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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 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 School Board of Highlands County (SBHC) was determined to be an onsite visit. Notification was sent to Dr. Brenda Longshore, superintendent, School Board of Highlands County on November 17, 2017. The designated representative for the agency was Mrs. Jessica Thayer, assistant superintendent of secondary programs, curriculum and instruction, School Board of Highlands County.

The onsite visit to the agency was conducted May 7, 2018 through May 9, 2018. The two representatives of the division present during the visit were program specialists, Mr. Michael Swift and Mrs. Christine Walsh of the Quality Assurance and Compliance section.

V. SCHOOL BOARD OF HIGHLANDS COUNTY

ENROLLMENT:

Fiscal Year (FY) 2015-16
CTE (possible duplication at program level): Secondary – 5,975

The provider was awarded the following grants for FY’s 2015-16, 2016-17 and 2017-18:

| Finance | FY 2015-16 | Grant Number | Grant Amount | Unexpended |
|——— |——— |——— |——— |——— |
| Perkins CTE Secondary | 280-1616A-6CS01 | $157,760.00 | $116.97 |
| Perkins CTE Rural | 280-1616A-6CR01 | $73,361.00 | $818.43 |

| FY 2016-17 | Grant Number | Grant Amount | Unexpended |
|——— |——— |——— |——— |
| Perkins CTE Secondary | 280-1617A-7CS01 | $155,664.00 | $0.00 |
| Perkins CTE Rural | 280-1617A-7CR01 | $71,608.00 | $4,746.18 |

| FY 2017-18 | Grant Number | Grant Amount | Unexpended |
|——— |——— |——— |——— |
| Perkins CTE Secondary | 280-1618A-8CS01 | $185,395.00 | $N/A |
| Perkins CTE Rural | 280-1618A-8CR01 | $70,894.00 | $N/A |

Additional information about the provider may be found at the following web address:
http://www2.highlands.k12.fl.us/

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:
• SBHC district office

Entrance and Exit Conferences
The entrance conference for SBHC was conducted on May 7, 2018. The exit conference was conducted on May 9, 2018. The participants are listed below:

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<th>Name</th>
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<th>Exit Conference</th>
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<td>Rebekah Wills</td>
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<td>Michael Swift</td>
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<td>Christine Walsh</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 20 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 CTE program is managed by a dedicated group of individuals with a combined multitude of educational experience.
• There is a good working relationship with the district and their FDOE grant manager.
• The CTE program administrators have a good working relationship with the program sites within the district.
• Although the CTE management team is relatively new to their positions, they are working hard to close any gaps and deficiencies that may have been leftover by the previous CTE administrative staff.
• CTE staff participate in FDOE sponsored training events as well as professional development training offered by the district.

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.
• SBHC utilizes the Skyward system to input student attendance and grades.
• The district has detailed policies and procedures for data collection. There is a streamlined process for school data operators, teachers and administrative staff for the submission of student data to FDOE.
• SBHC has staff with specific duties and responsibilities for data collection, entry and verification. The district has internal controls that ensure each individual has access to only a specific part of the management information system (MIS) to prevent too many people being able to view sensitive student data.
• Student data sent to FDOE goes through a multi-tier review process prior to final submission to the state. A similar process is used for the reconciliation of any data errors reported from FDOE.

FINDING AND 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 data submitted to the monitoring staff, it was determined that School Board of Highlands County awarded occupational completion points to three students who did not complete all of the required courses in the FDOE Curriculum Frameworks. All student level data was made available to the FDOE monitoring staff upon request while onsite.
  o Corrective Action B1: SBHC 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 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 has a partnership with the Highlands Career Institute (HCI) at South Florida State College (SFSC). Students have the opportunity to choose from 11 different programs on the college campus, but they are still allowed to participate in all activities at their home high school.
• SBHC is looking to add two new programs that will meet the future employment needs of the local region; “logistics” and “911 dispatcher”
• Students enrolled in the dual enrollment (DE) program with SFSC are Test of Adult Basic Education (TABE) tested by college testing administrators, utilizing the college’s entrance requirements.
• The district has experienced a substantial increase in earned industry certifications over the past three years.
• The School district has a very good relationship with the local community. Individuals and businesses donate money and time to ensure that the needs of the students within the district are met when district resources may not be available to accommodate those needs.
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.

- SBHC made only one capitalized grant funded equipment purchase over the course of the past three school years.
- SBHC has a technology plan that includes policies on new equipment acquisition, equipment safety/storage and disposal of old inventory.
- Equipment is inventoried annually, and property valued at $1,000 or greater receives a numbered, inventory identification tag. The monitoring team reviewed the district’s inventory management system to ensure that it included all of the necessary information as required by federal law.

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.

- Sample advisory committee minutes, agendas and sign-in sheets
- Employee travel records
- 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
- Student records
- Memorandums of Understanding (MOUs) and articulation agreements
- Grant funded employees time and effort (T&E) reports
- District and program sponsored training and records – sign in sheets, agendas, etc.

