



Quality Assurance and Compliance Monitoring

Adult Education and Family Literacy

Nassau County School District

Final Report

June 7, 2012

FLORIDA DEPARTMENT OF EDUCATION



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June 18, 2012

Dr. John L. Ruis, Superintendent
Nassau County School District
1201 Atlantic Avenue
Fernandina Beach, Florida 32034-3499

Dear Superintendent Ruis:

We are pleased to provide you with the Final Report of Monitoring of the Adult Education and Family Literacy program from our visit on May 7-8, 2012. The report will also be placed on our website at <http://www.fldoe.org/workforce/compliance.asp>.

We appreciate the leadership and professionalism demonstrated by your staff during the review process. If we can be of any assistance, please contact Eileen L. Amy, Director of Quality Assurance and Compliance. Ms. Amy may be reached at 850/245-9033, or via electronic mail at Eileen.Amy@fldoe.org.

Thank you for your continuing commitment to improve services for Florida's students.

Sincerely,

A handwritten signature in black ink, appearing to read "Rod Duckworth".

Rod Duckworth

RD/ela

Enclosure

C: Curtis S. Gaus
Shahrokh Massoudi
Eileen L. Amy

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Florida Department of Education
Division of Career and Adult Education

**Nassau County School District
Adult Education and Family Literacy
Quality Assurance 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 section of the Bureau of Grants Administration and Compliance (Bureau) 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 Florida Department of Education receives federal funding from the U.S. Department of Education for Adult Education and Family Literacy under the Adult Education and Family Literacy Act of 1998. 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 adult education and 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 (34 CFR 76.770). The Florida Department of Education, Division of Career and Adult Education is required to oversee the performance of district school boards in the enforcement of all laws and rules (Sections 1001.03(8) and 1008.32, Florida Statutes (F.S.)).

Additional cites noting authority to monitor and pertinent laws and regulations are located in the 2011-12 *Quality Assurance Policies, Procedures, and Protocols*, Module A, Section 1.

III. QUALITY ASSURANCE POLICIES, PROCEDURES, AND PROTOCOLS

The *2011-12 Quality Assurance Policies, Procedures, and Protocols* 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://www.fldoe.org/workforce/compliance.asp>.

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 Florida Department of Education and the Division of Career and Adult Education. 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 monitoring strategy for Nassau County School District was determined to be an onsite visit. Notification was sent to Dr. John L. Ruis, Superintendent of Nassau County School District, on November 4, 2011. The designated representative(s) for the agency was Curtis Gaus, Coordinator for Adult and Career Education and Dropout Prevention.

The onsite visit to the agency was conducted May 7- 8, 2012, by two representatives of the Quality Assurance and Compliance Section of the Division: Program Specialists, Dr. Shahrokh Massoudi, and Mr. Rick Lockenbach, J.D.

V. NASSUA COUNTY SCHOOL DISTRICT

The total student enrollment for Adult Education in 2010-11 is 498.

The provider was awarded the following grants for FY 2009-10 and 2010-11:

2009-2010			
<u>Grant Number</u>	<u>Type</u>	<u>Total</u>	<u>Unexpended Funds</u>
Adult General Education	450-1910A-0CG01	\$86,143	\$1,857.73 unspent
EL/ Civics	450-1930A-0CE01	\$24,824	\$0 unspent
2010-2011			
<u>Grant Number</u>	<u>Type</u>	<u>Total</u>	<u>Unexpended Funds</u>
Adult General Education	450-1911A-1CG01	\$86,143	\$0 unspent
EL/ Civics	450-1931A-1CE01	\$24,824	\$1,959.92 unspent

Additional information about the provider may be found at the following web address:

www.nassau.k12.fl.us

VI. MONITORING ACTIVITIES

The monitoring activities included pre-visit planning conference calls; entrance conference; interviews with administrators, teachers, students; observations; record reviews; and an exit conference by phone.

