



FLORIDA DEPARTMENT OF  
**EDUCATION**  
CAREER AND ADULT EDUCATION

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

**Clay County School District**

**February 18-20, 2019**

**Final Report**

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Florida Department of Education  
Division of Career and Adult Education

**Clay County School District  
Adult Education and Career and Technical Education  
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 (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 2018-2019 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 2018-19 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 Clay County School District (CCSD) was determined to be an onsite visit. Notification was sent to Mr. Addison Davis, superintendent, Clay County School District on November 19, 2018. The designated representatives for the agency was Ms. Alice Paulk, supervisor, Career and Technical Education and Ms. Shannah Kosek, supervisor, Adult and Community Education.

The onsite visit to the agency was conducted February 18-20, 2019. The three representatives of the division present during the visit were Mrs. Christine Walsh, program specialist, Mr. Michael Swift, program specialist and Mr. Andrew Goldsmith, program specialist of the Quality Assurance and Compliance section.

**V. CLAY COUNTY SCHOOL DISTRICT**

**ENROLLMENT:**

Fiscal Year (FY) 2016-17

CTE (possible duplication at program level): Secondary – 15,256  
 AE: 849

The provider was awarded the following grants for FY’s 2016-17, 2017-18 and 2018-19:

**FY 2016-17**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Secondary	100-1617A-7CS01	\$ 263,191.00	\$ 3,099.36
Adult General Education	100-1917B-7CG01	\$ 211,258.00	\$ 17,722.86
English Literacy and Civics	100-1937B-7CE01	\$ 35,684.00	\$ 58.75

**FY 2017-18**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Secondary	100-1618A-8CS01	\$ 273,536.00	\$ 2,261.02
Adult General Education	100-1918B-8CG01	\$ 230,554.00	\$ 22,478.83
English Literacy and Civics	100-1938B-8CE01	\$ 33,234.00	\$ 10,223.03

**FY 2018-19**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Secondary	100-1619B-9CS01	\$ 282,803.00	\$ N/A
Adult General Education	100-1919B-9CG01	\$ 230,554.00	\$ N/A
English Literacy and Civics	100-1939B-9CE01	\$ 33,234.00	\$ N/A

Additional information about the provider may be found at the following web address:  
<https://www.oneclay.net/>

## 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:

- Ridgeview High School
- Middleburg High School
- Clay High School

### Entrance and Exit Conferences

The entrance conference for CCSD was conducted on February 18, 2019. The exit conference was conducted on February 20, 2019. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Shannah Kosek	Supervisor, Adult and Community Education	X	X
Peggy Brooks	Technology and Data Specialist	X	X
Kelly Mosley	CTE Supervisor, Community and Business Partnerships	X	X
Alice Paulk	Supervisor, Career and Technical Education	X	X
Terry Connor	Assistant Superintendent		X
Theresa Lynette Shaw	Testing Specialist		X
Catherine Malinda	Bookkeeper		X
<b>FDOE Monitoring Team</b>			
Michael Swift	Program Specialist, QAC, FDOE	X	X
Christine Walsh	Program Specialist, QAC, FDOE	X	X
Andrew Goldsmith	Program Specialist, QAC, FDOE	X	X

### 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.
- At the program level each supervisor takes a hands-on approach in the management of their particular program area. The CTE and AE supervisors are closely involved with operations such as financial management and tracking of grant funds, program review and oversight, and program relationships with the local community.
  - The CTE department has a position whose specific job function is dedicated to community and business partnerships.
  - CCSD offers opportunities for professional development. CTE and AE administrators, instructors and data staff participate in training as required by their program area.
  - The CTE and AE supervisors have a very good working relationship with their FDOE appointed grant manager.
- 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.
- CCSD utilizes the Focus® system to input student registration, attendance and grades.
  - The Focus® system is in place for the collection, verification and submission of student data to FDOE.
  - The district has a data entry training with Focus® and uses the FDOE Database handbook as a guide for the database submissions and data element information.
  - CTE and AE student data (program completers, non-completers and industry certifications) were verified during the course of the visit.
  - The district utilizes student and program data for review and improvement. They also use data when considering the expansion or reduction of program and course offerings.
  - All Test of Adult Basic Education (TABE) and Comprehensive Adult Student Assessment System (CASAS) certifications were up to date as required by FDOE and each testing company. There are also multiple internal controls in place for protection against unauthorized access to testing materials and supplies.
  - Reporting errors are reviewed regularly during the Full Time Equivalent (FTE) survey submissions and during the end of year FTE survey 5 submission for CTE. The data for the adult programs is reviewed regularly during the adult education data reporting survey windows.

