

# Quality Assurance and Compliance Onsite Monitoring Visit for Adult Education and Career and Technical Education Follow-up to the December 2014 Resolution Plan

Orange County School District

October 5-8, 2015

Final Report



#### **State Board of Education**

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November 16, 2015

Pam Stewart Commissioner of Education

Rod Duckworth, Chancellor
Division of Career and Adult Education

Dr. Barbara Jenkins, Superintendent Orange County School District 445 West Amelia Street Orlando, Florida 32801-0271

Dear Dr. Jenkins:

We are pleased to provide you with the final monitoring report for the adult education programs at the Orange County School District. The final report will also be placed on the Quality Assurance and Compliance website at <a href="http://fldoe.org/academics/career-adult-edu/compliance">http://fldoe.org/academics/career-adult-edu/compliance</a>.

We appreciate the leadership and professionalism demonstrated by your staff during our visit. If we can be of any assistance, please contact Tashi D. Williams, director of Quality Assurance and Compliance, at 850-245-9033 or <u>Tashi.Williams@fldoe.org</u>.

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

Sincerely,

Rod Duckworth

RD/tdw/dw

Enclosure

cc: Dr. Michael Armbruster, senior executive director, Adult, Career and Technical Education Rosa Grant, senior director, Adult, Career and Technical Education Gloria Spradley-Brown, bureau chief, Grants Administration and Compliance Tashi D. Williams, director, Quality Assurance and Compliance Donna Waller, program specialist, Quality Assurance and Compliance Michael Swift, program specialist, Quality Assurance and Compliance

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# Florida Department of Education Division of Career and Adult Education

Orange County School District
Adult Education and Career and Technical Education
Follow-up to the December 2014 Resolution Plan
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 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) Career and Technical Education Act of 2006 and for Adult Education (AE) under the Adult Education and Family Literacy Act of 1998. FDOE awards subgrants 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 subgrants 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 subgrantees 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 2015-2016 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 2015-16 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 <a href="http://fldoe.org/academics/career-adult-edu/compliance">http://fldoe.org/academics/career-adult-edu/compliance</a>.

#### 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 monitoring strategy for the Orange County School District was determined to be an onsite visit. Notification was sent to Dr. Barbara M. Jenkins, superintendent of the Orange County School District, on August 7, 2015. The designated representative for the agency was Ms. Rosa Grant, senior director, for adult, career and technical education.

The onsite visit to the agency was conducted October 5, 2015 through October 8, 2015, by three representatives of the Quality Assurance and Compliance section of the division: Mr. Tashi Williams, director, Quality Assurance and Compliance section and program specialist Mr. Michael Swift and Ms. Donna Waller.

## V. ORANGE COUNTY SCHOOL DISTRICT

Enrollment: (possible duplications at the program level):

ENROLLMENT:

Fiscal Year (FY) 2013-14:

Adult General Education 8.030

CTE Secondary

35,614 (possible duplication at program level)

CTE Postsecondary

5,057 (possible duplication at program level)

The provider was awarded the following grants for FY's 2013-14, 2014-15 and 2015-16.:

# FY 2013-14

<u>Grants</u>	<u>Grant Number</u>	Grant Amount	<u>Unexpended</u>
Adult General Education	480-1914A-4CG01	\$ 1,471,376.00	\$ .00
English Literacy/Civics Education	480-1934A-4CE01	\$ 517,793.00	\$ .00
CTE Perkins Secondary	480-1614A-4CS01	\$ 1,718,428.00	\$ 31,940.81
CTE Postsecondary	480-1614A-4CP01	\$ 452,594.00	\$ 10,101.02
FY 2014-15			
Grants	Grant Number	Grant Amount	Unexpended
Adult General Education	480-1915A-5CG01	\$ 1,524,936.00	\$ 119,144.40
English Literacy/Civics Education	480-1935A-5CE01	\$ 320,928.00	\$ 4,577.25
CTE Perkins Secondary	480-1615A-5CS01	\$ 2,044,072.00	\$ .00
CTE Perkins Postsecondary	480-1615A-5CP01	\$ 506,382.00	\$ .00
FY 2015-16			
<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Adult General Education	480-1916B-6CG01	\$ 1,524,936.00	\$ N/A
English Literacy/Civics Education	480-1936B-6CE01	\$ N/A	\$ N/A
CTE Perkins Secondary	480-1616A-6CS01	\$ N/A	\$ N/A
CTE Perkins Postsecondary	480-1616A-6CP01	\$ N/A	\$ N/A

Additional information about the provider may be found at the following web address: <a href="https://mxww.ocps.net">https://mxww.ocps.net</a>

## VI. MONITORING ACTIVITIES

The monitoring activities included pre-visit planning conference calls, an entrance conference, interviews with administrators, teachers, students, observation, records review, inventory and an exit conference.