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.

- SBHC has financial policies and procedures in place to ensure the efficient cash management of CTE and grants funds.
- The monitoring team reviewed T&E reports, purchase orders and travel documents and found these documents to be in accordance with district, state and federal policies.
- There are only three individuals with purchasing cards that are paid from the Perkins grant.
- All purchases, including P-card transactions, made with grant funds go through a multi-tiered approval process that begins with a request at the school level and must pass several reviews prior to a purchase order being issued.
The CTE program administrators have a good working relationship with the district finance department. Monthly and on-demand reports allow the CTE administrators to stay up to date on the current flow of Perkins federal grant dollars.

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.

- SBHC has numerous collaborations and MOUs within the local community. They often offer additional educational and job experience to students within the district. The SBHC list of partners include, but are not limited to:
  - Lykes Brothers Citrus Company
  - Lykes Brothers Cattle Company
  - Glisson’s Animal Supply
  - Florida Nursery Growers and Landscape Association
  - Highlands County Farm Bureau Board
  - Highlands Career Institute
  - South Florida State College
  - Heartland Career Source

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.

**Secondary Performance Indicators 2015-16**
- In 2015-16 the agency met or exceeded all secondary measures; therefore a PIP was not required.

J. **PROGRAMS OF STUDY:**

**Implementation of Programs of Study**
As part of the DCAE assistance process, all agencies selected for a monitoring visit each project year will receive special technical assistance on Programs of Study (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 SBHC, Cathy Hammond, Bruce Harrington, and Lee Chipps-Walton of the Federal and State Initiatives (FSI) section of the DCAE discussed via a conference call, submitted narrative and materials on POS with SBHC staff on May 8, 2018. A summary of the conference call discussion compiled by the FSI team appears below.

**Program of Study: Culinary Arts (secondary)/Commercial Food and Culinary Arts (PSAV) and Culinary Management (AS/AAS) (postsecondary)**

**Program Basics**
- There has been a strong ongoing demand by local businesses for trained culinary workers. Student enrollment is also strong. The Culinary Arts Program (CAP) currently has the third highest enrollment of SBHC’s CTE programs.
- The secondary CAP is on four district campuses – the HCI at SFSC and three high schools.

**Completion**
- Due to staffing limitations, the full series of CAP courses are not offered at all high school campuses. Additionally, many students do not start the program sequence until 10th grade,
thus limiting how many courses they can complete before graduation. As a result, enrollment for Culinary 1 and 2 is high, while that for Culinary 3 and 4 is comparably low. This reduces the numbers of concentrators and completers in the program. For example, in 2015-16, the district-wide enrollment for Culinary Arts was 357, while there were only 17-20 senior concentrators that same school year.

**Placement**
- Seventy percent of POS completers in 2015-16 went on to either postsecondary education or into the labor force. SBHC staff on the call were not sure if they were continuing into employment or further education related to their culinary program.

**Partnerships and Collaboration**

**Local Advisory Committees**
- While SBHC does not have a formal advisory board nor scheduled, formal advisory council meetings, CTE teachers and administrators frequently collaborate with industry advisors to make program decisions. Several area agencies support the CAP, including Heartland CareerSource and the regional Economic Development Council. Information gathered during these meetings influences program decisions.

**Partnerships with Local Businesses**
- One of the CAP high school teachers is also a restaurant and catering business owner. Students, as part of her classes, get experience working with her catering business.
- Many regional restaurants hire HCI’s CAP students.

**Secondary and Postsecondary Collaboration**
- The SBHC leases the building from SFSC that HCI operates within. Six staff run the HCI. Students take academic courses for a half day and then take a half day of CTE courses. SBHC provides transportation to the campus daily.
- Students in the HCI CAP program receive SFSC clock hour credit and high school elective credit. For example for Food Prep 1, students get clock hour credit and high school elective credit (weighted higher) and those credits would transfer to SFSC.

**Student Involvement in Career and Technical Student Organizations**
- Multiple schools within SBHC offer CAP students the opportunity to participate in the Family, Career and Community Leaders of America (FCCLA) student organization. Students, along with teachers, engage in FCCLA competitions and other activities to build career skills and reinforce content from the CAP curriculum framework.

**Programs of Study Overall**

**Program Basics**

**Program Development**
- Since their community is so small, POS usually begin with interests/needs identified by local businesses and then succeed or are closed, based on student interest.
- The district needs more teachers and paraprofessionals. Like many districts, SBHC reported having struggles with finding and providing professional development for qualified CTE teachers.

**Program Outcomes**
- SBHC staff on the call reported that 50% of HCI students move on to further education, often at SFSC.
• Factors hindering HCI students from continuing into postsecondary education include undocumented immigrant status, not applying for the Free Application for Federal Student Aid and thus being unable to afford further education, and not being able to meet college academic requirements. SBHC reported that many students attending HCI have grade point averages (GPAs) that range from 2.0 to 2.8.

