



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

**Quality Assurance and Compliance
Virtual Desk Monitoring Review
for
Adult Education and Career and Technical Education**

Bradford County School District

May 10 – 24, 2021

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Bradford 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) 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 2020-21 Core Monitoring Guide, which is still under review.

III. QUALITY ASSURANCE CORE MONITORING GUIDE

The Quality Assurance Policies, Procedures and Protocols manual was discontinued after the 2019-20 program year. The Quality Assurance and Compliance section will now operate from the Core Monitoring Guide (CMG). The guide provides a summary of each Core Activity and objective of the monitoring design and process.

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 Bradford County School District (BCSD) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Will Hartley, superintendent, Bradford County School District on December 1, 2020. The designated representative for the agency was Mr. Brad Bishop.

The representative of the division conducting the VDMR was program specialist Mr. Orion Price of the Quality Assurance and Compliance section.

V. BRADFORD COUNTY SCHOOL DISTRICT

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 1,845
 AE: 93

The provider was awarded the following grants for FY's 2018-19, 2019-20 and 2020-21:

Finance*

FY 2018-19

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	040-1919B-9CG01	\$ 95,148.00	\$ 18,620.60
Perkins Secondary	040-1619B-9CS01	\$ 47,198.00	\$ 5,188.41
Perkins Rural	040-1619B-9CR01	\$ 35,673.00	\$ 25,846.04

FY 2019-20*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	040-1910B-0CG01	\$ 95,148.00	\$ 0.00
Perkins Secondary	040-1610B-0CS01	\$ 50,227.00	\$ 16,487.53
Perkins Rural	040-1610B-0CR01	\$ 22,119.00	\$ 21,225.19

FY 2020-21*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	040-1911B-1CG01	\$ 95,148.00	\$ N/A
Perkins Secondary	040-1611B-1CS01	\$ 52,613.00	\$ N/A
Perkins Rural	040-1611B-1CR01	\$ 42,494.00	\$ N/A

* Final project disbursement reports not available at the time of this writing.

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

<https://www.bradfordschools.org/Page/1>

VI. MONITORING ACTIVITIES

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

Onsite Visits

No onsite visits were made during the VDMR process.

Entrance and Exit Conferences

An introductory teleconference for BCSD was conducted on May 10, 2021. The exit teleconference was conducted on May 24, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Brad Bishop	Director AE & CTE	X	X
FDOE Monitoring Team			
Orion Price	Program Specialist, QAC, FDOE	X	X
Charles Davis	Program Specialist, QAC, FDOE	X	

Interviews

BCSD administrators were available via teleconference for interviews, if necessary.

Records Review

Program, financial and administrative records were reviewed. A complete list is provided in section VII, item F. 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 and AE grants for BCSD are managed by the CTE and AE director, Brad Bishop.
- BCSD has established policies and procedures required with all approval processes before submitting any grant application to FDOE.
- The AE and CTE director work in conjunction with his financial director, superintendent, advisory committees and district finance staff. The aforementioned group discusses the needs of the programs. All needs discussed are included in the grant applications reviewed and approved by Superintendent Will Hartley before being submitted to the FDOE.
- Once the FDOE approves the grant submitted, the AE and CTE grants are tracked through Skyward® which allows the financial director, CTE and AE director to work together and track expenditures during monthly meetings.
- The comprehensive local needs assessment (CLNA) included in the BCSD Perkins grants required consultation within the community and local business leaders. These stakeholders include teachers, community leaders and other educational specialists.
- BCSD offers ample opportunities for district-wide training and professional development. AE and CTE administrative staff participate in annual conferences within their program areas. At the same time, FDOE sponsored training events and webinars such as the Florida Association for Career and Technical Education (FACTE) and the Workforce Educational District Data Advisory Council (WEDDAC) conferences are attended.
- BCSD has a recruiting team that attends the Northeast Florida Education Consortium (NEFEC) and leans on the recruiting team to develop new CTE instructors and create a career fair booth to find new

employees. District also allows instructors to use experience to supplement degrees or certifications to get larger salaries at the beginning of employment with the district.

B. DATA AND ASSESSMENT: refers to all the components of the data and assessment system, including test administration, test security, data collection and entry and reporting, as well as procedures. The use of data in program decision-making is also explored and commented upon.

- BCSD utilizes the Focus® system for the student information system (SIS) and Skyward® for the management information system (MIS).
- Training are provided to staff for the National Reporting System requirements (AE only), data collection procedures, data entry and all other areas of the MIS. Administrative staff also participate in FDOE trainings annually and upon hiring.
- All of the data elements required of their local MIS were included in the MIS system screenshots and verified during the VDMR.
- Registration forms (digital and paper) include the student "release of information" clauses required by the Family Educational Rights and Privacy Act (FERPA). District registration forms were uploaded as evidence that included the statement.
- Program staff verifies student data prior to the records being uploaded to the SIS. Data is then manually entered within the SIS to ensure accuracy prior to submission to the state.
- The district has internal controls that ensure each individual has access to a specific part of the MIS needed to complete tasks to prevent too many people from being able to view sensitive student data. This also acts as a check and balance for accuracy when imputing data into the system.
- Samples of AE and CTE student data were reviewed and verified for accuracy as part of the VDMR. BCSD provided all student records requested, and all student records were correctly entered.

