Section VII

Responsibility 5: High School Equivalency Credentials

VII. High School Equivalency Credentials

"Establishment of criteria for individuals to obtain high school equivalency credentials, administration of appropriate exams and issuance of such credentials…" State Education Office Establishment Act of 2000, Section 6(b)(5).

A. Background

1. Introduction

The State Education Office Establishment Act of 2000 requires the SEO to conduct a study into the establishment of criteria, the administration of appropriate exams, and the issuance of high school equivalency credentials. The purpose of the study was to gather information required to make a recommendation as to whether responsibility for these functions should be transferred to the SEO. In order to meet the expectations of the Council of the District of Columbia and the SEO stakeholders in the Adult Education Community and to capture the intent of the law, it was necessary to conduct this study with the following considerations:

- Programs that issue high school equivalency credentials (HSEC) are generally for students over 18 years old and, therefore, belong in the category of adult education programs.

- Locally, the General Educational Development Program (GED) is the only "equivalency credential." However, within the District of Columbia and in some states, there are other programs for adult learners that issue a credential equivalent to a high school diploma obtained through a standard course of study.

- Each of the programs for adult learners has a different process and, therefore, the application of the law would be different for each of these credentialing processes.

Given these considerations, the SEO has framed this study to focus on high school equivalency credentials based on the following definitions:

- Establishment is defined as the approval of, and rule-making for, a program (i.e., criteria) that results in a credential for an adult learner.

- Administration of this program (i.e., appropriate exams) is defined as the routine organization of program participants and the routine monitoring of program providers to ensure that program standards are met and reported.

- Issuance is defined as the certification of adult learners who have successfully established criteria to obtain high school equivalency credentials.

These considerations ensure that the credentialing opportunities for adult students are accounted for and can be used to determine several feasible options for the location of all the functions related to HSEC. In order to make these distinctions clear, for the remainder of the document, HSEC will now be referred to as adult alternative secondary credentialing programs. This study will primarily concentrate on the three options currently operating in the District of Columbia – the GED, the External Diploma Program (EDP) and High School Completion Programs (HSCP).

2. Legislation

Before the enactment of the Adult Education Designation Emergency Amendment Act of 1998 (D.C. Act 12-449) and the Adult Education Temporary Amendment Act of 1998, (D.C. Act 12-454), DCPS was responsible for providing adult education services and programs, including adult alternative secondary credentialing programs. Under the District of Columbia Municipal Regulations, Section 2320, the Board of Education was responsible for the administration of the GED tests and approval of the issuance of the GED credential, based upon certification by the Superintendent of Schools that the applicants were qualified by virtue of having fulfilled all requirements for issuance of the credential.

In September 1998, the Council of the District of Columbia passed D.C. Act 12-449 and D.C. Act 12-454, which amended the District of Columbia Public Post-secondary Education Reorganization Act. These amendments designated the University of the District of Columbia as the agency responsible for supervision of the adult education program in public schools. Act 12-449 and Act 12-454 became D.C. Law 12-231, effective April 20, 1999.

Law 12-231 requires the Board of Trustees of the University of the District of Columbia to operate an adult education program that will serve three categories of adults, those who:

- lack sufficient mastery of basic educational skills to enable them to function effectively in society;

- do not have a certificate of graduation from a school providing secondary education and who have not achieved an equivalent level of education; or

- have limited ability in speaking, reading, writing, or understanding the English language and whose native language is a language other than English.

3. History

The Board of Education is an independent agency of the government of the District of Columbia that is vested with control of the public schools of the District (DCMR, June 1997, Title 5, Chapter 1, Section 100.6). Historically in the District of Columbia, the D.C. Board of Education has been responsible for the establishment of criteria and issuing the rules for adult alternative secondary credentialing programs. The GED is the most well-known credentialing program. The Board of Education delegated the routine operations of this responsibility to DCPS. An adult test taker with a passing score would receive a certificate.

The second credentialing program, the External Diploma Program (EDP), has existed in the District of Columbia since 1994. In this program, adults earn a high school diploma based on demonstrated competencies gathered from life and work experiences. The third credentialing alternative is the High School Completion Programs (HSCP), which include evening high school programs, and certain online high school programs. Through these programs, adult learners earn a high school diploma. The following are the separate histories of each program.

General Educational Development (GED)

The General Equivalency Development Credential has been under the supervision of the American Council on Education (ACE) since 1963. The American Council on Education requires that in each jurisdiction where the GED is established, the Chief State School Officer must select a GED Administrator (2000 GED Examiner's Manual for the Tests of General Educational Development - Sections 2-3).

The GED Examiner's Manual states that the GED Administrator is responsible for five areas – administration, supervision, outreach, staff development, and test security. The GED is a battery of tests designed to evaluate Writing Skills, Social Studies, Science, Art/Literature Interpretation, and Mathematics. These tests are designed to meet a national average of academic attainment by graduating high schools seniors.

In the District of Columbia, the administration of the GED was located within DCPS as one of its Adult Literacy Programs. While the administration of the GED program was located in DCPS, the Board of Education was responsible for issuing rules for both the Adult Literacy Program and the GED.