### FINDINGS AND ACTIONS

- Finding B1: The provider failed to accurately report student data in FY 2016-17 (UGG 2 CFR 200.328 Monitoring and reporting program performance and F.S. 1008.43 Career program reporting requirements.) After review of the data submitted to the monitoring staff, it was determined that the CCSD awarded an occupational completion point to a student who did not complete all of the required courses laid out in the FDOE Curriculum Frameworks. All CTE student level data was made available to the FDOE monitoring staff upon request while onsite.
  - Corrective Action B1: CCSD 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 Occupational Completion Points (OCPs) Secondary and can be found at: <http://www.fldoe.org/academics/career-adult-edu/professional-dev.stml>. 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 submit a written summary on how to identify, award and submit student OCP attainment. An email memo is to be sent to the FDOE monitor attesting the training, along with the written summary and a list of those who participated in the training.

- Finding B2: The provider failed to accurately report student data in FY 2016-17 (UGG 2 CFR 200.328 Monitoring and reporting program performance). After review of the data submitted to the monitoring staff, it was determined that the CCSD did not award a literacy completion point (LCP) for two students who had actually earned an LCP. All AE student level data was made available to the FDOE monitoring staff upon request while onsite.
  - Corrective Action B2: CCSD 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 Initial Functioning Level and Reporting Literacy Completion Points (ABE); and Reporting Initial Educational Functioning Level and Reporting of LCPs (ESOL and ELCATE), the modules can be found at: <http://www.fldoe.org/academics/career-adult-edu/professional-dev.stml>. 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 submit a written summary on how to identify, award and submit student LCP attainment. An email memo is to be sent to the FDOE monitor attesting to the training, along with the written summary as well as a list of those who participated in the training.

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

- High school juniors and seniors participate in career shadowing events in March of each year.
- CCSD is rebranding the Academy of Early Childhood Education to the Academy of Teaching and Learning. This strategy is being used to try to increase program enrollment as well as increase the number of non-traditional students.
- CCSD CTE has a reputation within the community. However, they are still fighting an up-hill battle regarding awareness. To try to remedy this issue, they provide community tours of their programs, visit the local rotary clubs and have an annual CTE program showcase. The AE programs are also well received, but the community awareness could be improved.
- The Center for Adult and Community Education also offers Post Secondary Adult Vocational (PSAV) classes in Certified Nursing Assistant (CNA), Phlebotomy and 911 Dispatch. The district has affiliation agreements that provide opportunities for job training and internships at the secondary and postsecondary level.
- The program advisory boards serve a pivotal role in the development and enhancement of the CTE programs. The information shared by the boards allow these programs to obtain equipment and materials that meet industry standards.
- CTE and AE administrators, as well as the program area teachers, try to stay abreast of classroom performance to ensure students stay on track to achieve their goals.

**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 has policies and procedures on new equipment acquisition, equipment safety/storage, disposal of old inventory and lost/stolen equipment.
- Equipment is inventoried annually, and property valued at \$1,000 or greater receives a numbered inventory identification tag. The district's inventory management system includes all of the necessary information as required by federal law.
- There have been no instances of missing or stolen equipment purchased with Perkins funds.
- The district uses the Business Plus® software for inventory purposes. The system electronically tracks inventory from the time an item is approved for purchase all the way through its useful life.
- CCSD requires that any technology purchases receive the approval of the district IT department.
- Technology and equipment is up to date and is being used specifically for CTE programs. The technology is integrated into the curriculum as required per program.

**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 850-245-0511.

**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
- District procurement/purchasing records
- District policies and procedures for finance, procurement, inventory and equipment
- Data entry instruction guide
- Student and employee handbooks
- Program promotional material
- Student records
- Verification of student Industry Certifications and OCP attainment
- Internal control policies
- Policies on dual enrollment
- Articulation agreements
- Grant-funded employees' Time and Effort (T&E) reports
- Inventory records for all grant-funded equipment purchases
- District Website



**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.

- CCSD has financial policies and procedures in place to ensure efficient cash management, budgeting, documentation and reporting of CTE and AE grant funds.
- The finance system is currently in a conversion process from TERMS® to Business Plus®. This has presented the district with some challenges and they are addressing the issues as they arise. The district hopes to have the transition complete by the end of the 2018-19 fiscal year.
- CCSD uses grant funds to pay for travel. Therefore, employee travel was reviewed and found to be in compliance with the UGG and FDOE Green Book.
- All purchases made with CTE and AE 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 approval and a purchase order being issued.
- Business Plus® affords the supervisors with access to real time reports of all grant expenditures.
- During the review of the Final Project Disbursement Reports, (DOE 399 and 499), for projects 100-1617A-7CS01, 100-1618A-8CS01, 100-1917B-7CG01, 100-1918B-8CG01 and 100-1938B-8CE01 large discrepancies were noted between the final DOE 399 or 499 and the original grant budget including any amendments.
- While reviewing the T&E for grant-funded employees, the monitoring team noticed that the semi-annual time certification was signed but not dated by either the employee or the supervisor as required by the UGG and Green Book.

