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

Gulf County School District

February 26-27, 2018

Final Report
# TABLE OF CONTENTS

I. Introduction ................................................................................................................................. 1
II. Authority ....................................................................................................................................... 1
III. Quality Assurance Policies, Procedures, and Protocols .............................................................. 1
IV. Provider Selection ....................................................................................................................... 1
V. Gulf County School District ........................................................................................................ 2
VI. Monitoring Activities .................................................................................................................. 3
VII. Results ......................................................................................................................................... 3
VIII. Required Resolution Activities .................................................................................................. 10
IX. Summary ..................................................................................................................................... 10
   Appendix A ..................................................................................................................................... 11
   Appendix B ..................................................................................................................................... 13
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) Career and Technical Education Act of 2006, 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 2017-2018 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 2017-18 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 Quality Assurance and Compliance 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 Gulf County School District (GCSD) was determined to be an onsite visit. Notification was sent to Mr. James Norton, Superintendent of Gulf County School District, on November 17, 2017. The designated representative for the agency was Ms. Lori Price, assistant superintendent of instruction, Office of Instructional Services.

V. GULF COUNTY SCHOOL DISTRICT

ENROLLMENT:

Fiscal Year (FY) 2015-16
AE: 51
CTE (possible duplication at program level): 728

The provider was awarded the following grants for fiscal years (FY) 2015-16, 2016-17 and 2017-18:

FY 2015-16

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Additional information about the provider may be found at the following web address: https://www.gulfcoschools.com/
VI. MONITORING ACTIVITIES

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

Onsite Visits
Members of the team made onsite visits to the following locations:
• GCSD administrative office

Entrance and Exit Conferences
The entrance conference for GCSD was conducted on February 26, 2018. The exit conference was conducted on February 27, 2018. The participants are listed below:

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<td>Coordinator of Adult and Alternative</td>
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<td>Duane McFarland</td>
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<td>Michael Swift</td>
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<td>LaStacia Spencer</td>
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Interviews
Interviews were conducted with the administrative staff. All interviews were held during the course of the visit.

Records Review
Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, item F. A minimum of 30 student records were reviewed. Policies and procedures were reviewed and discussed at various times during the visit.

VII. RESULTS

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

• The administrators for AE and CTE serve multiple roles within the school district. This leads to a collective wealth of information that is easily shared among the administration.
• Although relatively new to career and technical education, the CTE director is learning at a rapid pace and has prior academic experience that has been key to his transition.
• The district has checks and balances and internal controls to ensure proper oversight of grant management and program operation.
B. **DATA AND ASSESSMENT:** refers to all the components of the data and assessment system, including test administration, test security, data collection and entry and reporting, as well as procedures. The use of data in program decision-making is also explored and commented upon.

- GCSD utilizes FOCUS to house and track student data and information.
- There is a multi-tiered process for the input, review and submission of student data to FDOE.
- There is specific staff and administrators who are trained on how to interpret data results and how that data is used for continuous program improvement.
- The district has internal controls that assures only a select few individuals have access to student and program data.
- All test proctors are up to date on their certifications and/or training. The monitoring staff verified the certifications while on-site.
- Student data was received and reviewed while onsite.
- Upon review of the student records, the monitoring staff discovered that multiple students listed as secondary CTE completers were awarded occupational completion points (OCP) that the student did not actually attain.

**FINDING AND CORRECTIVE ACTION**

- Finding B1: The provider failed to accurately report student data in FY 2015-16 (UGG 2 CFR 200.328 Monitoring and reporting program performance, F.S. 1008.43 Career program reporting requirements). After review of the records, it was determined that GCSD awarded two students OCPs in Carpentry but both students failed to complete all of the required courses for attainment of the reported OCP. This resulted in incorrect student data reports being submitted to FDOE.
  - Corrective Action B1: GCSD is required to conduct a training session utilizing resource modules created by FDOE data staff. The training modules to be utilized for the district training include: *Reporting OCPs Training- Secondary and Reporting OCPs- Postsecondary.* The training will cover the areas of how to recognize and award completion points and how to validate student data. Once the district completes their training session, they will be required to create and/or update their policies and procedures manual on how to identify, award and submit student OCP attainment. This manual will serve as a learning tool for all current and incoming data personnel and CTE teachers.

