



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

**Quality Assurance and Compliance
Virtual Desk Monitoring Review
for
Adult Education and Career and Technical Education**

Jackson County School Board

June 2 – September 1, 2020

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Jackson County School Board
Adult Education and Career and Technical Education
Quality Assurance and Compliance Monitoring Report**

I. INTRODUCTION

The Florida Department of Education (FDOE), Division of Career and Adult Education (division), in carrying out its roles of leadership, resource allocation, technical assistance, monitoring and evaluation, is required to oversee the performance and regulatory compliance of recipients of federal and state funding. The Quality Assurance and Compliance (QAC) section is responsible for the design, development, implementation and evaluation of a comprehensive system of quality assurance including monitoring. The role of the quality assurance system is to assure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is incumbent upon the division to monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

II. AUTHORITY

The FDOE receives federal funding from the U.S. Department of Education (USDOE) for Career and Technical Education (CTE) under the Carl D. Perkins (Perkins) Strengthening Career and Technical Education for the 21st Century Act, and for Adult Education (AE) under the Workforce Innovation and Opportunity Act (WIOA) of 2014. FDOE awards sub-grants to eligible providers to administer local programs. FDOE must monitor providers to ensure compliance with federal requirements, including Florida's approved state plans for CTE and Adult Education/Family Literacy. Each state shall have procedures for reviewing and approving applications for sub-grants and amendments to those applications, for providing technical assistance, for evaluating projects and for performing other administrative responsibilities the state has determined are necessary to ensure compliance with applicable statutes and regulations pursuant to 34 CFR 76.770, Education Department General Administrative Regulations (EDGAR) and the Uniform Grant Guidance (UGG) for grant awards issued on or after December 26, 2014. The Florida Department of Education, Division of Career and Adult Education, is required to oversee the performance of sub-grantees in the enforcement of all laws and rules (Sections 1001.03(8) and 1008.32, Florida Statutes).

Additional citations noting pertinent laws and regulations and authority to monitor are located in the 2019-2020 Quality Assurance Policies, Procedures and Protocols, Module A, Section 1.

III. QUALITY ASSURANCE POLICIES, PROCEDURES AND PROTOCOLS

The Quality Assurance Policies, Procedures and Protocols manual was revised in the 2019-20 program year. The manual is provided to each provider prior to the monitoring visit. The manual provides a summary of each facet of the monitoring design and the process. It also contains protocols that may be used as agencies are monitored or reviewed. References may be made to the manual in this document; it is located on the division's website at <http://fldoe.org/academics/career-adult-edu/compliance>.

IV. PROVIDER SELECTION

Various sources of data are used throughout the implementation of the quality assurance system. The monitoring component of the system is risk-based. Risk assessment is a process used to evaluate variables associated with the grants and assign a rating for the level of risk to the department and the division. A risk matrix, identifying certain operational risk factors is completed for each provider. The risk matrix for

each program monitored is located in Appendix A. The results of the risk assessment process and consideration of available resources are used to determine one or more appropriate monitoring strategy(ies) to be implemented.

The QAC section may apply any specific monitoring strategy to any federal or state-funded provider at any time. There may be circumstances that may warrant onsite monitoring, desk monitoring review or other strategies regardless of a provider’s risk matrix score.

The monitoring strategy for Jackson County School Board (JCSB) was determined to be an onsite monitoring review, but due to limitations cause by the COVID-19 pandemic the strategy was changed to a virtual desk monitoring review. Notification was sent to Mr. Larry Moore, superintendent, Jackson County School Board on December 17, 2019. The designated representative for the agency was Ms. Phyllis Daniels.

The desk monitoring review was originally scheduled to be an onsite visit from May 20-21, 2020, but due to the COVID-19 pandemic the provider was rescheduled and given a due date of August 28, 2020. The representative of the division conducting the desk monitoring review was program specialist, Mr. Michael Swift of the Quality Assurance and Compliance section.