#### FINDINGS AND ACTION

- Finding G1: During the review, it was noted that the Final Project Disbursement Reports for CTE and AE were not consistent with the original grant budget. The addition of unapproved object codes and the reallocation of funds between object codes is in violation of the UGG 200.308(b) Revision of budget and program plan, UGG 200.331(2) Requirements for pass-through entities, the FDOE Green Book section B, Reason for Amendment and the RFA for all years regarding equipment purchases.
  - The following funds were moved between object codes without an amendment:
    - Project 100-1617A-7CS01: line item 5300-644, had an actual approved budget of \$49,000.00 and the district spent \$88,353.03; over spending the line item by \$39,353.03. Project 100-1618A-8CS01: line item 5300-644, had an approved budget of \$49,000.00 and \$121,907.39 was spent; over spending the line item by \$72,907.39. After review of the purchase orders it was determined that the items purchased were allowable and no repayment is required.
  - The following object codes were added without an amendment:
    - Project 100-1617A-7CS01: line items 5300-334 (\$700.00), 5300-630 (\$366.99) and 5300-641 (\$1,577.71). In project 100-1618A-8CS01: line items 5300-334 (\$800.00), 5300-369 (\$3,765.00), 5300-519 (\$95.37), 5300-649 (\$1,289.55) and 7800-360 (\$15,970.32) were added. In project 100-1918B-8CG01 line items 5400-369 (\$5,400.00), 6300-130 (\$1,001.00), 6300-210 (\$79.28), 6300-220 (\$76.59) and 6300-240 (\$10.47) were added. In project 100-1938B-8CE01: line items 6100-210 (\$15.77) and 6100-240 (\$8.33) were added. After review of documentation provided by the district, it was determined that these expenditures were allowable with the exception of line items added in project 100-1938B-8CE01. There isn't a salary

assigned to function 6100 and these benefits were incorrectly assigned. These benefits total \$24.10 and will need to be repaid.

- Corrective Action G1: CCSD is required to work with their FDOE project manager to make sure all budget expenditures for the current year 2018-19 are approved and any budget revisions are supported by an approved amendment. CCSD will also need to craft a procedure that provides a method of checks and balances to ensure that the amendment moves through the appropriate approval and finance pathway and is submitted to FDOE. A copy of the procedure is to be forwarded to the compliance monitor. CCSD is also required to repay the \$24.10 expended for benefits to a salary that was not included in the grant or added by an approved amendment. Completion of these tasks will satisfy this finding.
- Finding G2: The agency failed to accurately report time and effort for a grant funded employee. Semi-annual T&E certifications were signed but not dated. After review of the districts documentation supporting this employee it was determined that the T&E reported for this employee was allowable. This is in violation of UGG 200.430: Compensation-personnel services; Project Application and Amendment Procedures for Federal and State Programs - Section C-19: Personnel Cost - Time Distribution.
  - Corrective Action G2: Submit a signed copy of the next semi-annual certification for all employees whose salary is paid 100% from the Adult Education grant.

**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.

- CCSD has several collaborations and MOUs within the local community. They often offer additional educational and job experiences to students within the district. The list of partners include, but are not limited to:
  - Vystar Credit Union
  - Orange Park Medical Center
  - St. Vincent's Healthcare
  - Northeast Florida Builders Association
  - Clay County Sheriff's Office
  - ACE Mentoring
  - Pragmatic Works
  - Vac-Con
  - Coastal Spine and Pain Center
  - Clay County Farm Bureau

**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 2016-17**

In 2016-17 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 CCSD, 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 CCSD staff on February 19, 2019. A summary of the conference call discussion compiled by the FSI team appears below.