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

- The district is making strides to increase performance measures in areas such as student reading skills. District staff and the monitoring team discussed the various methods currently being utilized by GCSD to increase their performance measures.
- The district does have exemption policies for students with disabilities. Once a student self-declares a disability the district will provide any accommodation allowable by law to assist in that student’s education.
- CTE administrators are dedicated to ensuring that their teachers and counselors have the proper training and guidance to properly assist students within their programs.
D. **TECHNOLOGY AND EQUIPMENT:** refers to a review of the technology and equipment used by students and instructors in the classroom; addresses access, availability, innovation, use and condition.

- The district made no capitalized equipment purchases over the past three FYs.
- The district does have policies and procedures for equipment purchases.

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

- The Office of Equal Educational Opportunity (OEEO) for school districts is responsible for monitoring and overseeing civil rights compliance obligations. Should you have any questions or concerns, please contact the OEEO at 850-245-9556.

F. **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.

- GCSD district website
- District policies and procedures for finance and procurement
- Policies and procedures for data collection, verification and submission
- Technology plan
- Student and employee handbooks
- Policies and procedures on inventory/equipment management
- Complete financial records for employee travel
- Verification of student records
- Program Improvement Plan (PIP)
- Memorandums of Understanding (MOUs) and articulation agreements
- Grant funded employees time and effort (T&E) reports
- CTE advisory committee minutes, agendas and sign-in sheets
- District and program sponsored training and records

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

- The district is transitioning from FOCUS to SKYWARD for their financial management system.
- GCSD has financial policies and procedures in place to ensure the efficient cash management of AE and CTE grant funds.
- The monitoring team reviewed T&E reports and travel records, and found these documents to be in accordance with state and federal policies.
- The district finance manager is knowledgeable in the financial operations of the AE and CTE programs.
- The district has internal controls that ensure the proper management and flow of federal grant funds. All purchases no matter the value must be approved by the district superintendent.
- GCSD does not utilize purchasing cards for grant funded expenditures.
H. **COLLABORATION:** refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency’s programs and students.

- GCSD has numerous industry and academic partnerships throughout the local region. These collaborations include, but are not limited to the following:
  - Northwest Florida State College (NWFSC)
  - Gulf Coast State College (GCSC)
  - Florida Masonry Association
  - CareerSource Gulf Coast
  - Haney Technical College (HTC)

I. **PERKINS LOCAL PROGRAM IMPROVEMENT PLAN:** A Perkins local PIP is required when an agency does not meet 90% of its agreed-upon goals for individual performance measures.

- CTE PIPs were discussed over the course of the interview process. The district does have plans and strategies in place to increase their performance measure numbers.
- The monitoring team reviewed PIPs for the following measures:

**Secondary Measures 2015-16**
In 2015-16 the agency met or exceeded all secondary measures except for the following; therefore a PIP was required:
- 1S1 Academic Attainment- Reading: Local Actual of 85.00% vs. Local Agreed of 97.56%
- 5S1 Secondary Placement: Local Actual of 67.65% vs Local Agreed of 81.26%
- 6S1 Non-Traditional Enrollment: Local Actual of 28.24% vs Local Agreed of 32.50%

J. **PROGRAMS OF STUDY:**

**Implementation of Programs of Study**
As part of the new DCAE assistance process, all agencies selected for a monitoring visit each project year will receive special technical assistance on POS and their development and implementation. The section of the monitoring protocol concerning POS has been expanded and the narrative and supporting materials for this section were collected prior to the onsite visit. During the monitoring visit to GCSD, Cathy Hammond, Bruce Harrington, and Lee Chipps-Walton of the Federal and State Initiatives (FSI) section of the DCAE discussed, via a conference call, the submitted narrative and materials on POS with GCSD staff on February 27, 2018. A summary of the conference call discussion compiled by the FSI team appears below.