V. JACKSON COUNTY SCHOOL BOARD

ENROLLMENT:

Fiscal Year (FY) 2017-18

CTE (possible duplication at program level): Secondary – 3,551
 AE: 1,991

The provider was awarded the following grants for FY’s 2017-18, 2018-19 and 2019-20:

Finance

FY 2017-18

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	320-1918B-8CG01	\$ 120,640.00	\$ 11,869.69
Perkins CTE Secondary	320-1618A-8CS01	\$ 77,352.00	\$ 00.00
Perkins CTE Rural	320-1618A-8CR01	\$ 61,749.00	\$ 543.51

FY 2018-19

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	320-1919B-9CG01	\$ 120,640.00	\$ 00.00
Perkins CTE Secondary	320-1619B-9CS01	\$ 80,179.00	\$ 8,506.29
Perkins CTE Rural	320-1619B-9CR01	\$ 61,480.00	\$ 00.00

FY 2019-20*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	320-1910B-0CG01	\$ 120,640.00	\$ n/a
Perkins CTE Secondary	320-1610B-0CS01	\$ 86,233.00	\$ n/a
Perkins CTE Rural	320-1610B-0CR01	\$ 62,823.00	\$ n/a

* FY 2019-20 final project disbursement reports will not be available until the end of the program year

Additional information about the provider may be found at the following web address:
<https://www.jcsb.org/>

VI. MONITORING ACTIVITIES

The monitoring activities included pre and post visit planning, an entrance and exit conference, records review and interviews with administrators, when necessary.

Onsite Visits

No onsite visits were made during the desk monitoring process.

Entrance and Exit Conferences

An introductory teleconference for JCSB was conducted on June 2, 2020. The exit teleconference was conducted on September 1, 2020. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Phyllis Daniels	Director of Adults with Disabilities	X	X
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	X	X

Interviews

JCSB administrators were available via teleconference for interviews, if necessary.

Records Review

Program, financial and administrative records were reviewed. A complete list is provided in section VII, item F. Policies and procedures were reviewed and discussed at various times during the visit.

VII. RESULTS

- A. **ADMINISTRATION:** refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.
- Due to the small size of the district their CTE and AE grants are managed by a single person who has multiple years of experience in both program areas.
 - JCSB worked with numerous stakeholders during the Perkins V transition year to assist in the creation of the district comprehensive local needs assessment (CLNA). Local stakeholders include: community business people; educators (secondary and post-secondary); students; Chamber of Commerce representatives; and CareerSource Chipola representatives. The group analysis included data regarding program completion and state/regional job market trends as identified by the Department of Labor.
 - JCSB offers multiple opportunities for district-wide training and professional development. CTE administrators participate in annual district wide training sessions called CTE Convening which focuses on professional development, academic and CTE instruction. AE administrators take part in district lead and Panhandle Area Education Consortium (PAEC) sponsored professional development, as well as Coalition of Adult Basic Education (COABE) and ACE of Florida.
- B. **DATA AND ASSESSMENT:** refers to all the components of the data and assessment system, including test administration, test security, data collection and entry and reporting, as well as procedures. The use of data in program decision-making is also explored and commented upon.

- JCSB uses the FOCUS® system as their integrated management information system (MIS). All of the data elements required by the National Reporting System (NRS) were included in the system and verified during the VDMR.
- The district has MIS staff, particularly, the Data Entry Operator (DEO) position whose duties include data collection, entry and verification. Additionally, the provider employs a counselor whose duties also include data review and verification.
- There is a review/verification process that takes place prior to submitting student data to FDOE. The DEO and counselor are primarily responsible for responding to data error reports from the state. If correcting the missing or erroneous data presents additional questions, teachers are included in the reconciliation.
- Training is provided in NRS requirements, data collection procedures, data entry and in other pertinent areas of the MIS.
- The program administrative staff review and discuss student data on a regular basis. Data analysis provides information regarding instructional strategies, instructional materials and instructional delivery in an effort to meet the educational needs of our students.
- The district has internal controls that ensure each individual has access to only a specific part of the MIS to prevent too many people from being able to view sensitive student data.

C. **CURRICULUM AND INSTRUCTION:** refers to those elements that contribute to student learning and skill acquisition.

- JCSB offers CTE and AE programs across multiple secondary campuses and satellite sites throughout the county.
- The district uses media outlets, radio and newspaper, as well as social media and printed signs to recruit students. Additional efforts are also made to reach students most in need, including instructional offerings at the local county correctional facility.
- JCSB allows for reasonable services and accommodations to students who self-declare a disability.
- JCSB offers CTE students the opportunity to gain real life experience within some program areas. The culinary arts program provides students with an opportunity to learn how to operate a cafe and catering business. Additionally, agriculture programs include livestock projects which simulate business through the purchase, feeding and selling of an animal.
- Students have the opportunity to participate in multiple Career and Technical Student Organizations (CTSO). CTSOs throughout the district include:
 - Future Farmers of America
 - Health Occupation Students of America
 - Future Business Leaders of America
 - Technology Student Association
 - Family Community and Career Leaders of America
- AE instructors incorporate CTE skills and related content into classroom instruction.
- The district has a relationship and memorandum of understanding (MOU) with CareerSource Chipola to provide career services and training for students. This MOU seeks to align workforce processes to support WIOA implementation by creating strong partnerships with business and education to provide quality services for outreach, hiring, training, retraining and retention of workers.
- Tests of adult basic education (TABE) are used for student skill level assessment. All TABE test proctors are certified as required by FDOE and the testing companies.