### **Program of Study: Allied Health Assisting**

#### Program Identification

- When making decisions regarding which programs to offer, the District consults local businesses, postsecondary partners, and their local workforce development board. The most common way these parties give input is through their advisory board. The District also determines program offerings through consulting the Department of Economic Opportunity's labor market data, analyzing the skill set of current teachers, and reviewing input through a yearly parent and student survey.
- The Allied Health Assisting program has been operating for 4 school years. The enrollment in 2016-17 was 128 students. The enrollment for 2018-19 is 124 students.

#### Program Leadership, Design, and Review

- The District governs their CTE programs using multiple advisory boards. The one overseeing their Allied Health Assisting program has jurisdiction over Medical, Early Childhood, & Culinary Arts programs (MECCA). The Board is composed of District staff, CTE teachers, St. Johns River State College, Career Source of Northeast Florida, and a number of local businesses.
- The meetings for MECCA occur 3-4 times a year (with one meeting a year dedicated to training board members on their role and board processes).
- Primary topics of discussion for these meetings are business skill and certification needs, educational resource needs, work-based learning, and guest speaking opportunities.
- An example of Advisory Board feedback that influenced the District's decisions: The hospitals on the Board indicated a need for more EKG techs. This feedback resulted in one school switching their program focus and certification to EKG. The District also offers the Certified Nursing Assistant (CNA) certification, which is particularly valuable to local nursing homes.
- In addition to the Advisory Boards in 2016-17, the District had Professional Learning Communities (PLCs) that met weekly at schools during school hours for teachers, counselors, and administrators to discuss curriculum and academic integration. These PLCs are still active but meet once a month instead of weekly.
- The teachers conduct extensive curriculum mapping. The District pulled teachers from their normal teaching schedule and provided substitute teachers for their classrooms so that teachers could develop these maps. All the health science teachers with the District came together to collaborate on curriculum maps for the health science programs.

#### Business Partners

- The District has strong relationships with local hospitals and nursing homes. These partnerships provide clinical and career shadowing opportunities, equipment, student background checks, flu shots, TB testing and mock interviewing, etc.

#### Secondary/Postsecondary Alignment

- The District takes students to visit the campus of St. Johns River State College (SJRSC).

- They offer two visits per year in which the high school seniors visit the health science programs offered at SJRSC.
- This helps with recruitment as well as forms relationships between secondary and postsecondary that facilitate program alignment. At these field trips, the students get to do multiple hands-on skill labs.
- Curriculum alignment primarily happens through the Advisory Board. The District also attends the SJRSC advisory meetings and secondary/postsecondary alignment processes also take place there.

#### Dual Enrollment

- The District recently started a dual enrollment initiative for the Emergency Medical Services program at SJRSC.
- Students participate at the end of their school day.
- Four students this year with hope to expand next year.
- The students are all from different schools and must provide their own transportation as district policy does not allow for school transportation for dual enrollment.

#### Promotion

- Eighth grade students in the District receive multiple opportunities for college and career counseling through counselors visiting middle schools to help students determine high school class scheduling for the coming school year.
- High schools within the District host a yearly open house for rising freshmen that promotes CTE offerings.

#### Work-based Learning Opportunities

- Teachers work closely with hospitals and nursing homes to get a schedule for work-based learning. The district provides transportation as a group to these opportunities.
- Students of the Allied Health Assisting program coordinate with a local blood bank to organize blood drives at local high schools. At these events, these students also are responsible for taking the vital signs of potential donors.

#### Instructor Qualifications

- All instructors for the POS that come from the industry are RNs, and are issued District CTE certifications.
- The district utilizes FACTE resources to get the necessary teacher training.
- Many of their Health Sciences teachers come from local school nurse or other nursing positions.

#### Challenges

- The District is experiencing a teacher shortage. The district notes that CTE teachers seem harder to come by during good economic times.
- They would like to receive more access to professional development for their teachers, including integration of math and reading into CTE.

## **VIII. REQUIRED RESOLUTION ACTIVITIES**

### **CAREER AND TECHNICAL EDUCATION**

1. Resolution Action Plan – CCSD is required to complete a CTE Resolution Action Plan.

### **ADULT EDUCATION**

1. Resolution Action Plan – CCSD is required to complete an AE Resolution 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 CCSD onsite monitoring visit. Special thanks is offered to Ms. Alice Paulk and Ms. Shannah Kosek for their participation and leadership during this process.

