



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

College of Central Florida

March 4-6, 2020

Final Report

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Florida Department of Education
Division of Career and Adult Education

**College of Central Florida
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) Strengthening Career and Technical Education for the 21st Century Act, 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 2019-2020 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 2019-20 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 QAC 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 College of Central Florida (CCF) was determined to be an onsite visit. Notification was sent to Dr. James D. Henningsen, president, College of Central Florida on December 17, 2019. The designated representatives for the agency were Dr. Rob Wolf, dean, Business, Technology and Career and Technical Education and Ms. Leah Gamble, manager, Instructional Services.

The onsite visit to the agency was conducted on March 4-6, 2020. The three representatives of the division present during the visit were program specialists Mr. Andrew Goldsmith, Ms. Christine Walsh and Ms. Kara Kearce, director of QAC.

V. COLLEGE OF CENTRAL FLORIDA

ENROLLMENT:

Fiscal Year (FY) 2017-18

- CTE (possible duplication at program level): Postsecondary – 2,619

The provider was awarded the following grants for FY’s 2017-18, 2018-19 and 2019-20:

Finance

FY 2017-18

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Postsecondary	422-1618A-8CP01	\$ 449,215.00	\$ 22,220.15
Perkins Rural	422-1618A-8CR01	\$ 27,198.00	\$ 5,415.19
Perkins Leadership	422-1628A-8CPD1	\$ 275,000.00	\$ 1,079.56
Adult General Education	422-1918B-8CG01	\$ 55,668.00	\$ 4,748.49
Adult General Education	422-1918B-8CG02	\$ 104,454.90	\$ 8,121.81

FY 2018-19

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Postsecondary	422-1619B-9CP01	\$ 462,768.00	\$ 12,042.01
Perkins Rural	422-1619B-9CR01	\$ 27,200.00	\$ 5,418.06
Perkins Leadership	422-1629A-9CPD1	\$ 275,000.00	\$ 8,522.48
Adult General Education	422-1919B-9CG01	\$ 55,668.00	\$ 5,420.84
Adult General Education	422-1919B-9CG02	\$ 104,454.00	\$ 8,741.00

FY 2019-20

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Postsecondary	422-1610B-0CP01	\$ 449,452.00	\$ N/A
Perkins Rural	422-1610B-0CR01	\$ 27,893.00	\$ N/A

Adult General Education	422-1910B-0CG01	\$ 55,668.00	\$ N/A
Adult General Education	422-1910B-0CG02	\$ 104,454.00	\$ N/A

* FY 2019-20 final project disbursement reports will not be available until the end of the program year. Additional information about the provider may be found at the following web address:

<https://www.CF.edu/>

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:

- CCF Main campus, Ocala
- CCF Adult Education campus, Chiefland

Entrance and Exit Conferences

The entrance conference for CCF was conducted on March 4, 2020. The exit conference was conducted on March 6, 2020. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Rob Wolf	Dean, Business, Technology and Career and Technical Education	X	X
Leah Gamble	Manager of Instructional Services	X	X
Bonnie Hays	Coordinator of Business and Technology	X	X
Arlene Chauncey	Perkins Specialist	X	X
FDOE Monitoring Team			
Andrew Goldsmith	Program Specialist, QAC, FDOE	X	X
Christine Walsh	Program Specialist, QAC, FDOE	X	X
Kara Kearce	Director, 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.

- The CTE staff for CCF was well prepared and organized.
- The CTE programs and AE programs worked independently in the past but are making efforts to cooperate and coordinate going forward.
- AE reports that their CareerSource partners have been inefficient at reaching out to students and supporting their programs.
- CCF is working on pilot programs to incorporate AE and CTE programs. The Department recommends creating pathways for AE students to enter CTE programs.
- The CTE department is currently preparing for the submission of their Comprehensive Local Needs Assessment (CLNA) that is required for Perkins V.
- Both CTE and AE note a lack of funds available to sufficiently provide students with technology and instruction as needs evolve.