Onsite Visits

Members of the team made onsite visits to the following locations:

- Callahan Adult Education Center
- Fernandina Beach Adult Education Center
- Hilliard Adult Education Center
- Yulee Adult Education Center
- Betty Cook Center
- District Office

Entrance Conference

The entrance conference for the Nassau County School District was conducted on May 7, 2012, and included:

- Susan Farmer, Executive Director of Business
- Curtis Gaus, Coordinator, Adult and Career Education and Dropout Prevention

- Jessica Borlard, Program Specialist
- Dr. Shahrokh Massoudi, Program Specialist, Quality Assurance and Compliance
- Rick Lockenbach, Program Specialist, Quality Assurance and Compliance

Interviews/Observations

Interviews were conducted with the administrative staff, instructional staff, program and transition specialists and students. Thirteen interviews and five observations were completed. All interviews and observations were held during the course of the visit.

Records Review

Program, financial and administrative records were reviewed. A minimum of five student records were reviewed. Some policies and procedures were reviewed at the agency's website and discussed at various times during the onsite visit.

Exit Conference

The exit conference for the Nassau County School District was conducted by phone on May 15, 2011 and included:

- Eileen L. Amy, Director, Quality Assurance and Compliance
- Curtis Gaus, Adult and Career Education and Dropout Prevention
- Jessica Borlard, Program Specialist
- Dr. Shahrokh Massoudi, Program Specialist, Quality Assurance and Compliance
- Rick Lockenbach, Program Specialist, Quality Assurance and Compliance

VII. RESULTS

NASSAU COUNTY SCHOOL DISTRICT

May 7-8, 2012

- A. ADMINISTRATION** refers to the management and/or supervision of programs, grant oversight, access and equity and other administrative areas.
- The new coordinator has initiated an adult high school program; presently there are 100 students at four locations around the county, making this program accessible to students.
 - Coordinator has relocated the Adult Education classroom in Callahan to make it more accessible, and students can eat lunch at the school located next door.
 - Coordinator is beginning an ESOL family literacy program in the summer.
 - There is a comprehensive Adult Education policies and procedures manual.
 - District coordinator has multiple responsibilities, including Adult Education, CTE, attendance, dropout prevention, Science, Technology, Engineering, and Mathematics (STEM), and GED Chief Examiner.
 - Program Specialist meets with students to review TABE results and to discuss future goals with students as part of orientation meeting.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

None

- B. DATA AND ASSESSMENT** refers to all the components of the data system, including data collection, entry, and reporting. The use of data in program decision-making is also explored and commented upon. Assessment addresses the types of assessment used, local and state assessment policy compliance.

- District is moving from Gateway to FOCUS to improve data functionality.
- The Policies and Procedures Manual addresses data collection and reporting.

- Data and program staff attend WEDDAC/CCTCMIS meetings.
- Data and program staff are working closely together to ensure data accuracy.
- Publisher guidelines are being followed for the TABE Test.
- A program specialist conducts assessment and holds an intake/registration meeting with parent and student.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

None

C. CURRICULUM AND INSTRUCTION refers to those elements which contribute to student learning and skill acquisition. It also addresses student and instructor observations.

- A variety of instructional materials were available for student use.
- Teachers are following curriculum frameworks.
- District is moving forward in implementing Career Pathways initiative and the five-year strategic plan.
 - Student folders contain career and other student information that is available to students when they leave Adult Education.
 - Students discuss careers as part of program orientation provided by the program specialist.
 - Adult High School students are able to take a three-credit course that addresses life skills and careers.
- Students can enroll in the GED Online Program to be able to study on their own if they have a TABE score at a certain level.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

1. Concern: A history textbook at the Hilliard site is dated 2001.

Recommendation: Review instructional materials on a regular basis.

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

- The District is using Florida Applied Technology Distance Education Consortium (FATDEC) and Educational Options software; students use this software extensively.
- DOE staff located equipment on inventory purchased with grant funds.
- The inventory contained all the required elements.
- Technology was being used by students and teachers.
- Computer labs were located in various locations.

FINDINGS

No findings of non-compliance were noted.