**APPENDIX A**

Clay County School District  
Career and Technical Education  
Risk Matrix

<b>Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants</b>					
Agency Name: <b>CLAY COUNTY DISTRICT SCHOOL BOARD</b>					
Program type: <b>CTE</b>					
Target Year: <b>2016-2017</b>					
Monitoring Year: <b>2018-2019</b>					
<b>Metric</b>	<b>Scaling</b>	<b>Point Value</b>	<b>Points Assigned</b>	<b>Weight</b>	<b>Total Metric Points</b>
<b>Number of Years Since Last Monitored</b>	7 or More Years	7	<b>7</b>	<u><b>X 10</b></u>	<b>70</b>
	5-6	5			
	3-4	3			
	0-2	1			
<b>Total Budget for all Perkins Grants Combined</b>	Upper Quartile	7	<b>5</b>	<u><b>X8</b></u>	<b>40</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Perkins Grants</b>	4 or More	7	<b>1</b>	<u><b>X 8</b></u>	<b>8</b>
	3	5			
	2	3			
	1	1			
<b>3-year Perkins Improvement Plan (PIP) Index</b>	7.50 – 10.00	7	<b>0</b>	<u><b>X 6</b></u>	<b>0</b>
	5.00 – 7.49	5			
	2.50 – 4.99	3			
	0<index<2.50	1			
	0	0			
<b>Change in Management Information Systems (MIS) from Previous Fiscal Year</b>	Yes	7	<b>0</b>	<u><b>X 6</b></u>	<b>0</b>
	No	0			
<b>Agency CTE Program Director Change from Previous Fiscal Year</b>	Yes	7	<b>0</b>	<u><b>X 6</b></u>	<b>0</b>
	No	0			
<b>Unexpended Funds from all Perkins Grants Combined</b>	Upper Quartile	7	<b>3</b>	<u><b>X 4</b></u>	<b>12</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Number of Findings from the Office of the Auditor General</b>	Upper Quartile	7	<b>7</b>	<u><b>X 4</b></u>	<b>28</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>AGENCY RISK SCORE:</b>					<b>158</b>

**APPENDIX A**

Clay County School District  
Adult Education  
Risk Matrix

<b>Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants</b>					
Agency Name: <b>CLAY COUNTY DISTRICT SCHOOL BOARD</b>					
Program type: <b>AE</b>					
Target Year: <b>2016-2017</b>					
Monitoring Year: <b>2018-2019</b>					
<b>Metric</b>	<b>Scaling</b>	<b>Point Value</b>	<b>Points Assigned</b>	<b>Weight</b>	<b>Total Metric Points</b>
<b>Number of Years Since Last Monitored</b>	7 or More Years	7	<b>7</b>	<u><b>X10</b></u>	<b>70</b>
	5-6	5			
	3-4	3			
	0-2	1			
<b>Total Budget for all Adult Education Grants Combined</b>	Upper Quartile	7	<b>5</b>	<u><b>X 8</b></u>	<b>40</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Adult Education Grants</b>	4 or More	7	<b>3</b>	<u><b>X 8</b></u>	<b>24</b>
	3	5			
	2	3			
	1	1			
<b>Change in Management Information Systems (MIS) from Previous Fiscal Year</b>	Yes	7	<b>0</b>	<u><b>X 6</b></u>	<b>0</b>
	No	0			
<b>Change in Adult Education Program Director from Previous Fiscal Year</b>	Yes	7	<b>0</b>	<u><b>X 6</b></u>	<b>0</b>
	No	0			
<b>Adult Education Performance Targets</b>	Upper Quartile	7	<b>5</b>	<u><b>X 4</b></u>	<b>20</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Unexpended Funds from all Adult Education Grants Combined</b>	Upper Quartile	7	<b>5</b>	<u><b>X 4</b></u>	<b>20</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Number of Findings from the Office of the Auditor General</b>	Upper Quartile	7	<b>7</b>	<u><b>X 4</b></u>	<b>28</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Agency Risk Score</b>					<b>202</b>

