested the dual credit programs at New Boston High School in the New Boston Independent School District and Texas High School in the Texarkana Independent School District.

Texarkana College's (College) dual credit program fully or substantially complied with all requirements related to teacher qualifications and policies and procedures. However, the College should improve its documentation of student approvals to enroll in dual credit courses, its monitoring and evaluation of its dual credit program, and its contract agreements with the New Boston and Texarkana independent school districts (ISDs) for dual credit programs (see text box for information about the ISDs and high schools included in auditors' review).

**All dual credit students reviewed were eligible to take dual credit courses; however, the College did not ensure that the students were approved to take dual credit courses.**

All 100 students reviewed met the eligibility requirements for the dual credit courses for which they were registered. In addition, 46 (98 percent) of the 47 students met the prerequisites; the College waived the prerequisites for 1 student because of the student's high test scores in the subject area.

However, 57 (57 percent) of 100 of the dual credit approval forms processed by New Boston High School, Texas High School, and the College did not contain all of the required approval signatures or the dates of approval. Additionally, the high schools and College did not consistently document the approvals for students taking more than two dual credit courses in a semester. The College did not have documented policies or procedures outlining the types of approval and documentation related to student eligibility. Title 19, Texas Administrative Code, Section 74.25, requires the approval of the high school principal or other school official designated by the ISD for a student to be eligible to enroll in dual credit courses.

Title 19, Texas Administrative Code, Section 4.85, requires students to demonstrate outstanding academic performance if they wish to take more than 2 dual credit courses in a semester. Students may be approved by the principal of the high school and the chief academic officer of the college. Because approval forms were not signed or dated, auditors could not determine whether those students were approved to enroll in dual credit courses before the courses started.

**The College substantially complied with all requirements related to teacher qualifications.**

The College substantially complied with requirements to ensure that teachers were qualified to teach dual credit courses. Specifically, 13 (93 percent) of 14 teachers reviewed met the credentialing requirements of the College's accrediting entity, the Southern Association of Colleges and Schools (SACS). However, the College approved 1 teacher for dual credit courses before the

teacher had completed a master's degree and 18 hours of graduate study in the discipline the teacher taught. The teacher completed a master's degree and the last three hours of graduate study during the semester in which the teacher taught dual credit courses. The College ensured that all teachers were approved to teach before courses started.

Although the College ensured that dual credit courses offered met college level requirements, it did not monitor and evaluate teachers and dual credit courses to ensure academic rigor.

All of the dual credit courses offered by the College and the two ISDs reviewed were included in the *Lower Division Academic Course Guide Manual*, which is the official list of approved courses for general academic transfer that may be offered for state funding by public community and technical colleges in Texas.<sup>13</sup>

However, the College did not perform any monitoring or evaluation of the dual credit teachers and courses offered during the Fall 2008, Spring 2009, and Fall 2009 semesters. The College was restructuring its departments and, as of the end of the Fall 2009 semester, it had not yet developed or implemented an evaluation process. Title 19, Texas Administrative Code, Section 4.85, requires the higher education institutions to supervise and evaluate teachers of dual credit courses using the same or comparable procedures used for faculty at the main campus of the higher education institution.

Title 19, Texas Administrative Code, Section 74.25, requires higher education institutions that award credit to provide advanced academic instruction beyond, or in greater depth than, the essential knowledge and skills for the equivalent high school course. If the College does not adequately monitor and evaluate dual credit courses and teachers, it cannot ensure that the academic rigor of the dual credit courses is at the college level in compliance with state requirements.

Contract agreements between the College and the ISDs reviewed did not include all of the elements required by the Texas Administrative Code.

The contract agreements between the College and the New Boston and Texarkana ISDs did not include 3 of the 12 elements tested that are required by Title 19, Texas Administrative Code, Section 4.84 (see Appendix 2 for a complete list of the required elements). Specifically, the required elements missing from the contract agreements reviewed included:

- Faculty supervision process – The contract agreements did not address an evaluation process for the teachers of dual credit courses.

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<sup>13</sup> The *Lower Division Academic Course Guide Manual* is published and maintained by the Higher Education Coordinating Board.

