

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

Wakulla County School District

**June 3 – August 5, 2020** 

Final Report

#### TABLE OF CONTENTS

I.	Introduction	1
II.	Authority	1
III.	Quality Assurance Policies, Procedures, and Protocols	1
IV.	Provider Selection	1
V.	Wakulla County School District	2
VI.	Monitoring Activities	3
VII.	Results	3
VIII.	Required Resolution Activities	6
IX.	Summary	6
	Appendix A	7

#### Florida Department of Education Division of Career and Adult Education

#### Wakulla County School District 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 21<sup>st</sup> 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 Wakulla County School District (WCSD) 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. Robert Pearce, superintindent, Wakulla County School District on December 17, 2019. The designated representatives for the agency were Ms. Sunny Chancy and Mr. William Walker.

The desk monitoring review was originally scheduled to be an onsite visit from May 4-6, 2020, but due to the COVID-19 pandemic the provider was rescheduled and given a due date of July 31, 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. WAKULLA COUNTY SCHOOL DISTRICT

#### ENROLLMENT:

#### Fiscal Year (FY) 2017-18

CTE (possible duplication at program level): Secondary – 1,745

AE: 1,991

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

#### **Finance** FY 2017-18 Grant Number Grant Amount Unexpended Grants Adult General Education 650-1918B-8CG02 32,388.00 \$ 8,882.66 \$ Perkins CTE Secondary 650-1618A-8CS01 43,273.00 \$ 575.04 Perkins CTE Rural 650-1618A-8CR01 61,662.00 \$ 6,844.11 FY 2018-19 Grants Grant Number Grant Amount Unexpended Adult General Education 650-1919B-9CG01 32,388.00 976.08 \$ \$ Perkins CTE Secondary 650-1619B-9CS01 46,795.00 473.77 Perkins CTE Rural \$ 650-1619B-9CR01 \$ 62,250.00 812.59 FY 2019-20\* Unexpended Grants Grant Number Grant Amount 650-1910B-0CG01 32.388.00 Adult General Education n/a

Perkins CTE Secondary	650-1610B-0CS01	\$ 52,402.00	\$ n/a
Perkins CTE Rural	650-1610B-0CR01	\$ 64,157.00	\$ n/a

<sup>\*</sup> 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: <a href="https://www.wakullaschooldistrict.org/">https://www.wakullaschooldistrict.org/</a>

#### 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 WCSD was conducted on June 3, 2020. The exit teleconference was conducted on Aug 5, 2020. The participants are listed below:

Name	Title	Entrance	Exit
		Conference	Conference
William Walker	Director of Adult Athletic and Diversity	X	X
	Recruitment		
Sunny Chancy	Chief Academic Officer	X	X
FDOE Monitoring			
Team			
Michael Swift	Program Specialist, QAC, FDOE	X	X

#### Interviews

WCSD 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.** <u>ADMINISTRATION:</u> refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.
  - CTE and AE administrators are heavily involved in all aspects of program management in areas such as program improvement; data and assessment; and inventory management.
  - There is a separation of duties between the administrative side of grant management and the financial side, but the organizational structure of a small district allows both sides to work together cohesively to ensure that there is a continuous flow of information between the two.
  - WCSD CTE administrators have an ongoing relationship with stakeholders for the creation and continued implementation of their comprehensive local needs assessment (CLNA) to be included with their 2020-2021 grant application to FDOE. Stakeholder meeting minutes and records were reviewed as part of the monitoring process.

- WCSD offers multiple opportunities for district-wide training and professional development. CTE and AE administrators and instructors participate in all trainings as required by their particular program areas. FDOE sponsored training events are also attended as required.
- **B.** <u>DATA AND ASSESSMENT:</u> 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.
  - WCSD 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 while onsite.
  - There is a review/verification process that takes place prior to submitting student data to FDOE. If any data errors are reported back to the district the school secretary and reports coordinator assist with correcting erroneous data.
  - The school secretary and data reports coordinator receive training in NRS requirements, data collection procedures, data entry and in other pertinent areas of the MIS.
  - Student and program data is utilized for program management and improvement. These data reviews help to identify exemplary programs, as well as those that may be struggling.
  - WCSD has staff with specific duties and responsibilities for data collection, entry and verification. The school secretary is responsible for data management, and the program director has weekly meetings to discuss and verify data.
  - 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.
  - The district does have policies and procedures for data collection, review and submission to FDOE.
- **C.** <u>CURRICULUM AND INSTRUCTION:</u> refers to those elements that contribute to student learning and skill acquisition.
  - WCSD offers CTE and AE programs across multiple secondary campuses within the county and one site in Panacea, FL.
  - WCSD offers reasonable services and accommodations to students who self-declare a disability.
  - WCSD does have a dual enrollment articulation agreement with Lively Technical College (LTC) that allows eligible students to earn college credits upon completion of an equivalent articulated course.
  - Students have the opportunity to participate in district On the Job Training (OJT) and School to Work programs where they have opportunities to engage in career oriented, vocational training.
  - AE instructors incorporate workforce preparation and technology skills into classroom instruction. Students are given materials and content related to jobs, careers and transition to postsecondary education.
  - The CTE programs are supported by advisory committees that meet throughout the program year. These committees play a pivotal role in improving the quality of CTE programs by offering insight on current industry and workforce trends.
  - The district has a relationship and memorandum of understanding (MOU) with CareerSource Capital Region to provide career services and training for students.
  - 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, and certifications were verified while onsite.