CONCERNS AND RECOMMENDATIONS

1. Concern: The district website is not user-friendly

Recommendation: Consider revising the website to make it more user-friendly

Agency response: District is working to address this issue.

E. LEARNING ENVIRONMENT encompasses all aspects of the physical environment where classes are held. Describing the learning environment may also attempt to capture the vision, philosophy, and character that is observed on the campus or in the classroom.

- Many teachers are experienced, and multiple teacher certifications is common
- Teachers are very committed to students; teachers make appropriate referrals to meet student needs.
- Teachers are connecting well with students.
- The environment is conducive to student learning, with student guidelines, posters, and other appropriate materials posted in the classrooms.
- Classrooms are clean and well-organized for instruction.
- There is adequate staffing with teachers and paraprofessionals to provide students one-on-one instruction as needed.
- One teacher purchased copies of the book *Hunger Games* and took students to the movie from her own funds to encourage student reading.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

Concern: Students in Adult High School attend class all day with few breaks from their studies that are largely self-paced.

Recommendation: Consider varied instructional and enrichment activities such as guest speakers.

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

- District has an equity coordinator.
- District provides annual staff development on access and equity.
- District staff is aware of the recent Genetic Identification Nondiscrimination Act (GINA) protections, and the coordinator has conducted staff development on these protections.
- Non-discrimination notices were available and widely posted.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

1. Concern: Adult Education materials do not all contain nondiscrimination notices.

Recommendation: Add non-discrimination statements as these materials are reprinted and new materials are created.

Agency response: Agency intends to add these notices as these materials are updated or new materials are developed.

G. RECORDS REVIEW refers to a review of the records and documents that evidence compliance with federal and state rules and regulations. Both financial and programmatic records are reviewed.

- Student Handbook
- Application for Adult Education
- Purchase orders
- Non-Discrimination statements
- Financial and Board Policies and Procedures
- Personnel Activity Reports (PARs) and Certification Statements
- Travel requests, authorizations, and reimbursement documentation
- Professional development plans
- Inventory lists for equipments purchased from grants
- Code of Student Conduct
- District Website
- Student Records, including registration forms and student pre- and post-test results

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

None

H. FINANCIAL refers to aspects of the Federal fiscal requirements that providers must meet when expending Federal funds, including a financial management system, a procurement system, and an inventory management system.

- Financial policies and procedures posted on the district website were reviewed.
- The sample documentation for staff travel was reviewed, no issues noted
- Samples of Personnel Activity Reports (PARs) for staff funded in part with Federal Adult Education funding were reviewed and are in compliance.
- Purchase order requests and accompanying documentation were reviewed; the Superintendent approves purchases of \$1,000 or more.
- The district has manuals that address purchasing and travel.
- The Coordinator receives monthly expenditure reports, helping to ensure timely expenditure of funds.

FINDINGS

No findings of non-compliance were noted at this time.

CONCERNS AND RECOMMENDATIONS

None

I. COLLABORATION refers to the collaborative agreements, partnerships, or memoranda of understanding to benefit an agency's programs and students.

- Coordinator moved the office to Florida State College at Jacksonville's joint use building, where the GED test is administered, and making post-secondary CTE programs more accessible to students.
- The Adult Education Program has a steering committee that meets quarterly.
- The District works closely with other agencies to obtain needed services for students, including counseling and financial assistance.
- The District provides transportation on a space available basis for adult education students on their buses.

FINDINGS

No findings of non-compliance were noted

CONCERNS AND RECOMMENDATIONS

NONE.

J. STUDENT PERSPECTIVES refers to the views and opinions expressed by students who are enrolled in the agency's programs. These perspectives may be shared individually or during focus group interviews.

- Students love their classes and the individual attention they are receiving.
- Career Pathways initiative was appreciated by students.
 - Students are using CHOICES extensively to research career options and resources.
- Students appreciate the accessibility of their Adult Education classes.
- Students expressed desire to have supplemental learning materials for home study, including applicable websites.