- Courses grading – The contract agreements did not address how dual credit courses would be graded.
- Eligible courses –The contract agreements did not include some of the dual credit courses offered. Four dual credit courses offered at New Boston High School were not listed in the College’s contract agreement with New Boston ISD. Five courses offered at Texas High School were not listed in the College’s contract agreement with Texarkana ISD.

Additionally, the contract agreements were not signed by either party prior to the start of dual credit courses. Without ensuring that its contract agreements contain all of the required elements, the College faces an increased risk of misunderstandings with the ISDs regarding the dual credit program.

The ISDs fully complied with all requirements related to policies and procedures.

The New Boston and Texarkana ISDs’ policies and procedures related to offering dual credit courses included all of the elements required by the Texas Administrative Code and Texas Education Code.

## Recommendations

Texarkana College should:

- Develop formal written policies and procedures that require administrators to sign and date all dual credit approval forms. These forms should be completed before the student is allowed to enroll in a dual credit course.
- Ensure that all faculty approvals are properly completed and signed by the appropriate person according to its policies and procedures.
- Develop and implement an evaluation and review process to ensure that course content meets the appropriate academic standards and that dual credit students are receiving instruction at the college level.
- Ensure that its dual credit agreements with ISDs include all of the elements required by the Texas Administrative Code.
- Ensure that its dual credit agreements are signed by representatives of both parties prior to offering dual credit courses.
- Review its dual credit agreements with ISDs regularly to ensure that they are current and that all courses offered are included in the agreements.

The New Boston Independent School District should:

- Ensure that all approvals for students to take dual credit courses are documented with the signature of the appropriate high school official and dated.
- Ensure that all students who apply to take more than two dual credit courses have the required approvals documented.

The Texarkana Independent School District should:

- Ensure that all approvals for students to take dual credit courses are documented with the signature of the appropriate high school official and dated.
- Ensure that all students who apply to take more than two dual credit courses have the required approvals documented.

#### Management's Response from Texarkana College

- 1.) *Develop formal written policies and procedures that require administrators to sign and date all dual credit approval forms. These forms should be completed before the student is allowed to enroll in a dual credit course.*

*Texarkana College has changed the Dual Credit /Concurrent Enrollment Application and Procedure for all high school early admission students. Attached, please find the amended Dual Credit Application. Any student enrolling in more than two course offerings must have the additional approval of Texarkana College's Chief Academic Officer and the approval of the Principal of the High School. With written policy approval of the Texarkana College Administrative Council, this new Dual Credit Application and Policy will be added to all Dual Credit Agreements. Required dates of submission will be added to the Dual Credit Agreements and maintained through the Office of Admissions and our Assistant Registrar. In addition, the Admissions Office will assign the Assistant Registrar to audit each dual credit file for the appropriate signatures and dates of registration on a semester basis. This revision will be added to the all Dual Credit Agreements under the **Institutional Responsibilities Subsection**.*

- 2.) *Ensure that all faculty approvals are properly completed and signed by the appropriate person according to its policies and procedures.*

*With written policy approval by the Texarkana College Administrative Council and with cooperation with Texarkana College's Human Resource Office, written and dated approvals by the Vice-President of Learning, Associate Dean of Continuing Education, and the Director of Human Resources will document the qualifications and SACS accreditation of*

each Dual Credit Instructor. This procedure and review will be on a semester basis, and upon the addition of new or replacement instructors. This documentation will be maintained in the personnel file of each dual credit instructor and housed in the Texarkana College Human Resource Office. This element and subsection will be addressed and added to all Dual Credit Agreements between Texarkana College and Independent School Districts. **Faculty Approval and Supervision Subsection**

- 3.) Develop and implement and evaluation and review process to ensure that course content meets the appropriate academic standards and those dual credit students are receiving instruction at the college level.