FINDING AND ACTION

- Finding A1: The provider failed to complete time and effort reports for grant-funded positions. An employee did not sign their time and effort report. This is in violation of the FDOE Greenbook section C-19 and 2 C.F.R. 200, UGG §200.430.
 - Required Action A1: CCF is to submit a time and effort report for March 2020 to FDOE monitoring staff to ensure time and effort reporting is accurate and correct.

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.

- The college uses Jenzabar software for their student data and management information system.
- There is a multi-tiered review and verification process that takes place prior to submitting student data to FDOE.
- CCF utilizes Syntactically Awesome Style Sheets (SASS) programs to verify that data is valid.
- CCF reports that tight timelines for reporting windows can be challenging.
- CCF student data was reviewed for accuracy.
- CCF student information being collected and reported to the Department was reviewed for accuracy and completeness. It was discovered that a required data element had not been collected and reported to FDOE. Technical assistance was provided on site to ensure compliance going forward.
- Literacy Completion Points (LCP's) were reported by hand. This was found to be an inaccurate method of reporting. Technical assistance was provided to ensure accurate scoring and reporting moving forward.

FINDING AND ACTION

- Finding B1: The provider failed to accurately report student data in FY 2017-18. This is in violation of UGG 2 CFR 200.328 "Monitoring and reporting program performance."
 - Required Action B1: CCF has been provided technical assistance to accurately report student data moving forward. CCF is to submit to the FDOE monitor a statement which includes actions being taken to ensure student data is reported accurately going forward.

- Finding B2: The provider failed to accurately report student data in FY 2017-18 and FY 2018-19. This is in violation of UGG 2 CFR 200.328 “Monitoring and reporting program performance.”
 - Required Action B2: CCF is required to update the data collection field for the Withdrawal Reason in their data system, to include the table values for Data Element Number 2021 - AGE Withdrawal Reason. Once the data collection field is updated CCF will provide a screen print showing the inclusion of the required table values.

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

- Advisory boards meet twice per year. Program managers at CCF lead the meetings and help recruit active members.
- Local businesses are involved with meetings and are enthusiastic about programs.
- The advisory councils make recommendations including requests for teaching soft skills and Excel proficiency.
- Technical assistance was provided to expand apprenticeship options with emphasis on entrepreneurial and soft skills.
- Programs have institutional program review every three years. Dr. Wolf works on creating these reviews to evaluate if the program is viable and successful.
- External stakeholders will review programs and prior objectives to see where programs have been successful or not and make changes accordingly.
- CCF utilizes the SWOT strategy: strengths, weaknesses, opportunities and threats.
- Dr. Wolf will present reports to the college president on the state of the programs and recommended changes.

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.

- All equipment over \$1000 is tagged by CCF staff and recorded in their inventory management system.
- Technical assistance was provided recommending roaming transfer of property forms and sign out sheets for equipment that is often moved from its designated location.
- No equipment was reported lost or stolen.
- Equipment is located in areas designated for CTE use. No equipment was used for unauthorized purposes.

FINDING AND ACTION

- Finding D1: During the monitoring review several pieces of equipment were not in the location indicated on the inventory record. This is in violation of 2 C.F.R 200, UGG §200.313
 - Required Action D1: Equipment purchased with grant funds must be properly tagged with an asset identification number and kept in the location listed in the inventory management system in order to comply with state and federal requirements. CCF will submit updated inventory records that include correct locations for all pieces of grant funded equipment.

- 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 (OEEEO) is responsible for monitoring and overseeing civil rights compliance obligations. Should you have any questions or concerns, please contact the OEEEO 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.
- CTE quality assurance and compliance protocols
 - Advisory committee minutes, agendas and sign-in sheets
 - College procurement/purchasing records
 - Grant funded travel records
 - College policies and procedures for finance and procurement
 - Equipment transfer of property records
 - Student and employee handbooks
 - Policies and procedures on inventory/equipment management
 - Student data records
 - Internal control policies
 - Memorandums of Understanding (MOUs) and articulation agreements
 - Grant-funded employee time and effort (T&E) reports
 - Inventory records for all grant funded equipment purchases
- 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 grant manager and grant management section staff review equipment requests. CCF has dedicated inventory management staff to ensure proper management and tracking of equipment.
 - Purchasing cards were used to purchase items. Those purchases were reviewed for compliance.
 - Technical assistance was provided to ensure understanding and compliance of the concept supplement vs supplant.
 - Equipment is purchased early in the fiscal year to allow students to benefit from its use.
 - CCF has strong internal controls and policies on spending grant funds.
 - Technical assistance was provided on how to effectively spend grant funds so there are little remaining funds available at the end of a fiscal year.
 - Purchase orders were reviewed for compliance.