# Onsite Visits

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

- Orange County School District Office
- Edgewater High School
- Westside Technical Education Center
- Dr. Phillips High School
- Orlando Technical Education Center
- Mid Florida Technical Education Center
- Winter Park Technical Education Center (Avalon Campus)
- Winter Park Technical Education Center

# **Entrance and Exit Conferences**

The entrance conference for the Orange County School District was conducted on October 5, 2015; the exit conference was conducted on October 8, 2015. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Ms. Carol Tingley	CTE/AE Senior Administrator	X	
Ms. Michelle Berggren	CTE/AE Senior Administrator	X	
Ms. Jodie Rolston Cary	CTE/AE Senior Administrator	X	
Ms. Dawn Judd-Raymond	CTE/AE Senior Administrator	X	
Dr. Mike Armbruster	Senior Executive Director of Adult, Career and Technical Education	X	
Ms. Rosa Grant	Senior Director of Adult, Career and Technical Education	X	X
Ms. Alysia Leonard	CTE/AE Applications Administrator		X
FDOE MONITORING TEAM			
Mr. Tashi D. Williams	Director, Quality Assurance and Compliance Section, FDOE	X	X
Mr. Michael Swift Ms. Donna Waller	Program Specialist, FDOE Program Specialist, FDOE	X X	X X

# <u>Interviews/Obs</u>ervations

Interviews and/or observations were conducted during the course of the visit with selected administrative staff, teachers, and students. A minimum of 10 interviews and observations were held during the course of the visit

## Records Review

Program, financial, administrative records and student records were reviewed. A complete list is provided in section VII, item G. A minimum of 15 student records were reviewed. 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.
  - The AE curriculum framework is used for all programs as established by the department.
  - Members of all levels of administration work collaboratively toward the goals of the district.
  - The district conducts staff development for all staff biannually or as needed.
  - Dr. Michael Armbruster, adult, career and technical education senior executive director, and Ms. Rosa Grant, adult, career and technical education senior director, are committed to the success of the adult, career and technical education programs.
- **B.** <u>DATA AND ASSESSMENT</u> refers to all the components of the data and assessment system, including test administration, test security, data collection, entry, and reporting, as well as procedures. The use of data in program decision-making is also explored and commented upon.
  - Student data of AGE completers and non-completers were reviewed and verified during the onsite visit.
  - The data staff works with the program staff to assure effective processes.
  - Data is used when evaluation AE programs.
  - The senior director of the AE programs and administration review data to ensure the correct data is collected and reported to the department.
  - The district currently utilizes the CampusVue® software for data collection.
  - Data is currently verified at the district level. The data is verified against what is submitted by the schools.
  - The teachers are also collecting student information including attendance and grades with the CampusVue® software.
- **C.** <u>CURRICULUM AND INSTRUCTION</u> refers to those elements which contribute to student learning and skill acquisition. It also addresses student and instructor observations.
  - The team observed a variety of instruction taking place for students. Individualized instruction using computer software, and textbooks, group learning and lectures.
  - Programs consist of a combination of instructional and everyday practical living skills for students.
  - Technology and materials used in the classrooms are current.

# **CONCERNS AND RECOMMENDATIONS**

• Concern C1: Additional space and equipment is needed for the evening ESOL class at Orlando Technical Education Center.

- o Recommendation Concern C1: Additional space and equipment should be provided for the ESOL class at Orlando Technical Education Center.
- Concern C2: Additional I pads and/or tablets are needed at Mid Florida Technical Education Center. Students are using their cell phones for research.
  - o Recommendation Concern C2: Consider evaluating the need for purchasing additional I pads and/or tablets for the students at Mid Florida Technical Education Center.
- **D.** <u>TECHNOLOGY AND EQUIPMENT</u> 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 has a technology replacement plan.
  - Technology was incorporated with the teaching process.