In September 1998, the City Council of the District of Columbia enacted legislation to transfer all responsibility for adult education and literacy programs from DCPS to the University of the District of Columbia (UDC). This transfer determined that DCPS would be the state education agency for kindergarten through 12th grade, and designated UDC as the state education agency for adult education, as well as the state education agency for public post-secondary services. The transfer was completed on January 4, 1999, when the Board of Trustees of UDC assumed full authority and became the State Education Agency for Adult Education (SEA-Adult Education).

External Diploma Program (EDP)

Approved in 1979 by the U.S. Department of Education and nationally distributed by the American Council on Education, the External Diploma Program is a credentialing program for adult learners who can demonstrate having obtained academic skills from life experiences. However, unlike the GED, which is a traditional examination, the External Diploma Program is a series of independent study assignments given to the applicant to complete in roughly a year. Students demonstrate their learning through the development of a portfolio, completion of task booklets, and individual assessment interviews conducted by

trained assessors. At the end of the program the student is awarded with a high school diploma.

Nationally, the External Diploma Program was originally designed and distributed by the American Council on Education. In March 2000, the American Council on Education transferred ownership of the National External Diploma Program to the Madison Area Technical College in Wisconsin, which now administers the program.

In October 1994, DCPS paid for 15 people to be trained by ACE to administer the EDP program. While DCPS established the program, it did not provide subsequent funds to develop and maintain the EDP. In 1997 a group entitled the DC External Diploma Program Partnership, composed of the DCPS-Ballou STAY principal and eight non-profit providers, began to plan how the EDP could be re-established in the District. In December 1998, DCPS provided additional funds to train 15 new assessors, and in January 1999, the program started enrolling participants. Most of the trained assessors work at locations connected to the D.C. External Diploma Program Partnership.

High School Completion Programs

High School Completion Programs provide the opportunity for adult students to receive a high school diploma by taking high school courses. In some high school completion programs, adult students must complete the same course requirements as teenage students, such as physical education, in order to graduate. In other programs, the students complete an accelerated course of study filling vacancies or completing a number of core courses. Within the District of Columbia, the Board of Education has established night high school programs.

Within DCPS, the night schools were included with the Adult Education Programs until the early 1990s, when these programs were shifted to the office of the Assistant Superintendent for Senior High Schools. The night schools continued to be funded by the same weighted student formula as the K-12 schools. (There is no additional funding provided for those students who share enrollment in both day schools and night schools.) There are currently three night high school programs – Spingarn STAY, Ballou STAY, and the 21st Century Community Learning Centers. Each of these programs has been designed for the communities they serve.

The three schools offering night high school programs have offered academic and vocational programs in the District of Columbia for the past 36 years. Spingarn STAY, founded in 1965, accepts students who have finished the 8th grade and are under 21 years of age, and, therefore, includes both minors and young adult students.

Ballou STAY has been in operation for the past 15 years. It started out as a small drop-out prevention program, with four or five teachers. The program was housed at the Far Southeast Development Center, with only vocational offerings (the only academic class offered was Physical Education) for students 18 years old and above. It remained a small program (i.e., 160 student enrollment) until approximately five years ago. The age range of the student population has been modified to include students between the ages of 14 and 60.

Ballou STAY moved to its current location in Ballou Senior High School 11 years ago. In the past six years, 409 adults have graduated from there; however, hundreds more have been assisted in graduating from other high schools due to the courses they were able to complete at Ballou STAY.

The 21st Century Community Learning Centers (CCLC) program was established in 1999 by DCPS under a grant from the United States Department of Education. This program targets communities where low test scores, high school drop-out rates, and poverty are dominant factors (*Youth Investment Program – A Proposal Submitted to the Office of Educational Research and Improvement, United States Department of Education for Twenty-First Century Community Learning Centers in the District of Columbia CFDA #84.287;* Submitted by DCPS, 03/01/99, page 1)**.** The courses, which are designed for adults, are held from 4:30 p.m. until 7:30 p.m. Unlike Ballou STAY and Spingarn STAY programs, which are based on Carnegie units, the 21st Century Community Learning Centers courses are offered by the University of the District of Columbia.

4. Current Status

Currently in the District of Columbia, an adult student wishing to obtain a high school completion credential has three options: the GED, the External Diploma Program, and Night High Schools. Following is a description of each of these programs.

General Educational Development (GED)

Since 1998, the University of the District of Columbia has been responsible for the SEA-Adult Education, which houses a division for the GED State Office. The SEA-Adult Education grants local and federal dollars to local adult education program providers. Federal law requires the SEA-Adult Education to monitor these funds, certify that requirements are being met, and provide accurate reporting.

The United States Department of Education approved the SEA-Adult Education State Plan for Adult Education, which began in 2000. In the D.C. Adult Education Approved State Plan dated June 2000, the following seven populations were identified as being the most in need of literary skills enhancement, additional academic training, work place development skills, vocational skills, and life skills development:

- educationally disadvantaged;
- individuals with disabilities;
- single parents;
- individuals with limited English proficiency;
- institutionalized individuals;

- homeless adults; and
- senior adults.