**APPENDIX B**

Clay County School District  
Resolution Action Plan

Findings	Corrective Actions	Agency Response	Person Responsible	Projected Date of Completion
<p>Finding B1 The provider failed to accurately report student data in FY 2016-17 (UGG 2 CFR 200.328 Monitoring and reporting program performance and F.S. 1008.43 Career program reporting requirements). After review of the data submitted to the monitoring staff, it was determined that the CCSD awarded an occupational completion point to a student who did not complete all of the required courses laid out in the FDOE Curriculum Frameworks. All CTE student level data was made available to the FDOE monitoring staff upon request while onsite.</p>	<p>Corrective Action B1: CCSD 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 Occupational Completion Points (OCPs) Secondary and can be found at <a href="http://www.fldoe.org/academics/career-adult-edu/professional-dev.stml">http://www.fldoe.org/academics/career-adult-edu/professional-dev.stml</a> 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 submit a written summary on how to identify, award and submit student OCP attainment. An email memo is to be sent to the FDOE monitor attesting to the training, along with the written summary as well as a list of those who participated in the training.</p>	<p>The CTE Dept. will complete the OCP Training module provided by FLDOE and provide a written summary of the information learned. Harry Jackson, Information Technology Dept. will also be invited to participate as he loads the information into FOCUS, which is then reported to FLDOE.</p>	<p>Alice Paulk- CTE Dept. Kelly Mosley- CTE Dept. Harry Jackson- IT Dept.</p>	<p>July 31, 2019 (before Survey 5 is uploaded to FLDOE)</p>
<p>Finding B2: The provider failed to accurately report student data in FY 2016-17 (UGG 2 CFR 200.328 Monitoring and reporting program performance). After review of the data submitted to the monitoring staff, it was determined that the CCSD did not award a literacy completion point (LCP) to two students</p>	<p>Corrective Action B2: CCSD 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 Initial Functioning Level and</p>	<p>The ACE staff is scheduled is scheduled to attend the required training consisting of: Reporting initial Functioning Level and Reporting Literacy Completion Points (LCP's) for ABE and Reporting Initial Educational</p>	<p>Shannah Kosek, Supervisor, Adult &amp; Community Education</p>	<p>May 5, 2019</p>



Findings	Corrective Actions	Agency Response	Person Responsible	Projected Date of Completion
<p>who had actually earned an LCP. All AE student level data was made available to the FDOE monitoring staff upon request while onsite..</p>	<p>Reporting Literacy Completion Points (ABE) and Reporting Initial Educational Functioning Level and Reporting of LCPs (ESOL and ELCATE) the modules can be found at <a href="http://www.fldoe.org/academics/career-adult-edu/professional-dev.stml">http://www.fldoe.org/academics/career-adult-edu/professional-dev.stml</a>. 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 submit a written summary on how to identify, award and submit student LCP attainment. An email memo is to be sent to the FDOE monitor attesting to the training, along with the written summary as well as a list of those who participated in the training.</p>	<p>Functioning Level and Reporting of LCP's (ESOL ad ELCATE) on May 3, 2019 Attendees will include: Shannah Kosek, Peggy Brooks, Theresa Shaw and Shelley McKisick. Peggy Brooks will submit a written summary to the FLDOE monitoring team no later than May 15, 2019.</p>	<p>Peggy Brooks, Database Specialist, Adult &amp; Community Education</p>	
<p>Finding G1: During the review, it was noted that the Final Project Disbursement Reports for CTE and AE were not consistent with the original grant budget. The addition of unapproved object codes and the reallocation of funds between object codes is in violation of the UGG 200.308(b) Revision of budget and program plan, UGG 200.331(2) Requirements for pass-through entities, the FDOE Green Book section B, Reason for Amendment and the RFA for all years regarding equipment purchases.</p> <ul style="list-style-type: none"> <li>o The following funds were moved between object</li> </ul>	<p>Corrective Action G1: CCSD is required to work with their FDOE project manager to make sure all budget expenditures for the current year 2018-19 are approved and any budget revisions are supported by an approved amendment. CCSD will also need to craft a procedure that provides a method of checks and balances to ensure that the amendment moves through the appropriate approval and finance pathway and is submitted to FDOE. A copy of the procedure is to be forwarded to the compliance monitor.</p>	<p>Clay County School District is currently working to revise policies and procedures in order to comply with the rules established in the Uniform Grant Guidance and the FDOE Green Book. The anticipated completion date for these revisions is June 30, 2019.</p> <p>The Quality Assurance and Compliance Onsite Monitoring Visit found that in project 100-1938B-8CE01 (Adult Civics Education –</p>	<p>Dr. Susan Legutko, Asst. Superintendent for Business Affairs</p> <p>Dr. Susan Legutko, Asst. Superintendent for Business Affairs</p>	<p>June 30, 2019 (Anticipated)</p> <p>April 17, 2019</p>

