**Quality Assurance and Compliance
Onsite Monitoring Visit
for
Career and Technical Education**

Palm Beach County School District
December 10-13, 2012

Final Report

March 8, 2013

FLORIDA DEPARTMENT OF EDUCATION

March 8, 2013

Mr. E. Wayne Gent, Superintendent
Palm Beach County School District
3300 Forest Hill Blvd., Suite C-316
West Palm Beach, Florida 33406-5869

Dear Superintendent Gent:

We are pleased to provide you with the Final Report of the onsite monitoring visit of the Adult Education and Family Literacy and Career and Technical Education programs from our visit on December 10-13, 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 Sheryl Walden, Program Specialist, with the Division of Quality Assurance and Compliance. Ms. Walden may be reached at 850/245-9036, or via electronic mail at Sheryl.Walden@fldoe.org.

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

Rod Duckworth

RD/pr

Enclosure

Cc: Peter Licata

  Sheryl Walden

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Florida Department of Education
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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 Division 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 Career and Technical Education Act of 2006. 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. 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).

Additional cites noting authority to monitor and pertinent laws and regulations are located in the 2012-2013 *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 2012-13 program year. The Manual was 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://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 FDOE 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 monitoring strategy for Palm Beach County School District (PBCSD) was determined to be an onsite visit. Notification was sent to Mr. E. Wayne Gent, Superintendent, PBCSD, on July 18, 2012. The designated representative for the agency was Dr. Jeraline Marsh, Lead Career Education Curriculum Specialist.

The onsite visit to the agency was conducted December 10-13, 2012, by four representatives of the Quality Assurance section of the Division: Eileen L. Amy, Director of Quality Assurance and Compliance, and Program Specialists, Rick Lockenbach, Sheryl Walden and Tashi Williams.

V.   PALM BEACH COUNTY SCHOOL DISTRICT

CTE Secondary	CTE Postsecondary	Total
56,254	0	56,254

Finance: The provider was awarded the following grants:

2010-2011

CAREER AND TECHNICAL EDUCATION GRANTS

Type	Total	Unexpended Funds
Perkins Secondary	$1,788,699	$145,471

2011-2012

CAREER AND TECHNICAL EDUCATION GRANTS

Type	Total	Unexpended Funds
Perkins Secondary	$1,716,326	$49,011

2012-2013

CAREER AND TECHNICAL EDUCATION GRANTS

Type	Total	Unexpended Funds
Perkins Secondary	$1,688,740	$1,289,471

Additional information about the provider may be found at the following web address:
http://www.palmbeachschools.org/

VI.   MONITORING ACTIVITIES

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

Onsite Visits
Members of the monitoring team made onsite visits to the following locations:

- Olympic Heights High School, Boca Raton
- Royal Palm Beach High School, Royal Palm Beach
- Boca Raton High School, Boca Raton
- Forest Hill High School, West Palm Beach
- Glades High School, Belle Glade
- Inlet Grove Charter School, Riviera Beach
- Wellington High School, Wellington
- Palm Beach Lakes High School, West Palm Beach

- Lake Worth High School, Lake Worth
- Park vista High School, Lake Worth
- South Tech Academy, Boynton Beach

Entrance and Exit Conferences
The entrance conference for the Palm Beach County School District was conducted on December 10, 2012; the exit conference was conducted on December 13, 2012. The participants are listed below:

	Title	Entrance Conference	Exit Conference
Peter B. Licata	Director	X	X
Jeraline Marsh	CTE Specialist	X	X
Sylvia Tricarico	CTE Specialist	X	X
Miguel Benavente	CTE Specialist	X	X
Liz Shapiro	CTE Resource Teacher	X	
Michelle Martin	Budget	X	
Jim Politis	CTE Specialist	X	X
Jay Boggess	CTE Specialist	X	X
Kareem Thompson	CTE Specialist		X
Steven Kozak	CTE Coordinator, South Tech		X
Myron Cost	Principal, South Tech		X
FDOE Monitoring Team			
Eileen L. Amy	Director of Quality Assurance and Compliance	X	X
Rick Lockenbach	Program Specialist	X	X
Tashi Williams	Program Specialist	X	X
Sheryl Walden	Program Specialist	X	X

Interviews/Observations
Interviews were conducted with the administrative staff, instructional staff, program and transition specialists, and students. A minimum of two interviews and observations were completed at each site. All interviews and observations were held during the course of the visit.