Many members of the identified populations turn to the GED to meet their personal and/or professional goals for literacy. The SEA-Adult Education administers the GED examination and provides GED transcripts and certificates. In January 2002, ACE will release a new version of the GED, which the ACE website indicates will capture recent developments in education.

SEA-Adult Education Outstanding Financial Issue

One fiscal consideration has to do with the recent allegations concerning UDC officials diverting money ($2.5 million) that was earmarked for literacy programs, or alternatively, that the promised funding was never received from the City Council. Ideally, an SEO could maximize and better monitor the District's receipt and use of Federal and local funds.

External Diploma Program

Currently, the External Diploma Program is active in the District of Columbia. Adult students, 30 years of age or older, may enroll in the External Diploma Program to earn a high school diploma. Diplomas are issued from the Ballou STAY High School and are signed by its Principal, the Superintendent, and the President of the Board of Education. There are a number of adult literacy providers in the District of Columbia, including Ballou STAY, that assess External Diploma Program candidates.

The National External Diploma Program has plans to expand the program with the addition of an electronic version currently being developed by American Council on Education under a $1 million U.S. Department of Education contract. This electronic version will allow individuals to complete the assessment process on-line. Testing of the electronic version recently began at some pilot sites, including the D.C. Public Library Literacy Resources Division in Southwest D.C.

Forty-six External Diploma Program diplomas have been issued in the District of Columbia (from Ballou STAY High School, the Academy of Hope and Notre Dame Adult Education Center, the original three sites) since 1999, the year the program began enrolling participants. There are several other sites that are trained to do External Diploma Program assessments; however, none have produced any graduates as of this date. These numbers continue to increase, and it is anticipated that additional EDP students will graduate in July and August 2001.

High School Completion Programs (HSCP)

The three aforementioned HSCPs – Ballou STAY, Spingarn STAY, and the 21st Century Community Learning Centers -- are all currently operating within DCPS. Spingarn STAY

currently has 305 students enrolled. Of these students 80 attend the night high school. The other 225 students are mostly juniors and seniors who attend classes during the day while working towards graduation.

Ballou STAY currently has 360 students enrolled, not including the 100 additional students who come there to complete classes they failed at another high school but need in order to graduate. Ballou STAY's programs have become so popular in meeting the needs of so many D.C. citizens that it has expanded its hours of operation beyond the traditional evening hours by offering day classes. In addition to enabling students to complete their high school diploma, the program prepares them to go to college, to own and operate their own small businesses, to go to a vocational or technical program, or to work upon completing their high school education.

The 21st CCLC has established 10 sites: Eliot Junior High School, Francis Junior High School, Garnett-Patterson Middle School, Patricia Roberts Harris Education Center, Hart Middle School, Kramer Middle School, MacFarland Junior High School, Shaw Junior High School, Sousa Middle School, and Terrell Junior High School. Approximately 350 adults have been served from this program (Source for both figures: *21st Century Community Learning Centers Annual Report for Fiscal Year 2001*, April 2001).

B. Description of Practices in Other States

This section provides a description of how the function is managed in other states, with the goal of identifying practices that may be most suitable for the District of Columbia. Questionnaires and interviews were used to elicit information from state, county, and local officials. Only in those cases where this information was relevant to the study was it included.

Maryland and Virginia were chosen because some of their current adult education staff have been involved in the development of the District of Columbia's adult education programs. In addition, the close proximity of these two states to the District of Columbia requires attention to examine whether there is continuity between the services offered to adult candidates among the three regions. Determining whether the credentialing process is consistent or not could highlight obstacles. These obstacles and their solutions may influence the location and operations of this responsibility. Hawaii was chosen because, as with the District of Columbia, there is one single school district. By comparing D.C. and Hawaii to Maryland and Virginia, key distinctions regarding the location of the responsibility can be made.

It is important to note that the Adult Education and Family Literacy Act requires the designation of a state-level agency to receive federal funds. A state agency is considered to be the most appropriate for establishing a statewide program and coordinating with other state and national entities.

Maryland

The Maryland State Department of Education (MSDE) is the state agency responsible for rule-making, monitoring, and certification of adult education programs. As the State Education Agency for Maryland, the MSDE receives Federal and state funds to award to LEA adult education and community colleges. These awards are made through an RFP (Request for Proposal) process. These grants provide for ABE, Pre-GED and EDP. In some cases, the participant pays for a portion of the program. During the 1960s, the Federal government required a state structure to ensure accountability for the money provided for adult education services. This is the basis for the existing financial structure.

By statute, only the MSDE may award the Maryland High School Diploma. Consequently, there is one Maryland High School Diploma, but there are three ways it can be earned: passage of the GED, completion of the EDP, or completion of a high school course of study, which includes the night high school. The value of the credential is the same, regardless of the route an individual chooses. The significant difference is who issues the diploma. The MSDE issues the Maryland High School Diploma for GED and EDP completion. The Maryland High School Diploma earned as a result of night high school completion program (HSCP) is issued by the local school system attended.