FINDINGS

No findings of non-compliance were noted

CONCERNS AND RECOMMENDATIONS

None

VIII. REQUIRED RESOLUTION ACTIVITIES

ADULT EDUCATION

1. Action Plan – The district must provide an Action Plan to address the concerns noted in the focus areas, C, D, E and F in Section VII of this report, see Appendix B.

Once the Action Plan is submitted, reviewed, and approved, if appropriate, the co-leader of the onsite visit is responsible for the regular follow-up with the agency's designated representative to ensure that resolution is complete.

IX. TARGETED TECHNICAL ASSISTANCE

Targeted technical assistance may be provided to support full compliance and systemic change for program improvement. Staff is encouraged to contact Division staff to assist their efforts toward systemic change.

X. REMARKS or POSITIVE PRACTICES

Additional comments were made by the Quality Assurance Team in regard to the monitoring visit: The District Adult Education Program serves the needs of multiple communities, as there are programs in four different cities. In addition to a teacher at each site, the District has committed a paraprofessional to provided additional support for students. The District provides transportation on a space available basis for Adult Education students on their buses. Student folders that are available to students when they leave Adult Education is noteworthy, as well as the Adult Education policies and procedures manual.

XI. SUMMARY

Once the field work, including receipt of requested information is completed, a draft report is forwarded to the provider for review. Comments are accepted and considered. The final report is completed and forwarded to the Agency Head with a copy to the appropriate parties. The Bureau's site visit co-leader monitors and conducts follow-up activities to assure issues have been satisfactorily completed within the stated timelines. Finally, the Bureau issues a Closure Notice to the Agency Head and designated contact person. This notice indicates all outstanding items have been completed.

We want to extend our appreciation to all participants in the Nassau County School District onsite monitoring visit. Special thanks to Mr. Curtis Gaus for his participation and leadership in this process.

**Appendix A
ADULT EDUCATION RISK MATRIX**

Risk Factor	Criteria Scale	Value (V)	Risk Factor Weight	Total Points
Total amount of agency funding from grants (2009-10)	\$ 2,000,001+	8	X 6	24
	700,001 - 2 million	6		
	300,001 - 700,000	5		
	< 300,000	4		
Number of grants per agency (2009-10)	Number of grants (2)	$2 \times 2 = 4$	X 6	24
Number of grants with 10% or more of unexpended funds (2009-10)	Number of grants (0)	0×5	X 4	0
Audit findings relevant to internal control weaknesses during three (3) previous years for targeted agency.	16 + findings	10	X 10	100
	11-15 findings	8		
	5-10 findings	6		
	1-4 findings	4		
Key organizational change within the last two (2) years.	Director (#) Yes = 1 No = 0	$1 \times 1 = 10$	V x 4	40
TOTAL Level of Risk Score				188

**Appendix B
Nassau County School District Resolution Plan
Adult Education Action Plan**

ACTION PLAN	<u>Strategies</u>	<u>Person Responsible</u>	<u>Projected Date of Completion</u>
Concerns: 1. Adult Education materials do not all contain nondiscrimination notices	Nondiscrimination notices will be added to website, and all printed material when replacement is ordered.	Curtis Gaus, Coordinator	Spring 2013
2. Students in Adult High School attend class all day with few breaks from their studies that are largely self-paced.	Program specialist and teachers will design interactive lessons to be used in Adult High School classes to include but not limited to guest speakers, field trips, contextualized learning activities.	Jessica Borland, Program Specialist	Fall 2012
3. A history textbook at the Hilliard site is dated.	5 copies of each current district adopted text will be ordered for classroom reference material.	Curtis Gaus, Coordinator	Fall 2012
4. The district website is not user-friendly.	District is in the process of contracting new website providers which contain a search engine.	NCSB IT staff	Spring 2013
Technical Assistance Needed and/or Provided:			
Date and Status of Action – Completed/Pending			
Plan submitted by: Curtis S. Gaus Date: June 6, 2012 Plan accepted by: Eileen L. Amy Date: June 7, 2012			