With written policy approval of the Texarkana College Administrative Council, a written and on-site review by our Divisional Chairs and college full-time faculty mentors will ensure that course content, course syllabi, course textbooks, and appropriate instructional methods meet the academic standards of courses offered on our campus. Previously, faculty mentors in the areas of our Social Sciences Division and Humanities Division have been responsible for review in their academic area. Each dual credit instructor will be assigned a full-time faculty mentor for peer review. A formal written evaluation will be conducted by our full-time faculty or a Division Chairperson in all academic disciplines in cooperation and coordination of each school district. In addition, this element will be added as a subsection to all Dual Credit Agreements and will be conducted on a semester basis. The evaluation and review findings will be reported to the Vice-President of Learning and the Superintendent of each school district on a semester basis. The written documentation and findings will be maintained and housed in each instructor's personnel file in the Texarkana College Human Resource Office. All findings and written reviews for each instructor will be made available to the reviewed faculty member, the School District's Superintendent, and to each High School's Principal. This element as an **Instructional Content and Faculty Review Subsection** will be addressed and added to all Dual Credit Agreements between Texarkana College and Independent School Districts.

- 4.) Ensure that its dual credit agreements with school districts include all of the elements required by the Texas Administrative Code.

With written policy approval by the Texarkana College Administrative Council, an Instructional Content and Faculty Review Subsection and a Course Grading Subsection will be added to all Dual Credit Agreements. The elements outlined in response two and three will be added and referenced on each **Dual Credit Agreement under the Instructional Content and Faculty Review Subsection**. The **Course Grading Subsection** will emphasize the importance of documenting grading requirements on each course syllabus, what course requirements

*determine the letter grades for a Dual Credit Student (Example: A, B, C, D, F and W), the grade submission process, the required college approved textbooks, students' rights, and Texarkana College's Policy and Procedure for student withdrawal from class and/or from the College. Each semester, all course syllabi will be submitted to the Associate Dean of Continuing Education and archived in the folders of each Independent School District's Dual Credit Agreement. The course grading findings and distributions will be reported to the Vice-President of Learning and to each school district's Superintendent by the Texarkana College Registrar on a semester basis.*

- 5.) *Ensure that its dual credit agreements are signed by a representative of both parties prior to offering dual credit courses.*

*With written policy approval of the Texarkana College Administrative Council, a Dual Credit Agreement –**Course and Calendar for Approval Subsection** will be added to each Dual Credit Agreement. This subsection will define the first week in August of each new school year as the deadline for approval and signature by both parties. This signing and submission deadline date, being prior to the start of both the public school year and prior to the start of the college's fall semester, will alleviate any misunderstandings or ambiguity. In addition, this subsection will address the addition of new instructors and/or courses, any addendums to the agreements, and outline the district's responsibility to submit a school calendar, with holidays and in-service days denoted, to Texarkana College prior to the start of college courses. This document, course offerings, and calendar are to be reviewed on an annual basis by the school district's Director of Curriculum, the school district's primary Academic Counselor, the school district's High School Principal, and by Texarkana College's Associate Dean of Continuing Education. In addition, prior to the beginning of any registration period, the Office of Admissions and the Assistant Registrar will review all submissions of dual credit course offerings to be submitted to the Texas Higher Education Coordinating Board and report any discrepancies and/or omissions to the Associate Dean of Continuing Education and to the Vice- President of Learning. Written documentation of the review and approval of course offerings will be maintained by the Associate Dean of Continuing Education and submitted to the Vice-President of Learning on a semester basis. The Dual Credit Agreements will be signed by the President of Texarkana College and by the Superintendent of each school district. The Dual Credit Agreements will be filed, maintained, and archived by the Associate Dean of Continuing Education.*

- 6.) *Review its dual credit agreements with school districts regularly to ensure that they are current and all courses offered are included in the agreement.*

*With written policy approval by the Texarkana College Administrative Council, the elements outlined in **Response Number Five** will be added to each Dual Credit Agreement under the Calendar for Approval Subsection. This change in our Dual Credit Agreement will alleviate courses not being listed as approved course offering and provide both a semester and annual review for course offerings by the School Districts and Texarkana College.*

*The Administration of Texarkana College agrees with your audit findings and totally concurs with the audit recommendations. With written approval of the above amendments to our Dual Credit Agreements by the Texarkana College Administrative Council, the implementation of the outlined policies and procedures shall begin immediately. Texarkana College strives to be completely transparent, accurate, and compliant in offering both quality and affordable Dual Credit Course offerings to our Service Area High Schools.*