Within the MSDE, the Division of Career, Technology, and Adult Learning is responsible for the daily operations involved in GED test registration, administration, scoring, and diploma issuance. There are GED sites throughout the state that are operated by this division, which is also responsible for oversight of the GED instructional program through funds granted to local schools, community colleges, and community-based organizations providing the instructional programs. For the EDP program, MSDE provides the oversight, ensures national standards are met, issues diplomas, and awards funding for local grantees to conduct assessment.

On the county and local level, the GED and the EDP are located in different places. The Baltimore County office and Baltimore City office are considered separate local education agencies, even though they serve the same population. Until a couple of years ago, all adult education services came out of an LEA department that coordinated services for adults. The Baltimore County-LEA for adult education is located at a community college. It sponsors most of the services to adults such as ABE, Pre-GED and EDP. The Baltimore City–LEA for adult education operates the EDP from within the school system.

Local school systems are responsible for monitoring the night HSCP. Evening high school is part of the school system in both the city and county. At the local level, the same person who administers the GED instructional program is the one who administers the majority of the evening high school programs.

Virginia

The General Assembly of the Commonwealth of Virginia has given statutory authority to the Virginia State Board of Education "to require the development of adult education programs in every school division." The Governor appoints the Board and the Superintendent, with

the Superintendent serving as a non-voting member of the Board and the head of the Virginia Department of Education. The Commonwealth of Virginia offers GED certificates at the state level and diplomas for the EDP and the HSCP at the local level.

Under the direction of the Board, the Superintendent and staff are charged with the following operations related to local programs: administering and distributing funds, providing technical assistance, and monitoring operations and compliance (e.g., GED testing centers). The adult education funds are provided through Federal, state, local, and private resources. The State Board of Education has set a fee of $35.00 for all GED test takers. Local programs may also charge fees for adult education services (the amount varies by school division). For example, the Fairfax County Public Schools System charges tuition for the EDP based on the student's income. (Annual income of $35,000 or less, tuition is $300; annual income greater than $35,000, tuition is $600.) These arrangements allow for some local programs to be better funded than others. In order to compensate for this fact, some rural programs may pool their state and local financial resources in regional efforts to accommodate all adults seeking adult education and literacy.

Within the Virginia Department of Education, the Office of Adult Education and Literacy is responsible for overall administration of adult education programs. This office provides technical assistance for all adult education programs, which includes interpretations of rules and regulations for adult education made by the Virginia State Board of Education. The Office of Adult Education and Literacy maintains annual records of the number of certificates and diplomas issued, even though it is only responsible for issuing the GED certificate.

The monitoring of GED programs and issuance of the GED credential is a state-level function. Within the Office of Adult Education and Literacy, the GED administrator monitors the GED testing centers to ensure they are in compliance with the rules and regulations of both the state and the American Council on Education (ACE). The Virginia Board of Education has ruled that students who score at least 225 on the entire battery of tests with no single test score lower than 40 should receive the GED credential. The Office of Adult Education and Literacy issues the GED credential, which is not a diploma but a high school equivalency certificate, while the LEAs are responsible for issuing all diplomas for the day schools, night schools, and the EDP.

In accordance with Virginia regulations, local school divisions are responsible for day-to-day operations, including instruction, registration, test administration, and issuance of standard or advanced studies diplomas.

Within the Fairfax County Public School System, it is the Fairfax Board of Education that approves and funds local programs. Local funds for adult education are sent to the Office of Adult and Community Education, which is responsible for adult education services and monitors GED instruction, GED testing, the EDP, and the HSCP. The staff administering GED functions organizes local concerns under the guidance of the SEA-GED office.

With the exception of an agreement letter between the Virginia Department of Education and the National External Diploma Program, the EDP is nearly exclusively organized and funded locally through the public school system. The local office is responsible for establishing the program, creating a relationship with a local high school, training and monitoring local assessors, maintaining records, managing funds, and issuing diplomas. Without state oversight and funding, the local office relies primarily on relationships in order to maintain the EDP program.

Adults who want to earn a high school completion credential (standard or advanced studies diploma) must either complete the EDP or meet the requirements for high school graduation in place at the time they would have completed ninth grade. The Office of Adult and Community Education also oversee these night schools. The entire organizational structure allows for the Fairfax County Public School system to serve a large population of adult students.

It is important to note that the Virginia Department of Education works closely with the Department of Social Services and the Department of Rehabilitative Services on certain projects. Local school divisions work closely with other state and local agencies, community-based literacy organizations, and private businesses. The number of partners and intensity of collaboration vary by school division.

Hawaii

The Hawaii State Board of Education, which is elected, acts as the supervisory authority over Hawaii's Department of Education. The State Board of Education issues policies, which it monitors through committee hearings, and appoints the Superintendent, who is the Chief State School Officer and the head of the State Department of Education. The Department is both the SEA and LEA and serves seven Hawaiian islands.