- **D.** <u>TECHNOLOGY AND EQUIPMENT:</u> 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 information technology director is responsible for all district equipment. A physical inspection and inventory of equipment takes place annually.
  - 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.
  - No capitalized equipment was purchased during the years monitored.
- **E.** <u>ACCESS AND EQUITY:</u> 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.
  - Advisory and CLNA committee minutes and records
  - District procurement/purchasing records
  - Size, scope and quality checklist 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
  - TABE certifications
  - Student progression plans
  - Memorandums of Understanding (MOUs) and articulation agreements
- **G. <u>FINANCIAL:</u>** 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 grants funds.
  - Skyward is the district Enterprise Resource Planning (ERP) system that includes accounting, procurement, inventory management and payroll records.
  - The district has detailed and thorough procedures for the procurement of equipment and inventory that is funded by its federal grants.

- Grant funded purchases must go through an extensive approval process prior to any grant funds being disbursed. The approval process includes grant administrators, finance staff and the district superintendent (when applicable).
- District administrators host regular reconciliation meetings to review budget expenditures to gauge budget utilization moving forward. These meetings allow for reallocation of funds, via amendment, if the opportunity exists.
- **H.** <u>COLLABORATION:</u> refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.
  - WCSD 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:
    - o Lively Technical College
    - o CareerSource Capital Region
    - o Tallahassee Community College
    - o Capital City Youth Services

#### VIII. REQUIRED RESOLUTION ACTIVITIES

#### **CAREER AND TECHNICAL EDUCATION**

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

#### ADULT EDUCATION

1. Corrective Action Plan – WCSD 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: <a href="http://fldoe.org/academics/career-adult-edu/compliance">http://fldoe.org/academics/career-adult-edu/compliance</a>.

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 WCSD virtual desk monitoring review. Special thanks is offered to Ms. Sunny Chancy and Mr. William Walker for their participation and leadership during this process.

#### APPENDIX A

#### Wakulla County School District Career and Technical Education Risk Matrix

## Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants

Agency Name: Wakulla Co. School District

Program Type: CTE
Target Year: 2017-2018
Monitoring Year: 2019-2020

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7		<u>X 10</u>	
<b>Number of Years Since Last</b>	5-6	5	7		70
Monitored	3-4	3	] /		70
	0-2	1			
	Upper Quartile	7			
<b>Total Budget for all Perkins</b>	Upper Middle	5	] ,	V0	24
<b>Grants Combined</b>	Lower Middle	3	3	<u>X8</u>	24
	Lower Quartile	1			
	4 or More	7		<u>X 8</u>	24
N I CD II C	3	5			
Number of Perkins Grants	2	3	3		
	1	1	1		
Change in Management	Yes	7	0	<u>X 6</u>	0
Information Systems (MIS) from Previous Fiscal Year	No	0	U		U
Agency CTE Program Director Change from	Yes	7	0	0 <u>X 6</u>	0
Previous Fiscal Year	No	0	U	<u> </u>	U
	Upper Quartile	7		<u>X 4</u>	
<b>Unexpended Funds from all</b>	Upper Middle	5			20
Perkins Grants Combined	Lower Middle	3	5		
Perkins Grants Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7			
Number of Findings from	Upper Middle	5			
the Office of the Auditor	Lower Middle	3	1	<u>X 4</u>	4
General	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					142

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

#### Wakulla County School District Adult Education Risk Matrix

### Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants

Agency Name: Wakulla Co. School District Program Type: AE

Program Type: **AE**Target Year: **2017-2018**Monitoring Year: **2019-2020** 

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7			
<b>Number of Years Since Last</b>	5-6	5	7	V10	70
Monitored	3-4	3	7	<u>X10</u>	70
	0-2	1			
	Upper Quartile	7	1		
Total Budget for all Adult	Upper Middle	5		<u>X 8</u>	8
<b>Education Grants Combined</b>	Lower Middle	3			
	Lower Quartile	1			
	4 or More	7			8
Number of Adult Education	3	5	_	77.0	
Grants	2	3	1	<u>X 8</u>	
	1	1			
Change in Management Information Systems (MIS)	Yes	7	0	X 6	0
from Previous Fiscal Year	No	0	U	<u>A 0</u>	U
Agency CTE Program Director Change from Previous Fiscal	Yes	7	0	<u>X 6</u>	0
Year	No	0			
	Upper Quartile	7	3	<u>X 4</u>	12
Unexpended Funds from all	Upper Middle	5			
<b>Adult Education Grants</b>	Lower Middle	3			
Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7		<u>X 4</u>	4
Number of Findings from the	Upper Middle	5			
Office of the Auditor General	Lower Middle	3	1		
Office of the Additor General	Lower Quartile	1			
	0	0			
	Target Not Met on 3 of 3 Indicators	5			
Adult Education Program	Target Not Met on 2 of 3	3	1	<u>X 6</u>	6
Improvement Plan (AEPIP)	Indicators Target Not Met on 1 of 3 Indicators	1			
	All targets met	0			
		Ü	Agency	Risk Score	108

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