Records Review
Program, financial and administrative records were reviewed. A complete list is provided in Section VIII, F. A minimum of 20 student records were reviewed. Some policies and procedures were reviewed at the agency's website and discussed at various times during the onsite visit.

VII.   RESULTS

Palm Beach County School District
December 10-13, 2012

A. **ADMINISTRATION** refers to the management and/or supervision of programs, structure of programs and services, grant oversight, and other administrative areas.

- The CTE Specialists were valuable positions within the school environment. They encouraged increased communication across the District among like classes.
- Principals were dynamic leaders, supportive of CTE, and used data to make decisions about their respective schools and programs.
  - Principals were encouraged to share CTE information with academic teachers.
- Administration and instructional staff were also using data to identify current status and growth potential.

- Demographics of the schools reflected the demographics of the communities.
- Monitoring staff found a positive nature within the schools.
  - The District's vision seemed to be a guiding force for contributing to a positive culture.
- Schools used the resources available within the school. For example, CTE students in Construction classes painted one school and built a ramp for a student who had knee surgery. Other CTE students developed brochures and web pages.
- The District was using positive Behavioral Support in schools.
- Career and Technical Student Organizations (CTSOs) were highly prevalent and active on local, state and national events.
- Participation in advisory committees was evident across the schools.
- The District was linking clusters with Career Pathways.

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

CONCERNS AND RECOMMENDATIONS
Concern: Some teachers stated that they felt that they were "out-of-the-loop" when it came to receiving CTE information from the administration.

Recommendation: The District is encouraged to share data and other pertinent information with instructional staff in a timely manner, through regular staff meetings, emails, or other means.

B. **DATA** refers to all the components of the data system, including data collection, entry, and reporting, as well as procedures. The use of data in program decision-making is also explored and commented upon.

- Verification of student industry certification data was completed. The FDOE provided a random list of students and the District provided student files for review and verification.
- Management Information Systems (MIS) processes were extensive and supported the submission of required reports to FDOE.
- Data was used in decision-making when evaluating programs.
- The number of homeless students participating in CTE programs within the District was perhaps under-reported. The District needed to be more aware of the homeless population that they are currently serving.

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

CONCERNS AND RECOMMENDATIONS
Concern: The District reported only 28 homeless students participating in CTE programs.

Recommendation: CTE students need to be surveyed to determine the actual number who are homeless so that they can be referred to programs and services that will help meet their needs.

Agency Response: The number homeless students taking a CTE course reported during the visit reflected the number of students coded as homeless and taking at least one CTE course as of September, 2012. The slide containing homeless information for CTE students was updated and reported during exit interview to reflect numbers as of November 30, which was 75 homeless tudents taking at least one CTE course. The CTE Team will continue to collaborate with the Homeless Education
Assistance Resource Team to ensure homeless students are taking advantage of CTE programs/academies. As of 2/6/13, 191 homeless students are taking CTE courses. Data slides will be updated each quarter during the school year to reflect accurate numbers.

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

- Students were making progress and earning certifications.
- Teachers/students we interviewed indicated that not many students were pursuing a public postsecondary CTE credential. The focus instead was on four-year degrees and on private schools, colleges and universities; only a few of those we saw verbalized the value of pursuit of careers.
- The FDOE frameworks were used in programs.
- National Career Academy Coalition (NCAC) standards were being followed.
- The District was working toward having model academies.
- Varying degrees of the integration between academies and academics were observed.
- Schools were offering the course sequence that enabled certifications to be completed.
- The District process required to offer new programs is thorough and comprehensive.
- Online software seemed more evident than textbooks in classrooms.
- Schools with a smaller number of programs or schools just starting programs did not seem to know the level of support available from the District office and needed assistance regarding curriculum development.
- Some Assistant Principals (APs) were assigned areas of curriculum and provided a strong base for those teachers within that area of instruction.
- Administration needed to be aware that some teachers are getting their certification at the same time as the students.
- Individual attention was being given to individual learning styles.
- Transportation was an issue for many schools, although the 6:00 p.m. bus in some schools allows for participation in after-school activities, including clubs and events.
- Curriculum revision completed during each summer paired CTE specialists and math, reading and science teachers for review of curriculum frameworks.
- Common Core Standards staff training was being provided.
- We found limited awareness of public postsecondary opportunities; private universities and colleges were mentioned but we never heard students mention Palm Beach State College.
- Project based learning was linked with involvement in community.

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

CONCERNS AND RECOMMENDATIONS
Concern: Emphasis was placed on attainment of a four-year postsecondary degree at colleges and universities over options such as pursuing industry certification or two-year CTE degrees. Needs of students who want to learn a trade and not pursue postsecondary education are not being met.