The State Department of Education is divided into five divisions, each of which is subdivided into branches, which, in turn, are composed of sections that address specific education areas. These different sections administer academic programs in the seven sub-school districts that service all of the Hawaiian islands. Through this system, the Hawaii State Department of Education provides the GED, a Competency Based High School Diploma Program (CB) developed by the Hawaiian education administration, and night high schools.

The School Improvement Leadership Branch, located in the School Support Division of the Hawaii State Department of Education, is comprised of five sections, of which two are responsible for Federal categorical programs and adult education. In addition to Federal funds, this division receives state funds to support these programs; consequently, there is no charge for high school and adult basic education programs.

The Community and Adult Education Section is the section within the School Improvement Leadership Branch responsible for adult education. It provides academic development, compiles statistical analysis and monitors the Adult Community Schools, which are

responsible for delivering the adult education services directly to the population. Within these schools are the GED testing sites, the CB programs, and the night high school classes.

The adult community high schools are structured similarly; however, they are individually designed to meet the needs of their communities. Each school is divided into three classes of academic services: ABE courses for grades 1 through 8, High School courses for grades 9 through 12, and special interest courses, such as golf and cooking. There are four education specialists who are responsible for the academic services classes: a specialist for ABE course development, a specialist for ABE budget and policies, a specialist for adult secondary education, and a specialist for family literacy. Each specialist reports to the Director of the School Improvement Leadership Branch, who is also the state GED administrator. The education specialist for adult secondary education is responsible for all adult diploma programs, including the CB and the HSCP.

In Hawaii, the GED credentials more students than any other alternative. The Director of the School Improvement Leadership Branch monitors the testing centers located in the Adult Community Schools. He certifies that the sites are complying with ACE and state GED regulations. Students who pass the GED receive a certificate, unless they are a resident of Hawaii and have completed at least one semester of schooling in Hawaii, in which case they can request to have a diploma signed by the Board. All other matters relating to the issuance of diplomas are the responsibility of the education specialist for adult secondary education.

Both the CB and the HSCP are provided academic support and are monitored by the adult secondary education specialist. The CB credentials the second highest number of adult students. It has become such a viable option that non-adult high school students are taking the CB. It was designed in the 1970s by the Hawaii Department of Education, based on a competency-based program in Texas, adapted to be culturally relevant to the Hawaiian population, and approved by the Hawaii State Board of Education.

The CB is similar to the EDP sponsored by the National External Diploma program in that it gives credence to academic information gained from life experiences. It differs, however, in structure and content organization. The CB has two phases: CB classes and Career Goals. The CB classes cover five skills units, which are evaluated through testing: Community Resources, Government and Law, Health, Occupational Knowledge, and Consumer Economics. Each student must receive a 70% or better on each unit test in order to move to Phase Two. To complete this phase students have to meet the following career goals: be accepted in post-secondary educational training, be employed, have marketable skills, or have home or life management skills. When these two phases are completed, the student receives a high school diploma.

The final alternative is the HSCP, which had only one graduate last year. HSCP students must obtain 22 credit hours, the standard number of credit hours for a high school senior to graduate. Students can meet this requirement by taking the courses they hadn't taken at the time they dropped out. After 22 credit hours are obtained, the student receives a diploma.

The Community and Adult Education Section, through partnerships with prisons, labor unions, welfare organizations, community colleges, universities, and businesses, is able to provide a network of government agencies to support the state's adult literacy goals. This process has been encouraged through the Work Force Investment Act.

C. Statement of Options

The following options have been developed based on the information gathered during this study. A discussion of each option and the advantages and disadvantages of each are presented. Regarding adult education in general, a disclaimer is necessary: The SEO Establishment Act charged the SEO with conducting a study on the establishment, administration, and issuance of high school equivalency credentials. Any evaluations regarding the general location and operation of adult education offices, as valid and well-founded as they may be, have been made with respect to the credentialing programs. Therefore, the SEO's proposed options are based first on what a credentialing program needs from an adult education office and, second, on what adult students and adult education program providers need from a credentialing program within an adult education office.

Option One: The establishment, administration and issuance of adult alternative secondary credentials would remain with the Board of Education, DCPS, UDC's Board of Trustees, and the SEA-Adult Education.

Discussion: Under this proposal the Board would continue to retain its authority to approve all new programs that led to a high school diploma and any credential deemed as equivalent. It would also have responsibility for rule-making for any new program, the EDP, and the night high schools. DCPS, as the Board's designee, would continue to be responsible for administration, issuance, and all related functions of the EDP, night high schools, and any new program. (It is important to note that currently the monitoring, reporting, and record keeping of the EDP is not formally incorporated into the structure of DCPS.)

As is stated in D.C. Act 12-449 and D.C. Act 12-454, the Board of Trustees of the University of the District of Columbia would retain the responsibility for rule-making regarding the GED. The SEA-Adult Education, as the Board of Trustees' designee, would remain responsible for administration, issuance and all related functions to the GED. It would also continue to be responsible for all of its current responsibilities regarding adult education.

Advantages:

- The Board of Education would continue to set local standards of performance required to qualify for a credential.

- The SEA-Adult Education would be given the opportunity to continue to implement its four-year state plan.

