



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Nassau County School District

October 23 – 25, 2019

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Nassau County School District
Career and Technical Education and Adult 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 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 Nassau County School District (NCS D) was determined to be an onsite visit. Notification was sent to Dr. Kathy K. Burns, superintendent, Nassau County School District on August 7, 2019. The designated representative for the agency was Mr. Brent Lemond, director, Career and Adult Education.

The onsite visit to the agency was conducted October 23 – 25, 2019. The two representatives of the division present during the visit were program specialists Mr. Andrew Goldsmith and Mr. Michael Swift of the Quality Assurance and Compliance section.

V. NASSAU COUNTY SCHOOL DISTRICT

ENROLLMENT:

Fiscal Year (FY) 2017-18

CTE (possible duplication at program level): Secondary – 4,932

Adult Basic Education – 375

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>
Adult General Education	450-1918B-8CG01	\$ 108,341.00	\$ 39.14
Adult Education - Corrections	450-1918B-8CC01	\$ 87,624.00	\$ 27,437.96
Perkins CTE Secondary	450-1618A-8CS01	\$ 88,654.00	\$ 0.00
Perkins Rural	450-1618A-8CR01	\$ 61,202.00	\$ 0.00

FY 2018-19*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	450-1919B-9CG01	\$ 108,341.00	\$ 0.00
Adult Education - Corrections	450-1919B-9CC01	\$ 87,624.00	\$ 30,392.09
Perkins CTE Secondary	450-1619B-9CS01	\$ 98,836.00	\$ 0.00
Perkins Rural	450-1619B-9CR01	\$ 61,637.00	\$ 0.00

FY 2019-20*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	450-1910B-0CG01	\$ 108,341.00	\$ N/A *
Adult Education - Corrections	450-1910B-0CC01	\$ 87,624.00	\$ N/A *
Perkins CTE Secondary	450-1610A-0CS01	\$ 93,850.00	\$ N/A *
Perkins Rural	450-1610B-0CR01	\$ 64,850.00	\$ N/A *

*FY 2019-20 project disbursement reports not yet available

Additional information about the provider may be found at the following web address:

<https://www.nassau.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:

- Nassau County School District – Florida State College at Jacksonville - Nassau Campus
- West Nassau High School
- Fernandina Beach High School
- Yulee High School
- Hilliard High School

Entrance and Exit Conferences

The entrance conference for NCSD was conducted on October 23, 2019. The exit conference was conducted on October 25, 2019. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Brent Lemond	Director, CTE and AE	X	X
Chris Lacambra	Director, Business Systems	X	
Kelly Bonewit	CTE/AE Staff		X
Angela Cole	AE Program Specialist		X
Edward Wilcox	Data Entry Specialist		X
Patricia Young	CTE/AE Staff		X
FDOE Monitoring Team			
Michael Swift	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.

- NCS D has a single grant manager for both Adult Education and CTE grants.
- The grant manager works with the curriculum and financial staff to create grant applications and amendments.
- No amendments have been denied and NCS D has worked with the Department to ensure correct amendments.
- NCS D reports a good relationship with their CareerSource partner, CareerSource Northeast Florida.
- One of the collaborative efforts between NCS D and CareerSource Northeast Florida includes a “reverse” job fair where students are engaged with the local workforce; allowing for networking opportunities.
- There are efforts made at the administrative level to connect CTE, AE and internal workforce systems to find opportunities to students between programs.

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 district utilizes Focus® software for the collection and review of student data.
- Student data is entered into their system by hand. There are reviews of the data before it is sent to the Department.
- Edit reports from the Department are reviewed by staff for corrective actions.
- They offer AE testing opportunities twice a week.
- The district was aware of some data reporting issues in the past that had been identified and corrected since then.

FINDING AND ACTION

- Finding B1: The provider failed to accurately report student data in FY 2017-18 (UGG 2 CFR 200.328 Monitoring and reporting program performance; Florida Statute (F.S.) 1008.43 Career program reporting requirements). After review of student data provided to the monitoring staff, it was determined that NCS D had one instance of erroneously reported student data. NCS D had issued a student an occupational completion point (OCP) when that student had not completed the require course (Digital Information Tech).
 - Required Action B1: CTE and AE administration and data entry staff are to review the Secondary CTE and AE Training Modules found at: <http://www.fldoe.org/academics/career-adult-edu/professional-dev.stml> and send a memo to the FDOE team lead attesting that the modules have been reviewed and a signed list of NCS D staff who have reviewed them.