**Program of Study: Administrative Office Specialist (AOS) (secondary)**

**Enrollment**
- Enrollment in this program of study has decreased over the last few years as has enrollment district-wide. This is due to a local economic downturn, causing a number of families to leave the area.

**Program Content**
- The course content is aligned with the curriculum framework for the program, which includes content relevant to industry certifications. The industry certifications for the AOS POS are provided by Certiport, providing a secure testing environment.
- The AOS POS prepares students for entry into postsecondary office administration programs. It is applicable to other programs as well as it covers Excel, PowerPoint, etc., skills which are translatable to many professions and future postsecondary training.
In this POS, students do mock interviews, some real-life projects and focus on employability skills.

Placement after Program Completion
- After completion of the POS, staff estimated that at least 30% of their students move on to postsecondary, but do not generally finish. There is a local articulation agreement with NWFSC for their Office Administration AS degree program.
- The AOS program can help prepare students for any office job. Employment is an issue in the area, and many students have to move out of the area to find work.

Programs of Study Overall
Local Economy and CTE Programs
- CTE programs in GCSD are intricately linked to community needs, local economic trends and availability of resources and personnel. Gulf County has experienced a downturn in the local economy. The largest employer in the area, a paper mill, closed causing families to leave the area to find employment. As families have moved away, the school population has declined. Port St. Joe is the most affluent and diverse city in the district, while Wewahitchka is less developed with fewer businesses. CTE programs depend on the local availability of instructors trained in the program area, given that it is a small district. The retirement of one instructor can mean the end of a program, as is the case with carpentry.
- Staff on the call noted changing economic conditions that have or will impact the CTE programs offered and hopefully improve job opportunities in the area: the gulf oil spill and funds available to address its impact; a large land sale to AgServices Inc.; potential of expanded ship building; expanding tourism; and potential expansion of the deep water port (funded by BP Deep Water Horizon recovery monies).
  - The district hopes to see $250,000 in funding from the oil spill to build their welding program at Wewahitchka High. The funds are supposed to be available in March. That funding and the potential for expanded ship building has increased the need for welders. Given these circumstances, welding will be replacing carpentry at Wewahitchka High.
  - The district also hopes to build on tourism in the Port St. Joe area with the development of a culinary arts program to prepare students to move into the tourism industry.
  - The sale of more than 300,000 acres to AgServices, Inc. has increased focus on the agriculture program. The company approached the district with an interest in seeing increased training in agriculture.
  - Eastern Shipping Group, located just outside of Panama City, has received a $10.5 million contract with the Coast Guard and will potentially provide opportunities for both welders and carpenters to apply for jobs immediately after graduation.
- Recent program-specific surveys by middle and high school principals found that students are interested in culinary arts as well as welding. In addition, annual climate surveys give students an opportunity to offer feedback and CTE is often cited by students as an area for expansion.

Collaborative Relationships/Partnerships
- An advisory committee for all programs of study has been formed and includes CTE and school administrators, representatives from local business, GCSC, parents and Career Source. The committee met on January 30, 2018 and will meet again June 8, 2018.
- Historically there has been minimal involvement from postsecondary institutions in the programs of study, but this is changing. There is an agreement in place with NWFSC, and a developing relationship with GCSC, which seems very promising. There are academic dual enrollment agreements with GCSC but none for CTE at the present. The presence of the
representatives from GCSC on the advisory committee presents opportunities for greater collaboration with postsecondary.
  
  o GCSC would like to meet soon with GCSD to identify potential pathways. Culinary Arts would be one of these pathways. GCSC also has a campus in the area, and they have requested oil spill money to establish a science, technology, engineering and math (STEM) center.
  
  o Another pathway under consideration is with HTC in welding.