- UDC would be given the opportunity to continue to demonstrate its capacity to carry out its adult education responsibilities.

- The SEA-Adult Education could build on its track record of providing support for multiple adult literacy agencies. (Stakeholders have indicated that the SEA-Adult Education has proven its dedication to the mission of adult education and should remain the governing agency for adult literacy in the District of Columbia. This is of particular concern given that fact that the adult education community is in a rebuilding process from financial cutbacks.)

- The SEA-Adult Education has fostered a network of adult literacy program providers and has supported unity within segments of the adult literacy community.

- The adult education functions would remain in the setting of an academic institution.

- The Ballou STAY and Spingarn STAY programs have been successful with night high school credentialing and vocational education.

- The Ballou STAY principal is one of the founders of the EDP in the District and is familiar with the needs of the school system and the EDP.

- As a state agency, the SEA-Adult Education is designated to receive federal funds.

Disadvantages:

- DCPS would need to create at least a small adult education office to monitor the private and public EDP program providers, even though it would not directly receive federal funds and this would cause duplication of offices within the District.

- The UDC Board of Trustees, designated as the SEA for Adult Education, would continue to have a conflict of interest for it would continue to both fund and compete for grants to provide adult education programs.

- The SEA-Adult Education, located within UDC, would continue to operate similarly to an LEA adult education office similar to that in Baltimore County, Maryland. Consequently, there would be no true state-level authority.

- The SEA-Adult Education, located within UDC, might not have the authority to organize the District governmental agencies and private concerns necessary to provide support to adult learners and program providers.

- This option would continue to promote a decentralized structure for adult education in the city.

Option Two: The SEO would receive full responsibility for the establishment, administration, and issuance of all credentialing programs and all related authorities.

Discussion: Under this option, the SEO would be organized similar to a traditional state department of education, with an office of adult education. The SEO would have the responsibility to approve new credentialing programs, make rules regarding all credentialing programs, monitor program providers, and report statistical information. It would also be responsible for operations of GED testing and certification. In addition, it would monitor to make certain that the EDP providers and the night schools were, respectively, meeting the standards set by the NEDP and the District of Columbia.

For this to occur, the SEO would assume the functions of the SEA-Adult Education, which is currently located at UDC, and would assume responsibility for approving all new and current adult education programs that lead to a high school diploma and any credential deemed as equivalent. This would also require that the SEO create an academic support unit for the night high schools and set standards of performance required to qualify to receive credentials.

Monitoring and administering night high school programs would require the SEO to have authority over high schools in general.

In addition, legislation would have to be enacted to designate the SEO as the recipient of Federal and local funding associated with adult education programs.

The SEO would fill a particular oversight/governance void in certain areas, such as ensuring that the core missions of the various organizations involved in adult education are met, thereby exercising state power that would eclipse the authority of the various entities to police themselves. The SEO would serve as the authority for all rules governing education, and could provide comprehensive administration of policies that are currently spread across more than one area (such as issuance of credentials).

Advantages**:**

- The SEO's mission as a higher level state agency is broader and could incorporate the SEA, providing a more objective oversight vehicle for local providers and District agencies.

- This would allow adult education to be viewed as a higher priority, as other states have recommended is advisable for the maintenance of effective programs.

- This would allow for a comprehensive treatment of adult education policies, and would concentrate functions that are currently spread across multiple bureaucracies.

- It would eliminate self-oversight by DCPS and UDC of their respective adult education programs, which are currently experiencing conflicts of interest.

- Separating the GED administration and examination functions would hinder the SEA's ability to offer complete adult education services. If the SEO were to monitor the GED administration, as is done in other states, it would limit the SEA's ability to function efficiently. For this reason, a successful transition can take place only if all of the related functions are transferred to the SEO.

- A transfer of the administration and monitoring of the adult education functions from DCPS and the SEA to the SEO would remove the conflict of interest that exists because DCPS and the SEA currently oversee their own adult education functions (i.e., in terms of separation of state and local functions).

- Positioned in this role, SEO would provide more objective oversight as a neutral entity rather than an advocate of any particular stance, thereby eliminating sources of conflict of interest.

- SEO could maximize and better monitor the District's receipt and use of Federal and local funds (i.e., regarding the recent allegations concerning UDC officials diverting money that was earmarked for literacy programs, or alternatively, that the promised funding was never received from the City Council).

Disadvantages:

- Transfer timing could create instability by damaging current partnerships and halting or disrupting successful reform efforts, thereby resulting in a disruption of services.

- Implementation of this option might incur start-up and additional operating costs.

Option Three: The Board of Education, DCPS, and the SEO would each be responsible for some of functions related to the credentialing programs. The SEA-Adult Education Office would be transferred from UDC to the SEO.

Discussion: In this proposal, the Board of Education would continue to approve all new credentialing programs. The SEO would be responsible for routine rule-making, any mandated operations, monitoring, reporting, record keeping, and certification procedures related to the GED, EDP, and any new program developed. The night high schools would remain in DCPS; however, the SEO would work with DCPS to coordinate a plan for adult education services in the city. This option would require that the SEA-Adult Education be transferred from UDC to the SEO. It would also require DCPS to report information to the SEO.