FINDING AND ACTION

- Finding G1: During review of the protocol questions and interviews it was determined that unallowable purchases were made. Souvenirs were purchased with Perkins funds and distributed at an expo. This is in violation of 2 C.F.R. 200, UGG §200.421.
 - Required Action G1: The provider is required to complete an internal financial adjustment and payback with nonfederal funds with the Department's Comptroller's

office. The unallowable items include: Cell phone wallets (\$995.07), keyrings (\$236.19), decals (\$159.60), paddles (\$444.15) and additional paddles (\$1,256.65). The provider will contact the Department's Comptroller's office and arrange for the repayment and resubmittal of DOE 399's.

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.

- CCF has numerous collaborations and MOUs within the local region. They often offer additional educational and job experiences to students within the college. The list of partners includes, but are not limited to:
 - CareerSource (Florida Crown) (Citrus Levy Marion)
 - AdventHealth
 - Ocala Health
 - Citrus Memorial Hospital
 - Ocala/Marion County Chamber and Economic Partnership
 - Marion County Public Schools
 - Citrus County Public Schools
 - Levy County Public Schools
 - Ocala Royale Dames for Cancer Research Inc.
 - United Way of Marion County
 - Marion County Veterans Coalition
 - Mid-Florida Regional Manufacturers Association
 - Marion County Health Department
 - Ocala Municipal Arts Commission

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Required Action Plan – CCF is required to complete a CTE Corrective Action Plan.
2. Required Action Plan – CCF is required to complete an AE Corrective Action Plan.

IX. SUMMARY

Once the fieldwork is completed, including receipt of additional requested information when applicable, a preliminary report is forwarded to the provider for review. Comments are accepted and will be considered at the discretion of the FDOE monitoring team lead. Once the final report is approved, it will be forwarded to the agency head along with a copy to the provider's designated contact person. The final report will be posted on the department's website at the following address:

<http://fldoe.org/academics/career-adult-edu/compliance>.

Finally, the division issues a closure letter to the agency head and designated contact person. This letter indicates that all outstanding resolution items have been completed, when applicable, and that no further action is required. This letter will officially end your monitoring process.

On behalf of the department, the monitoring team extends its appreciation to all participants in the CCF onsite monitoring visit. Special thanks is offered to Dr. Rob Wolf and Ms. Leah Gamble for their participation and leadership during this process.

APPENDIX A

College of Central Florida
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Colleges Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: College of Central Florida					
Program Type: CTE					
Target Year: 2017-2018					
Monitoring Year: 2019-2020					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	3	<u>X 10</u>	30
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	5	<u>X 8</u>	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	5	<u>X 8</u>	40
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	5	<u>X 4</u>	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	7	<u>X 4</u>	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					158

Data sources used for calculations: Prior to July 1, 2018

College of Central Florida
Adult Education
Risk Matrix

Risk Scores Matrix for Colleges Receiving Adult Education (AE) Grants					
Agency Name: College of Central Florida					
Program Type: AE					
Target Year: 2017-2018					
Monitoring Year: 2019-2020					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	3	<u>X10</u>	30
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	1	<u>X 8</u>	8
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	3	<u>X 8</u>	24
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Agency AE Program Director Change from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	5	<u>X 4</u>	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	7	<u>X 4</u>	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Adult Education Program Improvement Plan (AEPiP)	Target Not Met on 3 of 3 Indicators	5	1	<u>X 6</u>	6
	Target Not Met on 2 of 3 Indicators	3			
	Target Not Met on 1 of 3 Indicators	1			
	All Targets Met	0			
Agency Risk Score					116