• Local businesses participate in the advisory committee but are not involved in curriculum development. There are work study opportunities in Port St. Joe for some students, but these are not true internships. Local placement is a goal but currently there are not sufficient opportunities.

**Employment Opportunities after Program Completion**

• Given the local economic conditions, there are limited employment opportunities in the area causing challenges to placement of students after program completion and graduation. Many students have to move out of the area to find work. Opportunities for employment are greater in Port St. Joe than in Wewahitchka.

• To assist students in obtaining employment after program completion/graduation, teachers in some programs may incorporate employability skills and interviewing skills. Guidance counselors cover resumes with students.

• District staff on the call indicated that their welding students do find work, but it is often out of state (and therefore not trackable by the State for Perkins). Although pay is good, the jobs often require mobility on the part of the students, moving from job site to job site. The district hopes to survey welding students in the first completion cohort to find out where they went. This will be done through the welding teacher, who has stayed in contact with many of his former students.

**Program Review**

• Programs of study are reviewed annually. The reviews look at program completion, employment, industry certifications, and equipment/software needed (such as a welding software they are looking at purchasing). Administrators talk to instructors about challenges they face and to get an idea of barriers the students may be encountering to completion and what may be done to address these barriers.

**Definition of a POS**

• When asked to define a Program of Study, staff indicated that it is a well-defined structure, thorough and comprehensive, that prepares students to move into the workforce or to postsecondary education. A POS also meets the eight Perkins state standards and follows the FDOE curriculum frameworks.

**Perceptions of CTE in Region**

• Staff indicated that CTE is perceived positively in the region. Their student climate survey results support this assertion.

• The district has tried to promote CTE. GCSD administrators met with guidance counselors to train them to discuss CTE with students and their interests, particularly during course/school registration.
Promotion of CTE

- The district relies on guidance counselors to promote CTE programs to students. They also utilize field trips to local technical centers, reach out to parents through counselors, and sponsor a career day. They feel the need to offer more career exploration.

- An area cited by the district for improvement involves the participation of non-traditional students in CTE programs. Although students in the AOS program are more diverse, they have found it difficult to encourage women to take part in welding and agriculture, and in recruiting African American students to CTE in general. They have tried field trips to technical schools. They also considered bringing in special speakers but it is hard to decide who to bring in and the logistics of getting them in.

2016-2017 Action Plan to Address Challenges in Meeting Targets for Perkins Measure 5S1

Progress on Plan Implementation

- GCSD was involved in the Perkins Grant Technical Assistance for Program Improvement process during the 2016-2017 project year. During this technical assistance process, GCSD developed an Action Plan to addresses challenges in meeting the local target for Perkins Performance Measure 5S1.

- The district reports that progress has been made in implementation of their Action Plan:
  - The advisory committee has been established and has met. A CTE Advisory Council Handbook was developed (copy forwarded to staff in FSI).
  - Written policies were developed regarding CTE industry certifications (copy forwarded to FSI).
  - Guidance counselors have received the proposed training (training package forwarded to FSI).
  - Passing rates on certification exams have improved.
  - The district purchased three computers and software to assist students with learning trade terms, and discussions were held with the instructor.
  - Changes have been made to instruction in the welding and carpentry programs. Previously, the instructor for welding had been emphasizing hands-on skills because he felt that is what employers are most interested in. Students progressed through the book alone and at their own pace. There is now an effort to synchronize student reading so that students are pacing together. Different levels of students in the same class limited whole group instruction. Now there is a greater balance between the book and hands-on work. Additionally, a paraprofessional was hired to assist in improving reading skills.

Helpfulness of Perkins Grant Technical Assistance for Program Improvement Process

- Staff on the call felt that this targeted technical assistance was helpful to them, as new staff, to look at the CTE programs in place in their district and address issues.

- As new staff, they felt they would have benefited from more training on the Perkins Performance Measures themselves and what they represent. They struggled with understanding the numerators and denominators for the measures. FSI staff recommended that they try the online training modules on Perkins Performance Measures developed by staff and referred them to the appendix in the 2017-2018 Implementation Guide for links to the modules. Also, it was suggested that they try to attend any of the data training meetings offered through the Division and to attend data-related sessions at the annual Florida Association for Career and Technical Education (FACTE) conference.