Legislation would have to be enacted to designate the SEO as the recipient of Federal and local funding associated with adult education programs.

Advantages:

- By establishing the credentialing program, the Board of Education would continue to set local standards of performance required to qualify for a credential. The SEA-Adult Education would, therefore, be able to meet local and national standards of education.

- Ballou STAY, Spingarn STAY and the 21st CCLC, as course-based alternatives, would continue to benefit from being located at the LEA level and in the school system. However, they would also receive the special attention needed as unique high schools for adult education.

- As of October 1, 2001, the D.C. Tuition Assistance Grant Program and the Office of Post-Secondary Education and Research Assistance will be transferred to the SEO. In conjunction with the SEA-Adult Education Office, these SEO divisions can better coordinate actions to improve higher education attainment in the District.

- The SEA would have a higher profile and be able to provide more support to adult education providers.

- Adult Education governmental services could be centralized in the SEO, reducing multiple funding and reporting streams.

- This would allow for a comprehensive treatment of adult education policies, and would concentrate functions that are currently spread across multiple bureaucracies.

- The SEA-Adult Education located in the SEO would eliminate the need for a DCPS adult education office, which would eliminate conflicts of interest that may have existed in DCPS or currently within UDC.

- Separating the GED administration and examination functions would hinder the SEA's ability to offer complete adult education services. If the SEO were to monitor the GED administration, as is done in other states, it would limit the SEA's ability to function efficiently. Therefore, a successful transition could take place only if all of the related functions were transferred to the SEO.

- A transfer of the administration and monitoring of the adult education functions from DCPS and the SEA to the SEO would remove the conflict of interest that exists because DCPS and the SEA currently oversee their own adult education functions (i.e., in terms of separation of state and local functions).

- Positioned in this role, the SEO would provide more objective oversight as a neutral entity rather than an advocate of any particular stance, thereby eliminating sources of conflict of interest.

- SEO could maximize and better monitor the District's receipt and use of Federal and local funds (i.e., regarding the recent allegations concerning UDC officials diverting

money that was earmarked for literacy programs, or alternatively, that the promised funding was never received from the City Council).

Disadvantages:

- Stakeholders may view this option as insensitive to positions they have repeatedly articulated regarding the SEA-Adult Education's proven dedication to the mission of adult education and that the SEA-Adult Education should remain the governing agency for adult literacy in the District of Columbia.

- This may be seen as having a negative effect on the status and image of the only public higher education institution in the city.

- Transfer timing could create instability by damaging current partnerships and halting or disrupting successful reform efforts and could, therefore, result in disruption of services.

Option Four: The SEO would only be responsible for monitoring the EDP. All other functions would remain in their current location.

Discussion: Under this option, the Board of Education would charge the SEO with the responsibility of monitoring the EDP program. The SEO would have to create a small EDP monitoring and development office. If the SEO were to assume the monitoring and development function for the EDP, then this currently unfulfilled function would be satisfied; however, for the SEO to have any authority to be able to enforce its monitoring process, it would have to assume or share some of the authorities that currently reside in DCPS and the Board of Education. The night high schools would continue to be located in DCPS. The GED would continue to be located within UDC.

Advantages:

- This option would result in the establishment of a formal, state-level monitoring, reporting, and record-keeping authority for the EDP program in the District of Columbia.

- The Board of Education would continue to set local standards of performance required to qualify for a credential.

- The SEA-Adult Education would be given the opportunity to continue to implement its four-year state plan.

- UDC would be given the opportunity to continue to demonstrate its capacity to carry out its adult education responsibilities.

- The SEA-Adult Education could build on its track record of providing support for multiple adult literacy agencies and being a relentless advocate for pursuing funding for adult literacy. (Stakeholders have indicated the SEA-Adult Education has proven its

dedication to the mission of adult education and should remain the governing agency for adult literacy in the District of Columbia. This is of particular concern, given that fact that the adult education community is in a rebuilding process from financial cutbacks.)

- The SEA- Adult Education has created a network of adult literacy program providers and has fostered unity within segments of the adult literacy community.

- The adult education functions would remain in the setting of an academic institution.

- The Ballou STAY and Spingarn STAY programs have been successful with night high school credentialing and vocational education.

- The Ballou STAY principal is one of the founders of the EDP in the District and is familiar with the needs of the school system and the EDP.

- As a state agency, the SEA-Adult Education is designated to receive federal funds.

Disadvantages:

- DCPS would to need create at least a small adult education office to monitor the private and public EDP program providers, even though it would not directly receive Federal funds and this would cause duplication of offices within the District.

- The UDC Board of Trustees, designated as the SEA-Adult Education, would continue to have a conflict of interest for it would continue to both fund and compete for grants to provide adult education programs.

- The SEA-Adult Education, located within UDC, would continue to operate similarly to an LEA adult education office similar to that in Baltimore County. Consequently, there would be no state-level authority in place to monitor the functions of this agency.