Findings	Corrective Actions	Agency Response	Person Responsible	Projected Date of Completion
<p>codes without an amendment:</p> <ul style="list-style-type: none"> <li>▪ Project 100-1617A-7CS01: line item 5300-644, had an actual approved budget of \$49,000.00 and the district spent \$88,353.03; over spending the line item by \$39,353.03.</li> <li>Project 100-1618A-8CS01: line item 5300-644, had an approved budget of \$49,000.00 and \$121,907.39 was spent; over spending the line item by \$72,907.39. After review of the purchase orders it was determined that the items purchased were allowable and no repayment is required.</li> <li>○ The following object codes were added without an amendment: <ul style="list-style-type: none"> <li>▪ Project 100-1617A-7CS01: line items 5300-334 (\$700.00), 5300-630 (\$366.99) and 5300-641 (\$1,577.71). In project 100-1618A-8CS01: line items 5300-334 (\$800.00), 5300-369 (\$3,765.00), 5300-519 (\$95.37), 5300-649 (\$1,289.55) and 7800-360 (\$15,970.32) were added. In project 100-1918B-8CG01 line items 5400-369 (\$5,400.00), 6300-130 (\$1,001.00), 6300-210 (\$79.28), 6300-220 (\$76.59) and 6300-240 (\$10.47) were added. In project 100-1938B-8CE01: line items 6100-210 (\$15.77) and 6100-</li> </ul> </li> </ul>	<p>CCSD is also required to repay the \$24.10 expended for benefits to a salary that was not included in the grant or added by an approved amendment. Completion of these tasks will satisfy this finding.</p>	<p>Grant 4600) line items 6100-210 (\$15.77) and 6100-240 (\$8.33) were expended for benefits to a salary that was not included in the grant or added by an approved amendment. Thus, \$24.10 represents questioned costs, and the district must repay the \$24.10.</p> <p>To accomplish the restoration of \$24.10 for questioned costs, district personnel reduced the amount received by the District from Adult Civics Education Federal grant for indirect expense, which are charged at the rate approved by the Florida Department of Education. The attached journal entry from the Business Plus accounting system reflects a reduction of indirect expenses charged to fund 420 (Special Revenue Fund) and Grant 4600 (100-1938B Adult Civics Education). Thus, the district believes corrective measures have been taken to restore the questioned costs of \$24.10 to the program.</p>		

Findings	Corrective Actions	Agency Response	Person Responsible	Projected Date of Completion
<p>240 (\$8.33) were added. After review of documentation provided by the district, it was determined that these expenditures were allowable with the exception of line items added in project 100-1938B-8CE01. There isn't a salary assigned to function 6100 and these benefits were incorrectly assigned. These benefits total \$24.10 and will need to be repaid.</p> <p>Finding G2: The agency failed to accurately report time and effort for a grant funded employee. Semi-annual T&amp;E certifications were signed but not dated. This is in violation of UGG 200.430: Compensation-personnel services; Project Application and Amendment Procedures for Federal and State Programs - Section C-19: Personnel Cost - Time Distribution.</p>	<p>Corrective Action G2: Submit a signed copy of the next semi-annual certification for all employees whose salary is paid 100% from the Adult Education grant.</p>	<p>The next semi-annual certifications are due June 28, 2019. Shannah Kosek will submit the signed and dated certifications to the FDOE monitor on June 28, 2019.</p>	<p>Shannah Kosek, Supervisor of Adult &amp; Community Education</p>	<p>June 28, 2019</p>
<p><b>Plan submitted by (name and title): Shannah Kosek, Supervisor of Adult &amp; Community Education and Alice Paulk, CTE Supervisor</b> <b>Date: July 1, 2019</b></p>				
<p><b>Plan accepted by: Christine Walsh</b> <b>Date: July 10, 2019</b></p>				
<p><b>Status of Action Plan (to be completed by FDOE staff):</b></p>				

## ATTACHMENT A

### Clay County School District

#### *Career and Technical Education Highlights - Secondary Programs*

- 2,225 industry certifications earned in 2017-2018
- 36 different CTE programs
- 120 Clay County CTE Teachers
- 240 juniors and seniors participating in Career Shadowing
- 244 Juniors attended SJRSC's Clay Career Day
- 17 CTE Advisory Boards
- CTE 2018-2019 Highlights
  - Coastal Spine and Pain Center CTE Student Scholarships \$20,000
  - Host Community Tours Each Semester
  - Pre-Apprenticeship Program with NEFBA for trades programs
  - SJRSC Emergency Medical Responder Dual Enrollment program
  - Garber Auto Mall After-School Program
  - Expanded Citi Bank Women in IT program in JHs
  - CHS Criminal Justice National Career Academy Coalition (NCAC) Model Academy Review – April
- CTE Moving Forward 2019-2020
  - Pre-Apprenticeship Program with Electrical Training Alliance Jax at OHS
  - Cyber Security Program at RHS
  - Rebranding RHS Academy of Teaching and Learning
  - Ford Automotive Career Exploration (A.C.E.) Program
  - 4th VyStar Credit Union opening at Clay High School