• SBHC is taking several measures to increase the placement rate of students. They are looking to provide more assistance to students applying to college, increase the academic offerings at HCI (such as advanced placement (AP) and honors courses) to attract a greater diversity of students, and offer more intern/externships for POS.

Program Review Process
• The district is so small, the review process involves the CTE director sitting down with program administrators to review program offerings. The CTE director and the superintendent review the programs together with teachers. They look at successful programs and get input from CareerSource and the local economic council. They then make recommendations to administrators to make changes and changes are made as needed.

• One district administrator sits on local boards and speaks for the district and then brings back what is learned to advise program decisions.

Partnerships and Collaboration
Secondary and Postsecondary Collaboration
• SBHC staff on the call reported that they have a good relationship with SFSC. There are currently 11 programs offered at the HCI on the SFSC campus. Some programs are just for high school students and some have high school and adult students enrolled.

• SBHC anticipates that two new programs at HCI will be opening in 2018-19: 911 dispatch and logistics. These new programs will have dual enrollment.

• SBHC school counselors visit the SFSC campus to thoroughly understand CTE programs offered there so that they can convey that knowledge accurately to students they counsel.

Partnerships with Local Businesses
• SBHC offers many intern/externships across a number of programs. Students within the Agriculture Program help manage orange groves and animal barns. The aeronautics program is building an airplane and teaching students how to fly. SBHC reported that the Vet Tech program has internships that are yielding positive employer feedback and a high rate of student employment at the veterinarian offices at which they interned.

• SBHC works closely with agricultural businesses and these businesses have invested in the SBHC program infrastructure, such as installing a grove and lining grain silos with plastic.

• SBHC is working with local businesses and SFSC to start CTE programs in logistics and 911 dispatch. In addition, changes are being made to modify “shop” courses to help students gain construction and repair skills to meet the high demand for construction workers in the area.

Impact of Damage from Hurricane Irma on CTE Programs and Available Employment
• There is a huge demand for contract labor due to hurricane damage. Currently, students are not receiving enough training to meet the demand and SBHC is working on building their construction program to meet this demand.

• Agriculture in the county was also impacted by the storm. After crop damage, less fruit means fewer workers and harvesters are needed.

• One restaurant that has hired culinary arts students in the past has been closed for repairs. The closure of just one restaurant in their area can have a major impact on the local economy and available employment.
Definition of Program of Study

• SBHC staff on the call reported that POS are opportunities for students to learn a skill set from start to finish – from foundational skills all the way through being career ready. POS can lead directly from high school to employment or allow students to obtain multiple degrees, up through graduate school. How much schooling is appropriate will depend on the student, their interests, and their desired skill set. Whatever the level of training that SBHC students desire, SBHC will offer support to assist students in reaching their goals. SBHC wants to educate students to have them be able to stay in their community.

Promotion of CTE

• SBHC staff on the call felt that the district needs to do a better job of promoting CTE.
• HCI recruitment assemblies occur on high school campuses. These events involve promotional videos, printed materials, presentations, question and answer sessions, and student testimonials. These events are promoted by CTE teachers and school counselors.
• SBHC staff on the call reported that they are going to start mailing CTE materials directly to parents. In the past, students have not been reliable in sharing CTE materials with their parents.

Regional Perceptions of CTE

• SBHC staff reported that many parents are not aware of CTE programs or their benefits.
• SBHC wants to continue building partnerships so that community businesses feel like they can call when they need employees or to help employees acquire needed skills.

XIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION


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 SBHC onsite monitoring visit. Special thanks is offered to Ms. Jessica Thayer for her participation and leadership during this process.
**APPENDIX A**

School Board of Highlands County  
Career and Technical Education  
Risk Matrix

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

**Agency Name:** HIGHLANDS 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*
### APPENDIX B

**School Board of Highlands County**  
**Resolution Action Plan**

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<th>Finding(s)</th>
<th>Corrective Action(s)</th>
<th>Agency Response</th>
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<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 data submitted to the monitoring staff, it was determined that SBHC awarded occupational completion points to three students who did not complete all of the required courses in the FDOE Curriculum Frameworks. All student level data was made available to the FDOE monitoring staff upon request while onsite.</td>
<td>Corrective Action B1: SBHC 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>All CTE teachers received a training using the Secondary Reporting OCP – Training Module Powerpoint and the Secondary Reporting OCP Training Modula Narrative on May 16, 2018. Those participants that were not in attendance were trained individually by the CTE Lead Teacher. MIS trained data operators on how to enter the data in Skyward from the class rosters provided from the CTE teachers. All documentation for the training was send to DOE in the Google Share Folder.</td>
<td>Jessica Thayer, Rebekah Wills</td>
<td>May 25, 2018</td>
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**Plan submitted by (name and title):**  
Michael Swift, Program Specialist IV  
**Date:** 6/14/2018

**Plan accepted by:** Jessica Thayer, Assistant Superintendent of Secondary Programs  
**Date:** 6/25/2018

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

**Date:** 6/29/2018  
**Status of Plan Completion:** Complete