- The SEA-Adult Education, located within UDC, might not have the authority to organize the District governmental agencies and private concerns necessary to provide support to adult learners and program providers.

- This option would continue to promote a decentralized structure for adult education in the city.

D. SEO Recommendation and Rationale

Recommendation

The SEO is recommending Option One, whereby all functions related to high school equivalency credentials would remain with the current agencies or entities.

Rationale

Based on interviews and the stakeholders meeting, it is the belief of the SEO that adult students should be developed holistically. Most adult education providers seek to develop the student from ABE through professional competency. In general, most credentialing programs, such as the General Educational Development Program (GED) and the External Diploma Program (EDP), are created not to be an end point, but a step towards full literacy; these programs must be interconnected to other adult education services, such as the ABE courses, ESL classes, and work force literacy training. Consequently, it is not the SEO's recommendation that any one adult credentialing process should be removed without the appropriate support services and related adult education programs.

While Option Three appears to be the best option for the SEA-Adult Education, the program providers, and the adult students, the SEO was not charged with the responsibility of studying adult education in general, but specifically the establishment, administration, and issuance of high school equivalency credentials. Therefore the view of a well-functioning adult education office provided in this study may be slightly skewed by the emphasis on the credentialing function. Consequently, the SEO can only recommend Option One.

Under this option, the SEO would not assume any responsibility for any adult education functions. There are currently numerous government agencies and funding streams relating to adult education. It is not the intent of the SEO nor is it in the spirit of the SEO Establishment Act to create conflicts of interests or duplication of services, which would occur if the SEO took only one part of adult education. The newly constituted Board of Education and the UDC Board of Trustees should continue to manage their current processes and to perform their current duties.

Furthermore, it is the opinion of the adult education community that the current SEA has demonstrated its ability to address adult education needs and administer Federal requirements for funding program providers. (The SEA has recently received approval of its four-year state plan by the U.S. Department of Education.) In addition, the EDP program has been developed and supported by non-government organizations. These three factors signify that the adult education community is beginning to become stable.

Transfer of the adult education functions to the SEO from DCPS and UDC potentially could have the effect of halting successful reform efforts that are currently underway. Further, untimely reorganization might result in a disruption of funds and dissolution of existing adult educational partnerships — dynamics critical to the continued smooth success of adult education in the District of Columbia.

E. Application of Decision Criteria

This section contains the State Education Office's assessment of the degree to which SEO assumption of responsibility for establishing criteria, administering examinations, and

issuing credentials pertaining to adult high school credentialing programs would satisfy the stated decision criteria.

1. Consistency With the Vision and Mission of the SEO

Transfer of these functions would initially seem to be consistent with the SEO vision and mission to support improvement of education of the District's citizens. Elsewhere in the country, school systems (LEAs) report to a separate higher level, usually an SEA, which is perceived as a neutral, trusted, and respected authority.

However, the stakeholders interviewed do not view the SEO as a neutral party that would fairly carry out its responsibilities, but rather perceive the SEO as a political entity.

While a transfer of the adult education function to the SEO may improve the way the related programs are monitored, it is important to note that, for the most part, programs are functioning well now, and that a successful transition can take place only if all of the related functions were transferred to the SEO.

2. Effect on the Transferring Agency

Under the SEO recommendation presented here, there would be no transfer; consequently, there would be no effect on the transferring agency.

3. Effect on the Quality of Educational and Other Services to Children and Adults

An initial examination of centralizing adult education in the SEO would seem to indicate it could improve the quality of educational services in general. In addition, centralizing would allow adult education to be viewed as a higher priority, as other states have recommended is advisable for maintenance of effective programs. However, due to the state of affairs in the city at this time (i.e., because of legislation just enacted two years ago, the SEA has not had a full opportunity to establish its programs, and the literacy community has undergone multiple changes in recent years), moving the SEA now could negatively impact the affected parties or result in a disruption of services to the adult literacy community, depending on the transfer method and timing. In five years, however, it might be appropriate to revisit this issue. Any transition plan would need to place highest priority on ensuring the continuity of services to the adults the programs serve and on remaining in compliance with Federal funding requirements.

4. Potential for Duplication of Functions

There would be two adult education offices — one located at UDC and another located at DCPS.

The SEO must be careful not to duplicate functions or create multiple reporting requirements and oversight functions. A transfer should not cause duplication of functions; however, the

SEO views the credential issuance process as a duplication of functions as it currently exists (i.e., diplomas are issued by the Board of Education and SEA issues GED certificates).

5. Effect on Reporting Requirements

There would be multiple sources for adult education reporting without one office to centralize and analyze the data.

There is little support or desire to create another layer of bureaucracy and additional reporting requirements unless these are needed.

6. Potential for Conflict of Interest

UDC and DCPS would continue to have conflicts of interest.

The SEO must be careful to concentrate functions and not duplicate them. In addition, the stakeholders interviewed do not view the SEO as a neutral party that would fairly carry out its responsibilities, but rather as a political entity.

7. Effect on Cost

DCPS adult education activities would not be Federally funded. Furthermore, local dollars would be distributed to more than one organization.