Recommendation: Some students will not pursue degrees following graduation. Strategies should be developed to meet their needs of developing a career or learning a trade while in high school.

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.

- Technology was being used in classes and as reinforcement. For example, cell phones were allowed to be used during lunch in some schools.
- Monitoring staff experienced difficulty in getting inventories until later in the visit. All elements as required by the Education Department General Administrative Regulations (EDGAR) 80.32 (d)(1) did not appear on the inventory provided.
- The District tracked some equipment less than $500, although the threshold is $1,000.
- With higher levels of course content, some schools have issues with equipment and software; the hardware needs to be upgraded in order to run the most current software. (Information Technology (IT).
- Equipment was normally tagged at the site depending upon where it is received; vendors have often tagged computers.
- The District refresh/replacement plan was five years but it has now been moved to a three-year plan.

- Staff is aware of what equipment was purchased with Perkins funds.
- Instructors have alternative resources to maintain equipment.
- All equipment seemed to be in good repair and accessible to students.
- Surplussed computer equipment is often refurbished and donated to students needing computers.

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

CONCERNS AND RECOMMENDATIONS
Concern 1: Inventory lists were provided late in the visit, and some elements of the inventory were missing.

Recommendation: Refer to EDGAR 80.32 (d) (1) for a list of the elements required for the inventory list. Provide inventory lists reflecting equipment purchased with Perkins funds when updated.

Agency Response: Inventory lists were provided in a comprehensive format to reviewers upon the initial interview. The format provided contained information, but needed to be revamped as a list for easier location of information. This was done in a timely manner and provided to reviewers upon initial school visits. Revised lists were also provided to each school receiving an onsite visit to make available for the reviewers.   Equipment lists will be formatted using the revised format for ease of use in the future.

Concern 2: With higher levels of course content, some schools have issues with equipment and software.

Recommendation: When software is purchased, make sure that current hardware has the capacity and speed to run it. Some computers need to be upgraded in order to run the most current software available in CTE classes.

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.

- Teachers knew there was a non-discrimination policy. They also knew to report any instances to their building representative or principal.
- Non-discrimination notices were posted.
- The non-discrimination statement needs to be added to published materials next time they are printed.
- Access to classes by students with disabilities and non-traditional students was observed.
- Priority hiring status was given to students who participated in teacher education coursework, earned teaching degrees and returned to the District.
- District funds were being used to pay for industry certification exams.
- Not all students have access to basic technology classes.

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

CONCERNS AND RECOMMENDATIONS
Concern: Monitoring staff did not find the non-discrimination statement routinely in printed materials such as brochures and other marketing materials.

Recommendation: When next printed or published, brochures, handbooks, and other materials should contain the District's official non-discrimination statement and cover, at a minimum, all the following protected classes: race, color, religion, sex, national origin, age, disability, marital status, and genetic information.

F. RECORDS REVIEW refers to a review of the records and documents that are evidence as compliance with Federal and state rules and regulations. Samples of financial and programmatic records are reviewed.

- Travel operating procedures 2012-13
- Perkins in-county and out-of-county travel
- Capital Asset Policy and Procedures
- School Board Policy on Purchasing
- Purchasing Card documentation
- Choice Program Booklet
- Student Handbook
- Faculty Handbook
- Code of Student Conduct
- Individual school materials/handbooks
- Student records
  o electronic
  o cumulative folders
  o certifications

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

CONCERNS AND RECOMMENDATIONS
None.

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.

- Allocations of Perkins funds to individual schools was made according to needs, wants, and wishes (in that order) and strategic planning.
- Expenditures and applicable documentation were reviewed with no issues noted.
- Purchasing Card documentation was reviewed.
- Travel documentation indicates the District is following state policy and documentation is thorough and complete.
- Financial awareness sessions were held for staff and academy coordinators assigned to each school.

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

CONCERNS AND RECOMMENDATIONS
None.

H. STUDENT PERSPECTIVE – The team meets with groups of students; their perspective is presented as a portion of this report.

- Students represented diverse cultures.
- Students were well-spoken, represented their schools with enthusiasm, and were proud of their CTE programs.
- Students were complimentary of teachers, counselors, and the administration, and students relied on them for information, guidance, and support.
- Students appreciated the individual attention from instructors.
- Students loved the hands-on learning opportunities.

VIII.   PROGRAM IMPROVEMENT PLAN – A program improvement plan is required when an agency does not meet 90% of its agreed-upon goals for individual performance measures.