- GCSD staff on the call also requested information on development of culinary arts programs and were referred to the Division’s state supervisor over those programs, Anne Nyman.
XIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

ADULT EDUCATION
2. Corrective Action Plan – GCSD is not required to complete an AE Corrective Action Plan.

IX. SUMMARY

Once the fieldwork is completed, including receipt of requested information when applicable, a preliminary report is forwarded to the provider for review. Comments are accepted and considered at the discretion of the FDOE Quality Assurance and Compliance section. 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: http://fldoe.org/academics/career-adult-edu/compliance.

Finally, the division issues a closure notice to the agency head and designated contact person. This notice indicates that all outstanding resolution items have been completed when applicable or that no further action is required.

On behalf of the department, the monitoring team extends our appreciation to all participants in the GCSD onsite monitoring visit. Special thanks is offered to Ms. Lori Price for her participation and leadership during this process.
# APPENDIX A

Gulf 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: **GULF COUNTY DISTRICT SCHOOL BOARD**  
Program type: **CTE**  
Target Year: **2015-2016**  
Monitoring Year: **2017-2018**

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**AGENCY RISK SCORE:**  **200**

*Data sources used for calculations: Prior to July 1, 2016*
## Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants

Agency Name: GULF COUNTY DISTRICT SCHOOL BOARD  
Program type: AE  
Target Year: **2015-2016**  
Monitoring Year: **2017-2018**

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<th>Scaling</th>
<th>Point Value</th>
<th>Points Assigned</th>
<th>Weight</th>
<th>Total Metric Points</th>
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</table>

**Agency Risk Score** 144

*Data sources used for calculations: Prior to July 1, 2016*
APPENDIX B

Gulf County School District
Resolution Action Plan

<table>
<thead>
<tr>
<th>Finding(s)</th>
<th>Corrective Action(s)</th>
<th>Agency Response</th>
<th>Person Responsible</th>
<th>Projected Date of Completion</th>
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</thead>
<tbody>
<tr>
<td>Finding B1: The provider failed to accurately report student data in FY 2015-16 (UGG 2 CFR 200.328 Monitoring and reporting program performance, F.S. 1008.43 Career program reporting requirements). After review of the records, it was determined that GCSD awarded two students OCPs in Carpentry but both students failed to complete all of the required courses for attainment of the reported OCP. This resulted in incorrect student data reports being submitted to FDOE.</td>
<td>Corrective Action B1: GCSD is required to conduct a training session utilizing resource modules created by FDOE data staff. The training modules to be utilized for the district training include: Reporting OCPs Training - Secondary and Reporting OCPs - Postsecondary. The training will cover the areas of how to recognize and award completion points and how to validate student data. Once the district completes their training session, they will be required to create and/or update their policies and procedures manual on how to identify, award and submit student OCP attainment. This manual will serve as a learning tool for all current and incoming data personnel and CTE teachers.</td>
<td>Gulf County School District is in agreement with finding B1 in which students were erroneously awarded OCPs in Carpentry. After communicating with Michael Swift and the FDOE training team, Gulf District Schools has agreed to have all persons responsible for entering student OCPs (guidance counselors, MIS executive Asst., CTE Director, and Asst. Supt. of Instruction) participate in a data training. DOE has advised that the best course of action would be to utilize the professional development training modules that are located on the FDOE website. This will be scheduled upon receipt of the training materials from DOE.</td>
<td>Lori Price, Assistant Supt. for Instruction</td>
<td>May 31, 2018</td>
</tr>
</tbody>
</table>

Plan submitted by (name and title): Lori Price, Assistant Superintendent for Instruction
Date: 4/10/2018

Plan accepted by: Michael Swift
Date: 4/13/2018

Status of Action Plan (to be completed by FDOE staff): Ongoing