# **FINDINGS AND RECOMMENDATIONS**

- Finding D1: The equipment inventory listing did not follow the rules and guidelines as specified in EDGAR (34 CFR 80.32 (d) (1)).
  - o Recommendation Finding D1: The equipment inventory listing must follow the rules and guidelines as specified in EDGAR (34 CFR 80.32 (d) (1)).

# **CONCERNS AND RECOMMENDATIONS**

- Concern D1: Equipment was in a different location from the equipment inventory lists that was provided, at Orlando Technical Education Center and Mid Florida Technical Education Center.
  - o Recommendation Concern D1: Equipment transfer forms must be used when transferring equipment from one location to a different location.
- Concern D2: The inventory list, serial and or FA numbers were difficult to locate and identify at Orlando Technical Education Center, Mid Florida Technical Education Center and Winter Park Technical Education Center.
  - o Recommendation Concern D2: Both serial and FA numbers should be affixed to all equipment and assessable by sight.
- Concern D3: One piece of equipment at Mid Florida Technical Education Center had a different serial number from the equipment inventory list that was provided.
  - Recommendation Concern D3: Assure the serial number and/ or FA number is consistent with the actual inventory.
- Concern D4: A HP 6470B laptop at Mid Florida Technical Education Center could not be located.
  - Recommendation Concern D4: Inventory should be conducted more often to assure accountability of equipment.
    - Agency Response Concern D4: HP 6470B laptop was located at Mid Florida Technical Education Center. 10/9/2015 Received picture of HP 6470 B laptop.

- **E.** <u>LEARNING ENVIRONMENT</u> 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.
  - The school campus, classrooms and grounds were well maintained.
  - Students interviewed were content with all aspects of their learning environments.
  - Students receive individualized instruction in classes, as needed.
- **F.** <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 850-245-9556.
- **G. RECORDS REVIEW** refers to a review of the records and documents that evidence compliance with federal and state rules and regulations. Samples of financial and programmatic records are reviewed.
  - Organizational chart
  - Program site information
  - Advisory Board handbook, agenda, and minutes
  - Staff and grant duties
  - Completed AE grant applications
  - AE grants 2013-14 through 2015-16
  - Final disbursement reports (DOE 499's)
  - Equipment inventory
  - 2015-16 Student handbook and employee handbook
  - Student records
  - Policies and procedures
  - Program brochures
  - Schedule of classes
  - School locations and directions guide 2015-16
  - Orange County Public Schools technical centers catalog 2015-16
  - Student planner 2015-16
  - Verification of student AGE completers and noncompleters (samples)
  - School District website
- **H. <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.
  - An approval process for expending federal funds is currently in place.
  - Documentation reviewed for time and effort, payroll and travel expenditures was organized and thorough.
  - Expenditures are monitored through the systems applications and products (SAP) software and the district's enterprise data warehouse (EDW) system.
  - Purchases over \$50,000.00 are required to be approved by the school board.

- **I.** <u>COLLABORATION</u> refers to the collaborative agreements, partnerships, or memoranda of understanding (MOUs) that are in place to benefit an agency's programs and students.
  - Community Outreach
  - Coalition for the Homeless
  - Hal Marston Community Center
  - Salvation Army
  - Taft Community Center
  - Transition ACE
  - John Bridges
  - Orlo Vista
  - Dover Shores Community Center
  - Bithlo Community Center
- J. <u>PERKINS LOCAL PROGRAM IMPROVEMENT PLAN</u> A Perkins local program improvement plan (PIP) is required when an agency does not meet 90% of its agreed-upon goals for individual performance measures.
  - Pursuant to the Carl D. Perkins Career and Technical Education Improvement Act of 2006 (Perkins IV), Section 123(b) (2), if a state finds that a local eligible agency has failed to meet agreed upon target levels as described in Section 113(b) (4) of the Act and is not making substantial progress in meeting the goals, the state will work with the agency to help implement improvement activities. Additionally, Section 123(b)(4)(A) of the law specifies that "If a local eligible agency fails to meet at least 90% of an agreed upon State adjusted level of performance for the same core indicator of performance for three (3) consecutive years then the state is required to provide technical assistance."