D. **TECHNOLOGY AND EQUIPMENT:** refers to a review of the technology and equipment used by students and instructors in the classroom; addresses access, availability, innovation, use and condition.

- All inventory criteria set forth by EDGAR and the UGG is included within the inventory management system. The inventory management system was verified during the VDMR.
- The district has a technology plan that includes policies on new equipment requests, equipment safety/storage and disposal of old inventory.
- There have been no reports of stolen or lost equipment over the previous three fiscal years.

E. ACCESS AND EQUITY: refers to compliance with the requirements of federal non-discrimination laws as relating to recruitment, enrollment, participation and completion of programs.

- The Office of Equal Educational Opportunity (OEEO) for school districts is responsible for monitoring and overseeing civil rights compliance obligations. Should you have any questions or concerns, please contact the OEEO at 850-245-0511.

F. RECORDS REVIEW: refers to a review of the records and documents that evidence compliance with federal and state rules and regulations. A sampling of financial and programmatic records is reviewed.

- Size, scope and quality review
- MIS data quality checklists
- District policies and procedures for finance and procurement
- District technology plan
- Student and employee handbooks
- Policies and procedures on inventory/equipment management
- Memorandums of Understanding (MOUs) and articulation agreements

G. FINANCIAL: refers to aspects of the federal fiscal requirements that providers must meet when expending federal funds, including financial management, procurement, inventory management and allowable costs.

- The district has financial policies and procedures in place to ensure the efficient cash management of CTE and AE grant funds.
- Skyward is the district Enterprise Resource Planning (ERP) system. The system allows for shared knowledge of expenditures and real time balance activity.
- The district has detailed and thorough procedures for the procurement of equipment and inventory that is funded by its federal grants.
- JCSB has numerous checks and balances to ensure accurate accounting records. District bookkeepers, district level accounting specialists and finance specialists work with program administrative staff to keep track of all grant funded expenditures.
- Grant amendments are minimal, as the district aims to utilize all funds as early in the program year as possible. In the event that one is necessary the district does have deadlines and procedures for the submission of amendments to the state.

H. COLLABORATION: refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.

- JCSB has numerous collaborations and MOUs within the local community. They often offer additional educational and job experiences to students within the district. The list of partners include, but are not limited to:
 - CareerSource Chipola

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – JCSB is not required to complete a CTE Corrective Action Plan.

ADULT EDUCATION

1. Corrective Action Plan – JCSB is not required to complete an AE Corrective Action Plan.

IX. SUMMARY

Once the VDMR is completed, including receipt of additional requested information when applicable, a preliminary report is forwarded to the provider for review. Comments are accepted and will be considered at the discretion of the FDOE monitoring team lead. Once the final report is approved, it will be forwarded to the agency head with a copy sent to the provider designated contact person. The final report will be posted on the department's website at the following address: <http://fldoe.org/academics/career-adult-edu/compliance>.

Finally, the division issues a closure letter to the agency head and designated contact person. This letter indicates that all outstanding resolution items have been completed, when applicable, and that no further action is required. This letter will officially end your monitoring process.

On behalf of the department, the monitoring team extends its appreciation to all participants in the JCSB virtual desk monitoring review. Special thanks is offered to Ms. Phyllis Daniels for her participation and leadership during this process.

APPENDIX A

Jackson County School Board
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: Jackson County School Board					
Program Type: CTE					
Target Year: 2017-2018					
Monitoring Year: 2019-2020					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	7	<u>X 10</u>	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	3	<u>X8</u>	24
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	3	<u>X 8</u>	24
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					142

Data sources used for calculations: Prior to July 1, 2018

Jackson County School Board
Adult Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants					
Agency Name: Jackson County School Board					
Program Type: AE					
Target Year: 2017-2018					
Monitoring Year: 2019-2020					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	7	<u>X10</u>	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	1	<u>X 8</u>	8
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	1	<u>X 8</u>	8
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Adult Education Program Improvement Plan (AEPIP)	Target Not Met on 3 of 3 Indicators	5	0	<u>X 6</u>	0
	Target Not Met on 2 of 3 Indicators	3			
	Target Not Met on 1 of 3 Indicators	1			
	All targets met	0			
Agency Risk Score					110

Data sources used for calculations: Prior to July 1, 2018