Data sources used for calculations: Prior to July 1, 2018

APPENDIX B

College of Central Florida
Resolution Action Plan

Finding	Corrective Action	Agency Response	Projected Date of Completion
Finding A1: The provider failed to complete time and effort reports for grant-funded positions. An employee did not sign their time and effort report. This is in violation of the FDOE Greenbook section C-19 and 2 C.F.R. 200, UGG §200.430.	Required Action A1: CCF is to submit a time and effort report for March 2020 to FDOE monitoring staff to ensure time and effort reporting is accurate and correct.	The College of Central Florida has updated its time and effort report for grant-funded positions that includes required employee signatures.	6/15/2020
Finding B1: The provider failed to accurately report student data in FY 2017-18. This is in violation of UGG 2 CFR 200.328 “Monitoring and reporting program performance.”	Required Action B1: CCF has been provided technical assistance to accurately report student data moving forward. CCF is to submit to the FDOE monitor a statement which includes actions being taken to ensure student data is reported accurately going forward.	The College of Central Florida acknowledges this violation. Since it has been provided the technical assistance to accurately report the student data, going forward the data will be reported accurately based on ABE or GED completions.	6/15/2020
Finding B2: The provider failed to accurately report student data in FY 2017-18 and FY 2018-19. This is in violation of UGG 2 CFR 200.328 “Monitoring and reporting program performance.”	Required Action B2: CCF is required to update the data collection field for the Withdrawal Reason in their data system, to include the table values for Data Element Number 2021 - AGE Withdrawal Reason. Once the data collection field is updated CCF will provide a screen print showing the inclusion of the required table values.	A data element has been added in Jenzabar, the college’s front-line system, which includes the following elements: B ~ AE, MED Treatment; C ~ AE, Deceased; D ~ AE, Military Duty 90+ days; E ~ AE, Foster Program; F ~ AE, Non-attendance; G ~ AE, Other; N ~ AE, Enrolled in NRS Program; Z ~ AE, Not enrolled in NRS Program. A screenshot of this update is provided in an attached document.	6/15/2020
Finding D1: During the monitoring review several pieces of equipment were not in the location indicated on the inventory record. This is in violation of 2 C.F.R 200, UGG §200.313	Required Action D1: Equipment purchased with grant funds must be properly tagged with an asset identification number and kept in the location listed in the inventory management system in order to comply with state and federal requirements. CCF will submit updated inventory records that include correct locations for all pieces of grant funded equipment.	All Perkins-funded equipment was accounted for in the audit. The equipment in question was being utilized by employees on campus at various locations. Therefore, the college has developed a sign-out sheet at the location indicated on the inventory record in order to more effectively monitor its location at all times.	6/15/2020

<p>Finding G1: During review of the protocol questions and interviews it was determined that unallowable purchases were made. Souvenirs were purchased with Perkins funds and distributed at an expo. This is in violation of 2 C.F.R. 200, UGG §200.421.</p>	<p>Required Action G1: The provider is required to complete an internal financial adjustment and payback with nonfederal funds with the Department's Comptroller's office. The unallowable items include: Cell phone wallets (\$995.07), keyrings (\$236.19), decals (\$159.60), paddles (\$444.15) and additional paddles (\$1,256.65). The provider will contact the Department's Comptroller's office and arrange for the repayment and resubmittal of DOE 399's.</p>	<p>The Dean of Business, Technology and Career and Technical Education has contacted the college's Associate Vice President of Finance to arrange with the Florida Department of Education to transfer the payback of unallowable funds itemized in the Corrective Action column. Once the process is identified, the college will arrange the repayment of funds.</p>	<p>6/30/20</p>
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<p>Plan submitted by (name and title): Rob Wolf, Ph.D., Dean of Business, Technology and Career and Technical Education, College of Central Florida Date: 6/18/20</p> <p>Plan accepted by: Andrew Goldsmith Date: 6/25/2020</p> <p>Status of Action Plan (to be completed by FDOE staff): All corrective action items completed</p>
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