# **Secondary Measures:**

- o In 2013-14 the agency met or exceeded all secondary measures except for the following therefore; a local program improvement plan (PIP) was required for the following:
  - 2S1 Secondary Technical Skills: Local Actual 38.58% vs. 85.65% Local Agreed
  - 6S1 Non-traditional enrollment: Local Actual 37.50% vs. 42.66% Local Agreed

#### **Postsecondary Measures:**

- o In 2013-14, the agency did not meet all post-secondary measures therefore, a local improvement plan was required for the following:
  - 3A1 Retention or Transfer: Local Actual 49.56% vs. 56.06% Local Agreed
  - 5A1 Non-traditional enrollment: 11.88% Local Actual vs. 13.41% Local Agreed
- **K.** <u>STUDENT PERSPECTIVE</u> The team meets with groups of students; their perspective is presented as a portion of this report.
  - Students were complimentary of teachers, counselors and the administration.
  - Students expressed pride in their AE programs and facilities.
  - AE students in the Orange County School District represent diverse cultures and ages.
  - Students appreciated the individualized instruction that they receive.
  - Information regarding financial aid, assistance and resources are available.
  - The time and locations of the AE programs are convenient

## VIII. REQUIRED RESOLUTION ACTIVITIES

## **ADULT EDUCATION**

- 1. Corrective Action Plan Orange County School District is required to complete a Corrective Action Plan.
- 2. Action Plan Orange County School District is required to complete an Action Plan.

# CAREER AND TECHNICAL EDUCATION

- 1. Corrective Action Plan Orange County School District is not required to complete a Corrective Action Plan.
- 2. Action Plan Orange County School District is not required to complete an Action Plan.

## IX. SUMMARY

Once the field work is completed, including receipt of requested information, a draft report is forwarded to the provider for review. Comments are accepted and considered. The final report is completed, forwarded to the agency head with a copy to the appropriate parties, and is posted on the department's website at the following address: <a href="http://fldoe.org/academics/career-adult-du/compliance">http://fldoe.org/academics/career-adult-du/compliance</a>.

Finally, the division issues a closure notice to the agency head and designated contact person. This notice indicates all outstanding resolution items have been completed.

On behalf of the department, the monitoring team extends our appreciation to all participants in the Orange County School District onsite monitoring visit. Special thanks are offered to Ms. Rosa Grant, senior director for adult, career and technical education for her participation and leadership in this process.

# APPENDIX A

# Orange County School District Adult Education and Family Literacy Risk Matrix

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

Agency Name: ORANGE COUNTY SCHOOL DISTRICT

Program type: **ADULT EDUCATION** 

Target Year: 2013-2014 Monitoring Year: 2015-2016

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points	
	UpperQuartile	7	7	<u>X 10</u>		
Total AE Budget	Upper Middle	5			7 X 10 70	70
Allocated Value	Lower Middle	3			. •	
	LowerQuartile	1				
# AE	4+	7				
# AE Grants	3	5	3	<u>X 8</u>	24	
Value	2	3		<u> </u>	27	
	1	1				
AE	Yes	7	0			
Director Change Value	No	0		<u>X 6</u>	0	
	Upper Quartile	7		<u>X 4</u>		
AE Funds	Upper Middle	5	0			
Remaining Point	Lower Middle	3			0	
Value	Lower Quartile	1				
	0	0				
	Upper Quartile	7				
OAG	Upper Middle	5	7			
Findings Value	Lower Middle	3		<u>X 4</u>	28	
	Lower Quartile	1				
	0	0				
		AG	ENCY RIS	K SCORE:	122	

<sup>\*</sup>Compliance monitoring last visit: AE, Spring 2011

<sup>\*</sup>Data sources used for calculations: Prior to July 1, 2014

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

Agency Name: **ORANGE COUNTY SCHOOL DISTRICT** Program type: **CAREER AND TECHNICAL EDUCATION** 

Target Year: 2013-2014
Monitoring Year: 2015-2016

Metric	Scaling	Point Value	Points Assigned	Weight	<b>Total Metric Points</b>
	Upper Quartile	7			
Total	Upper Middle	5	7		
Perkins	Lower Middle	3		<u>X 10</u>	70
Budget Allocated Value	Lower Quartile	1		<u>X 10</u>	70
	4+	7			
# Perkins	3	5			
Grants	2	3	5	<u>X 8</u>	40
Value	1	1		<u> 11 0</u>	10
	7.50 - 10.00	7			
Perkins	5.00 - 7.49	5			
PIP Index	2.50 - 4.99	3	3	<u>X 8</u>	24
Value	0 <index<2.50< td=""><td>1</td><td></td><td></td></index<2.50<>	1			
	0	0			
Perkins	Yes	7			
Director			0	<u>X 6</u>	0
Change	No	0	U	<u>A 0</u>	V
Value					
Perkins	Upper Quartile	7			
Funds	Upper Middle	5			
Remaining	Lower Middle	3	7	<u>X 4</u>	28
Point	Lower Quartile	1			
Value	0	0			
	Upper Quartile	7			
OAG	Upper Middle	5			
Findings	Lower Middle	3	7	<u>X 4</u>	28
Value	Lower Quartile	1		<u> </u>	20
,	0	0			
		AGI	ENCY RISK S	SCORE:	190