Palm Beach County School District met or exceeded all secondary measures. Therefore, no Program Improvement Plan was required.

IX.   REQUIRED RESOLUTION ACTIVITIES

<u>CAREER AND TECHNICAL EDUCATION</u>

1. Corrective Action Plan – PBCSD is not required to complete a Corrective Action Plan, as no findings were noted.

2. Action Plan – The agency must provide an Action Plan (Appendix B) to address the concerns noted in the focus areas A, C, D, and E in Section VII of this report.

Once the Action Plan is submitted, reviewed, and approved, 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.

X.   REMARKS or POSITIVE PRACTICES

The following are additional comments made by the Quality Assurance Team in regard to the monitoring visits:
- A common lunch period for an entire school was phenomenal and gave great access to teachers during that time.
- Although transportation home following school activities was an issue for many schools, the 6PM bus in some schools allowed for participation in after school activities, including CTSOs, clubs and events.

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. Finally, the Division issues a Closure Notice to the Agency Head and designted contact person. This notice indicates all outstanding items have been completed.

We want to extend our appreciation to all participants in the PBCSD's onsite monitoring visit. Special thanks to Peter Licata, Director of Workforce Education, for his participation and leadership in this process. Thanks are also extended to Dr. Jeraline Marsh, Career Education Curriculum Specialist, for her cheerful assistance before, during, and after the monitoring visit.

APPENDIX A
Palm Beach County School District
Career and Technical Education Risk Matrix

Risk Factor	Criteria Scale	Value	Risk Factor Weight	Total Points
Total amount of agency funding from grants (2010-11)	$ 2,000,001+	8	x 6	36
	700,001 – 2,000,000	**6**		
	300,001 - 700,000	5		
	< 300,000	4		
Number of grants per agency (2010-11)	Number of grants	(1) x 2	x 6	12
Number of grants with **10%** or more of unexpended funds (2010-11)	Number of grants	(0) x 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		
Change in Director within the last two (2) fiscal years.	Yes = 1 No = 0	(1) x 10	x 4	40
TOTAL Level of Risk Score				188

Type of Plan	Strategies	Person Responsible	Projected Date of Completion
Corrective Action Plan Finding(s): None			
Action Plan Concern(s): 1. Some teachers stated that they felt that they were "out-of-the-loop" when it came to receiving CTE information from the administration. 2. Emphasis was placed on attainment of a four-year postsecondary degree over options such as pursuing industry certification or two-year CTE degrees. Needs of students who want to learn a trade and not pursue postsecondary education are not being met.	1. Improve communication to school-based personnel and CTE teachers via emails, face-to-face meetings and school visits and/or official District bulletins in a timely manner with updates going out to teachers at least once per quarter or sooner where applicable 2. The School District of Palm Beach County places emphasis on students graduating both college and career ready. To this end, continued marketing and professional development will take place to ensure CTE students are aware of all options available to them upon graduation. Continued emphasis will be placed on assisting more students to earn industry certifications and improving on our 75.7% passage rate. The Department will also continue to investigate the feasibility of adding additional CTE related trades programs into our schools. The District will work closer with area apprenticeship organizations to increase students graduating with trades, related knowledge and skills. We will provide additional professional development to CTE teachers and counselors on	Peter B. Licata Peter B. Licata Jeraline M. Marsh Jay Boggess	Ongoing throughout school year. Begins in August, ends in June. By June 30, 2013. Ongoing.

	articulated credit.		
3. With higher levels of course content, some schools have issues with equipment and software.	3. The CTE team will continue to work with the District IT department to ensure equipment purchased has the capacity to run efficiently. Develop new process for CTE teachers to report issues with equipment.	Peter B. Licata Jay Boggess Jim Politis	By June 30, 2013. Ongoing.
4. Monitoring staff did not find the non-discrimination statement routinely in printed materials such as brochures and other marketing materials.	4. Work with school and District personnel to ensure non-discrimination is included in print documents and other marketing tools.	Peter B. Licata Sylvia Tricarico	By June 30, 2013. Ongoing.

Technical Assistance Needed and/or Provided:

Plan submitted by (name and title):__ **Peter B. Licata – Director, Choice & Career Options**__Date:__ **2/15/13**_____

Plan accepted by:_ Gloria Spradley Brown - Chief, Bureau of Grants Administration and Compliance ___Date:_3/4/13_____

Status of Resolution Plan (to be completed by DOE staff)

Date	Status of Plan Completion