#### **Management's Response from the New Boston Independent School District**

*New Boston Independent School District agrees with the recommendation. The district has implemented procedures requiring the high school counselor to ensure that all approvals for students to take dual credit courses are documented with the signature of the appropriate high school official and dated, and that all students who apply to take more than two dual credit courses have the required approvals documented. Person responsible for implementing corrective action: High School Principal. Date of implementation: September 1, 2010.*

#### **Management's Response from the Texarkana Independent School District**

*The Texarkana Independent School District agrees with the recommendations and has taken the following measures to ensure appropriate signatures, dates and approvals are taking place for students who apply to Texarkana College.*

- *The district has taken steps to ensure all approvals for students to take dual credit courses are documented with the appropriate high school official signature and date. All students will have the appropriate high school official signature prior to enrolling in Texarkana College. The person responsible for implementing corrective action is the High School Principal. The date of implementation was August 2010.*
- *The district has taken steps ensure that all students who apply to take more than two dual credit courses have the appropriate approval. All students meeting the required guidelines for approval to enroll in more than two dual credit courses will be approved by the appropriate ISD school official and the appropriate Texarkana College official. The person*

*responsible for implementing corrective action is the High School Principal. The date of the implementation was August 2010.*

# Appendices

Appendix 1

## *Objective, Scope, and Methodology*

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### Objective

The audit objective was to determine whether selected independent school districts (ISDs) and higher education institutions have designed and implemented dual credit programs that meet the institutions' and ISDs' policies and procedures and state laws and rules regarding such matters as student eligibility, courses offered, and funding agreements.

### Scope

The audit scope included the Fall 2008, Spring 2009, and Fall 2009 semesters. The 12 community colleges selected for testing included:

- Alamo Community College District – St. Philip's College.
- Central Texas College.
- Clarendon College.
- Dallas County Community College District – Cedar Valley College.
- Dallas County Community College District – Richland College.
- El Paso Community College.
- Hill College.
- Kilgore College.
- Odessa College.
- Panola College.
- South Texas College.
- Texarkana College.

For each of the community colleges tested, auditors also reviewed the dual credit programs at two ISDs with which the community college had a contract agreement for dual credit courses. In addition, auditors tested one high school in each of the ISDs selected for testing. Auditors selected the community colleges, ISDs, and high schools by analyzing data provided by the Higher Education Coordinating Board and the Texas Education Agency.

## Methodology

The audit methodology included interviewing key personnel at each community college, ISD, and high school selected; reviewing policies and procedures for dual credit programs at each community college and ISD selected; testing documentation related to student eligibility and teacher qualifications; assessing course documentation and evaluations; and analyzing the student information systems used to enroll students in dual credit courses at the community colleges tested to determine data reliability.

As part of this audit, auditors developed a methodology for determining the community colleges' compliance levels with the requirements for dual credit programs. Those levels were:

- Fully Compliant – At least 95 percent of the items tested complied with the requirement, or the community college and/or ISD performed the requirements tested.
- Substantially Compliant - Between 70 percent and 94 percent of the items tested complied with the requirement.
- Needs Improvement - Less than 70 percent of the items tested complied with the requirement, or the community college and/or ISD did not perform the requirements tested.
- Not Applicable - Not applicable for the testing attribute.

Information collected and reviewed included the following:

- Contract agreements between the community colleges and ISDs selected.
- Policies and procedures related to the dual credit programs at each community college and ISD selected.
- Student-related information, including transcripts, test scores, and dual credit approval forms.
- Teacher-related information, including transcripts and dual credit approval forms.
- Dual credit course rosters.
- Dual credit course and teacher evaluations.
- Change management processes, user access account information, and password-related information for the student information systems used to enroll students in dual credit courses at each community college selected.