<sup>\*</sup>Compliance monitoring last visit: CTE, Fall 2014

<sup>\*</sup>Data sources used for calculations: Prior to July 1, 2014

# APPENDIX B

# Orange County School District Adult Education and Family Literacy Resolution Action Plan

Corrective Action(s) and/or Action(s)	Action or Strategy to Address Findings or Concerns	Agency Response	Person Responsible	Projected Date of Completion
Corrective Actions (findings):				
Finding D1: The equipment inventory listing did not follow the rules and guidelines as specified in EDGAR (34 CFR 80.32 (d) (1)).	Recommendation Finding D1: The equipment inventory listing must follow the rules and guidelines as specified in EDGAR (34 CFR 80.32 (d) (1)).	We follow the rules of EDGAR. All inventory is maintained on a district database. A spreadsheet was created to identify CTE grant purchases, however when extracting the items from the main spreadsheet some columns were inadvertently excluded.	Rosa Grant, Senior Director	This is being done
Actions (concerns):				
Concern C1: Additional space and equipment is needed for the evening ESOL class at Orlando Technical Education Center.	Recommendation Concern C1: Additional space and equipment should be provided for the ESOL class at Orlando Technical Education Center.	We have added another section and teacher to service the ESOL students at Orlando Tech	Joseph Raymond, Senior Administrator	This was done at the next start date 10/27/15
Actions (concerns):				
Concern C2: Additional I pads and/or tablets are needed at Mid Florida Technical Education Center. Students are using their cell phones for research.	Recommendation Concern C2: Consider evaluating the need for purchasing additional I pads and/or tablets for the students at Mid Florida Technical Education Center.	IPad are not available for individual teacher use. IPad and charging carts are provided to schools so that teachers can use the iPad on a rotation schedule.  Teachers are able to check out iPad when	Margaret Wilster, Senior Administrator	

		their lesson plans call for iPad.		
Actions (concerns):				
Concern D1: Equipment was in a different location from the inventory lists that were provided, at Orlando Technical Education Center and Mid Florida Technical Education Center.	Recommendation Concern D1: Equipment transfer forms must be used when transferring equipment from one location to a different location.	Transfer paperwork will be completed for offsite equipment	Joseph Raymond, Senior Administrator Teresa Saffold Washington, Assistant Director	November 15, 2015
Actions (concerns):				
Concern D2: The inventory list, serial and or FA numbers were difficult to locate and identify at Orlando Technical Education Center, Mid Florida Technical Education Center and Winter Park Technical Education Center.	Recommendation Concern D2: Both serial and FA numbers should be affixed to all equipment and assessable by sight.	We will re-write the serial numbers and FA numbers so that they are visible and assessable by sight.	Joe Raymond, Senior Administrator Teresa Saffold Washington, Assistant Director Tom Ott, Assistant Director	December 15, 2015
Actions (concerns):				
Concern D3: One piece of equipment at Mid Florida Technical Education Center had a different serial number from the equipment inventory list that was provided.	Recommendation Concern D3: Assure the serial number and/ or FA number is consistent with the actual inventory.	When extracting the numbers perhaps an error was made, we will extract other items off the main list in order to reduce human error	Rosa Grant	This is being done
Actions (concerns):				

Concern D4: A HP 6470B laptop at Mid Florida Technical Education Center could not be located.  Recommendation Concern D4: Inventory should be conducted more often to assure accountability of equipment.		Agency Response Concern D4: HP 6470B laptop was located at Mid Florida Technical Education Center. 10/9/2015 Received picture of HP 6470 B laptop.	Teresa Saffold Washington, Assistant Director	10/9/2015
Plan submitted by (name a		or Director MA	nast Date: [1	3 15
Status of Action Plan (to	be completed by DOE staff)		The state of the s	A na tri danti trasi ti a companyi sa is
Date:	Status of Plan Completion:			