#### **A few of our key Business Partners:**

- VyStar Credit Union
- Northeast Florida Builders Association
- Haskell
- Auld and White Constructors
- Thomas May Construction
- Clay County Sheriff's Office
- Garber Auto Mall
- ACE (Architecture, Construction, and Engineering) Mentoring
- Alliance and Associates
- Coastal Spine and Pain Center/Family Medical Centers
- Electrical Training Alliance
- Miller Electric Company

- WW Gay Mechanical Contractors
- Clary and Associates
- Vac-Con
- Clay County Farm Bureau
- Clay County Agricultural Fair
- Orange Park Medical Center
- St. Vincents Medical Center

### *Adult and Community Education Highlights*

#### **ACE Program Highlights**

- Currently has 40 total employees; 32 instructors (28 part-time and 4 full-time)
- Expanded class sites to now offer a total of 8 locations within Clay County; 2 Secondary Education Certified teachers per location to cover Math/Science and Reading, Language Arts/Social Studies
- Currently 1222 ABE/GED/ESOL students are enrolled; up from 1072 in 17'-18'
- ESOL instructional hours have increased by 18% since 17'-18', showing us that students are staying in classes longer and allowing us to post-test sooner and more often
- PSAV program enrollment is up 36% in 18'-19' compared to 17'-18' with a 100% completion rate for all programs (911 Dispatch, Certified Nursing Assistant, and Phlebotomy).
- Career Pathways Committee Members have grown to include multiple new organizations/businesses in 18'-19' such as: Clay Economic Development Corp., Kid's First of Clay, Clay Behavioral Health, Women's Empowerment Services of NE Florida, and Northeast Florida Community Action Agency.
- Orientation is now given to ALL of our ABE/GED students, regardless of day or night classes, to positively impact retention and ensure registration and testing uniformity.
- We administer approximately 1150 assessments through our Pearson Vue Testing Lab annually; 775 are GED assessments.

#### **ACE's Goal for 2019-2020**

- Expand PSAV programs to include Computer Business Programming, Computer Systems and Information Technology and Welding.
- Build new partnerships with St. Vincent's Medical Center (articulation agreement currently being discussed), HarborChase Independent & Assisted Living Memory Care, and Pragmatic Works (IT careers) and possibly the Department of Transportation (Welding and other construction careers)
- Incorporate orientation to all ESOL students
- Expand testing options to include ASVAB and 911 Dispatcher Certification exam
- Expand on partnership with Clay County School District guidance counselors and senior teachers to offer PSAV options to graduating seniors
- Continue to increase Career Pathways Committee members

#### **Partnership Highlights**

- **Alterius Career College** donated enough furniture and equipment so that we can eventually start a Pharmacy Technician program. We were also able to fully stock our CNA and Phlebotomy labs with necessary supplies.

- **St. Johns River State College** granted application fee waivers for our students entering their institution.
- **Orange Park Medical Center, Signature Healthcare, Putnam, Clay and St. John's Sheriff's Offices** currently offer our students job shadowing and employment opportunities.
- **Northeast Florida Community Action Agency, CareerSource and Women's Empowerment Services** assisted students with GED and PSAV tuition and testing costs.
- Received numerous donations from local businesses (**Outback Steakhouse, Loop Pizzeria, New Vision Cinemas, TGI Friday's, Chili's, Books-A-Million, etc.**) to reward and motivate current ABE/GED and ESOL students by way of coupons, gift cards, etc.
- Held multiple college/career fairs and guest speaker events that included: **NEFBA, Publix, Walgreens, Exit Realty, SJRSC, American Academy of Cosmetology, Alterius, CDA Welding School, Orange Park Medical Center, Family Lifecare, ERC, Community First Bank, Alterius and multiple military branches**

### **Top Partnerships**

- **Education:** St. Johns River State College, American Academy of Cosmetology, FSCJ, CDA Technical Institute, NEFBA, Clay County District Schools, and previously Alterius (local campus now closed)
- **Employers:** Orange Park Medical Center, Signature Healthcare, Putnam, Clay and St. John's Sheriff's Offices, ERC, CareerSource
- **Non-Profit Organizations:** Northeast Florida Community Action Agency, Women's Empowerment Services of NE Florida, Quigley House, Clay Safety Net Alliance, Clay County Literacy Coalition
- **Other:** Community First Bank, Family Lifecare, Clay Economic Development, and the U.S. Army