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

- Upon review of AE class scheduling it was identified that insufficient hours were being made available to AE students in corrections institutions. NCS D has reported that it is challenging offering these courses because of the unique situation in which the students are in.
- A unique challenge for their corrections facilities is that male and female students may not be in the same class together. This makes it additionally difficult to schedule and attend classes regularly.

- Another challenge is that there is a district-wide benefit for a student to receive advanced placement course completion credit and CTE completion credit. Because of the limited number of courses a student may attend, there is some competition between AP course offerings and CTE offerings.
- The district sees apprenticeship opportunities for students as being a focus going forward.
- NCSd reports that advisory council feedback is helpful while Florida Education & Training Placement Information Program (FETPIP) reports are not.

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.

- Equipment is purchased as early in the grant year as possible to utilize that equipment efficiently.
- Each school has their own property manager who inventories equipment.
- There was no lost or stolen equipment reported.

FINDING AND ACTION

- Finding D1: Three inventory items, “Basic Geri w/Case”, at \$1,613 each were not tagged. This is in violation of 2 C.F.R 200, UGG §200.313.
 - Required Action D1: Inventory must be tagged appropriately and provide supporting documentation.

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.

- District procurement/purchasing records
- Employee travel records
- District policies and procedures for finance and procurement
- Data resource manual
- District technology plan
- Student and employee handbooks
- Policies and procedures on inventory/equipment management
- Student data records
- Internal control policies
- Policies on dual enrollment
- 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.
- 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 district's DOE399 and DOE499 project disbursement reports were reviewed for accuracy and congruence with the grants.
- The district uses the FDOE Redbook and Greenbook for guidance on purchasing and financial management.
- The district utilizes Skyward® software for most of their administrative needs from procurement records, student records, curriculum, data and more.
- NCS D does not use purchasing cards.
- Because most of the funding is for salary it is easy to track the flow of grant expenditures throughout the year.
- Technical assistance was provided to ensure spending reports that are sent to the Department are correct.
- CTSO and Advisory council activities are supported with Perkins funding.

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.

- CareerSource Northeast Florida
- Nassau County Sheriff's Office
- Florida State College of Jacksonville

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Required Action Plan – NCS D is required to complete a Resolution Action Plan.

ADULT EDUCATION

2. Required Action Plan – NCS D is required to complete a 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 NCS D onsite monitoring visit. Special thanks is offered to Mr. Brent Lemond for his participation and leadership during this process.

APPENDIX A

Nassau County School District
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: Nassau Co School Board					
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	7	<u>X 10</u>	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	3	<u>X8</u>	24
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins 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 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	0	<u>X 4</u>	0
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					130

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

Agency Name: Nassau Co School Board

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	7	<u>X10</u>	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	3	<u>X 8</u>	24
	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	3	<u>X 4</u>	12
	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	3	<u>X 6</u>	18
	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					168

APPENDIX B

Nassau County School District Required Action Plan

Finding	Corrective Action	Agency Response	Projected Date of Completion
<p>Finding B1: The provider failed to accurately report student data in FY 2017-18 (UGG 2 CFR 200.328 Monitoring and reporting program performance; Florida Statute (F.S.) 1008.43 Career program reporting requirements). After review of student data provided to the monitoring staff, it was determined that NCS D had one instance of erroneously reported student data. NCS D had issued a student an occupational completion point (OCP) when that student had not completed the require course (Digital Information Tech).</p>	<p>Required Action B1: CTE and AE administration and data entry staff are to review the Secondary CTE and AE Training Modules found at: http://www.fldoe.org/academics/career-adult-edu/professional-dev.stml and send a memo to the FDOE team lead attesting that the modules have been reviewed and a signed list of NCS D staff who have reviewed them.</p>	<p>After researching the specifics of this student, it was learned that the instructor correctly submitted documentation related to OCPs, and the school’s data entry operator entered the information as submitted. The instructor certified the student’s OCP because the student passed the course. However, during the 2017-18 school year, the district’s attendance policy required that the student be procedurally failed. The district’s attendance policy has since been revised and students are no longer procedurally failed. The district will ensure that all appropriate faculty and staff will review the training module and submit a memo to the DOE.</p>	<p>1/31/2020</p>
<p>Finding D1: Three inventory items, “Basic Geri w/Case” at \$1,613 each, were not tagged. This is in violation of 2 C.F.R 200, UGG §200.313.</p>	<p>Required Action D1: Inventory must be tagged appropriately and provide supporting documentation.</p>	<p>The instructor stated that the inventory tags had not been applied because she worried it would have been lost when students practice bathing skills. Since the audit, the property stickers have been applied to a more concealed area of the manikins. Further, the property ID number has been written on the manikins using permanent ink.</p>	<p>12/12/2019</p>