Procedures and tests conducted included the following:

#### Student Eligibility

- Sampled and tested dual credit students to determine whether they met all of the requirements to enroll in dual credit courses including whether:
  - ♦ Students were in the 11th or 12th grade or showed outstanding academic performance and were appropriately approved for exemption of this requirement.
  - ♦ Students took no more than six dual credit hours in one semester or showed outstanding academic performance and were appropriately approved for exemption of this requirement.
  - ♦ Students met minimum test scores and college course prerequisites to enroll in dual credit courses.
  - ♦ Student received proper approvals from the high schools before enrolling in dual credit courses.

#### Teacher Requirements

- Sampled and tested dual credit teachers to determine whether they met all of the requirements to teach dual credit courses and whether they were approved to teach before the dual credit courses started.

#### Monitoring and Evaluation

- Sampled and tested dual credit courses to determine whether they were college level courses.
- Reviewed community colleges' policies and procedures and tested evaluations available to determine whether dual credit teachers and courses were being sufficiently monitored and evaluated.

#### Contract Agreements

- Tested contract agreements between the community colleges and corresponding ISDs to determine whether:
  - ♦ They included elements required by Title 19, Texas Administrative Code, Section 4.84 (see Appendix 2 for more information).
  - ♦ They were signed by the community colleges and ISDs prior to the offering of dual credit courses.
  - ♦ The copies on file at the community colleges and corresponding ISDs were the same.

### Policies and Procedures

- Tested ISD policies and procedures related to dual credit to determine whether they complied with the Texas Administrative Code and Texas Education Code.

### Information System Controls

- Tested the controls over the community colleges' student information systems used to enroll students in dual credit courses to determine whether those systems' data was reliable for the purposes of this audit.

Criteria used included the following:

- Title 1, Texas Administrative Code, Chapter 202.
- Title 19, Texas Administrative Code, Sections 4.54, 4.57, 4.84, 4.85, 74.25.
- Title 2, Texas Education Code, Section 28.010.
- Southern Association of Colleges and Schools' *Principles of Accreditation*.
- Contract agreements and policies and procedures related to dual credit programs at the selected colleges and ISDs.

### Project Information

Audit fieldwork was conducted from March 2010 through June 2010. 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The following members of the State Auditor's staff performed the audit:

- Arby J. Gonzales, CFE (Project Manager)
- Lucien Hughes (Assistant Project Manager)
- Isaac A. Barajas
- Robert H. (Rob) Bollinger, CPA, CFE
- Cyndie Holmes, CISA
- Anna E. Howe

- Kamal Malik, CPA, MPA
- Brenda Zamarripa
- J. Scott Killingsworth, CIA, CGAP, CGFM (Quality Control Reviewer)
- Verma L. Elliott, CPA, CIA, CGAP, MBA (Audit Manager)

## Required Elements in Contract Agreements for Dual Credit Programs

Title 19, Texas Administrative Code, Section 4.84(b), lists specific elements that are required in contract agreements for dual credit programs. These elements are:

- Eligible courses.
- Student eligibility.
- Location of course.
- Student composition of course.
- Faculty selection, supervision, and evaluation.
- Course curriculum, instruction, and grading.
- Academic policies and student support services.
- Transcribing of credit.
- Funding.

Auditors reviewed the contract agreements between the community colleges and the ISDs selected using guidance from Title 19, Texas Administrative Code, Section 4.85, which lists details for the elements listed above. Auditors tested whether contract agreements included the following elements:

- A list of courses eligible for dual credit.
- A description of the eligibility requirements for students to take dual credit courses.
- The location(s) where the dual credit courses were to be held.
- The exceptions for student composition of the dual credit courses.
- A description of how teachers for the dual credit courses would be selected.
- A description of how teachers of dual credit courses would be supervised.
- A description of how teachers of dual credit courses would be evaluated.
- A statement that the course curriculum should be equivalent to courses offered in the main campus

- A statement that the course instruction should be equivalent to courses offered in the main campus
- A description of how dual credit courses would be graded.
- A list of the academic policies related to the dual credit program.
- A description of support services to be offered to dual credit students.

## ***Number of Dual Credit Students and Semester Credit Hours Awarded by Higher Education Institution Type***

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A total of 91,303 total dual credit students were enrolled during the Fall 2009 semester, according to the Higher Education Coordinating Board. As Table 4 shows, 91 percent of those students took dual credit courses offered by a community college.

Table 4

<b>Number of Dual Credit Students by Higher Education Institution Type Fall 2009 Semester</b>	
<b>Type of Higher Education Institution</b>	<b>Number of Dual Credit Students (Fall 2009)</b>
Community Colleges	82,757 (91%)
Texas State Technical Colleges and Lamar Universities (Technical Universities)	4,787 (5%)
Public Universities	3,759 (4%)
<b>Total</b>	<b>91,303 (100%)</b>

Source: Higher Education Coordinating Board.

Table 5 lists the number of dual credit hours awarded by each type of higher education institution.

Table 5

<b>Number of Dual Credit Hours Awarded by Higher Education Institution Type Fall 2009 Semester</b>	
<b>Type of Higher Education Institution</b>	<b>Number of Dual Credit Hours Awarded</b>
Community Colleges	403,889 (92%)
Texas State Technical Colleges and Lamar Universities (Technical Universities)	19,437 (4%)
Public Universities	17,469 (4%)
<b>Total</b>	<b>440,795 (100%)</b>

Source: Higher Education Coordinating Board.

## ***Number of Dual Credit Students and Dual Credit Hours Awarded at Selected Community Colleges***

The 12 community colleges selected for audit testing had 20,197 dual credit students enrolled during the Fall 2009 semester, which equates to about 22 percent of the total dual credit students enrolled during that semester, according to the Higher Education Coordinating Board. Table 6 lists the number of dual credit students and dual credit hours awarded at each community college selected for testing.

Table 6

<b>Number of Dual Credit Students and Credit Hours Awarded at Community Colleges Tested Fall 2009 Semester</b>		
<b>Community College</b>	<b>Number of Dual Credit Students</b>	<b>Number of Dual Credit Hours Awarded</b>
Alamo Community College District - St. Philip's College	1,844	7,047
Central Texas College	1,529	7,258
Clarendon College	355	2,003
Dallas County Community College District - Cedar Valley College	696	3,505
Dallas County Community College District - Richland College	1,175	11,092
El Paso Community College District	2,245	11,395
Hill College	991	5,126
Kilgore College	1,075	4,741
Odessa College	914	5,184
Panola College	365	1,771
South Texas College	8,075	46,628
Texarkana College	933	4,746
<b>Totals</b>	<b>20,197</b>	<b>110,496</b>

Source: Higher Education Coordinating Board.

Copies of this report have been distributed to the following:

### **Legislative Audit Committee**

The Honorable David Dewhurst, Lieutenant Governor, Joint Chair  
The Honorable Joe Straus III, Speaker of the House, Joint Chair  
The Honorable Steve Ogden, Senate Finance Committee  
The Honorable Thomas “Tommy” Williams, Member, Texas Senate  
The Honorable Jim Pitts, House Appropriations Committee  
The Honorable Rene Oliveira, House Ways and Means Committee

### **Office of the Governor**

The Honorable Rick Perry, Governor

### **Board Members, Chancellors, and Presidents of the Following Institutions of Higher Education Audited**

Alamo Community College District – St. Philip’s College  
Central Texas College  
Clarendon College  
Dallas County Community College District – Cedar Valley College  
Dallas County Community College District – Richland College  
El Paso Community College  
Hill College  
Kilgore College  
Odessa College  
Panola College  
South Texas College  
Texarkana College

**Board Members, Superintendents, and Principals of  
the Following Public School Districts and High Schools  
Audited**

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Center Independent School District  
Childress Independent School District  
Cleburne Independent School District  
Clint Independent School District  
Comal Independent School District  
DeSoto Independent School District  
Ector County Independent School District  
Florence Independent School District  
Grandview Independent School District  
Joaquin Independent School District  
Killeen Independent School District  
La Joya Independent School District  
Longview Independent School District  
McAllen Independent School District  
New Boston Independent School District  
Pampa Independent School District  
Richardson Independent School District  
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Engineering  
Sabine Independent School District  
Seguin Independent School District  
Seminole Independent School District  
Socorro Independent School District  
Texarkana Independent School District



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