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

- CTE students have the opportunity to participate in multiple Career and Technical Student Organizations (CTSO), internships and other work-based learning.
- They refer to disabled students as exceptional and have a comprehensive policy and procedure to identify and cater to needs based on disability. Once the student self identifies during registration the school keeps forms on file from the students' professional care giver stating the disability. No reasonable services and accommodations are denied to those students who self-declared a disability.
- AE instructors are trained to incorporate CTE skills and related content into daily classroom instruction.
- The district has a memorandum of understanding (MOU) with CareerSource North Florida to provide career services and training for students.
- BCSD has a dual enrollment articulation agreement with the local college, North Florida Technical College. They submitted the Dual Enrollment Articulation Agreement as the evidence for the college that breaks down requirements for students to participate.
- Tests of adult basic education (TABE) are used for student skill level assessment. All TABE test proctors are certified as required by FDOE and the testing companies.

- 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 inventory criteria set forth by EDGAR and the UGG is included within the inventory management system. The inventory management system was verified during the VDMR.
 - Photographic evidence of inventory was reviewed as part of the VDMR process.
 - The district has a technology plan that includes policies on new equipment requests, equipment safety/storage and disposal of old inventory.
 - There have been no reports of stolen or lost equipment over the previous three fiscal years.
- 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.
- Size, scope and quality review
 - CLNA
 - MIS data quality checklists
 - District policies and procedures for finance and procurement
 - District technology plan
 - Student and employee handbooks
 - Inventory records
 - Procurement records
 - Memorandums of Understanding (MOUs) and articulation agreements
 - Advisory committee records – agendas, sign in sheets, etc.
 - District professional development and training records – agendas, sign in sheets, training materials, etc.
 - AE and CTE student data review
- 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.
- BCSD has multiple financial policies and procedures to follow that ensure the efficient management of CTE and AE grant funds that filter through multiple school board members.
 - Mr. Bishop is the main point of contact that filters information from the teachers needing supplies all the way to the superintendent. This helps with the writing of the grants to ensure that all needs are met.
 - BCSD uses the Skyward® MIS data system to track all expenditures driven through budgets. Spreadsheets are utilized to track the progression of spending under each category to ensure spending is on track for end-of-year finalization on the Project Disbursement Report (DOE399) and Project Disbursement Report (DOE499) reports to be submitted to the FDOE.
 - The district has detailed and thorough procedures for procuring equipment and inventory funded by its federal grants. All purchases must receive final approval from the district Board of Directors and superintendent before being finalized and sent to the DOE.
 - Program directors and administrative staff meet monthly to review expenditure reports and to determine a grant's current financial standing. The financial director is allotted time at the end of the meeting to pass out budget amendments that will be submitted to FDOE when needed. In addition, the

financial director works with the personnel director and superintendent directly on all financial matters within the district.

- Monitoring staff conducted a budget analysis of BCSD's FDOE grants. Upon review, the following non-compliance findings were discovered:
 - (G1): Several deviations from the original grant approved by the FDOE compared to the DOE399 and DOE499 were found during the grant budget analysis. The deviancies found are listed below.
 - Expenditures in several object codes on financial distribution form DOE399 and DOE499 were not previously approved by FDOE, and no record of any budgetary amendments were submitted to FDOE to authorize new codes.
 - Project number 040-1619B-9CR01: 210, 220, 230 and 750
 - Project number 040-1610B-0CR01: 210 and 220
 - project number 040-1619B-9CG01: 130 and 390
 - project number 040-1910B-0CG01: 210 and 230
 - Expenditures in several object codes were overspent from original grant funding approved by the FDOE on the final DOE399 and DOE499. No amendments were submitted to reconcile the original budget object codes to match final expenditure forms for following grants:
 - Project number 040-1619B-9CS01: 120, 130 and 220
 - Project number 040-1910B-0CG01: 330 and 510
 - Project number 040-1619B-9CR01: 150, 520 and 790
 - Project number 040-1619B-9CG01: 210, 220, 330 and 520
 - Project number 040-1910B-0CG01: 130, 220, 330 and 520

FINDING AND ACTION

- Finding G1: The provider failed to file a request of budgetary amendment for an expenditure that was not previously approved in their original grant application. Furthermore, budgetary amendments were not filed for overture of spending on multiple object codes. This is in violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments."
 - Corrective Action G1: (1) The CTE director shall provide a memo of attestation stating the district acknowledges the finding. No other action is required.

H. COLLABORATION: refers to the collaborative agreements, partnerships or memorandum of understanding (MOU) that are in place to benefit an agency's programs and students.

- BCSD has multiple collaborations for articulation and MOUs within the local community. They often offer additional educational and job experiences to students within the district. The current partner is but not limited to:
 - MOU: CareerSource North Florida
 - Articulation: North Florida Technical College (NFTC)

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – BCSD is required to complete a CTE Corrective Action Plan.

ADULT EDUCATION

1. Corrective Action Plan – BCSD is required to complete an AE Corrective Action Plan.

IX. SUMMARY

Once the VDMR 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 with a copy sent to the provider 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 Bradford County School District virtual desk monitoring review. Special thanks is offered to Mr. Brad Bishop for his participation and leadership during this VDMR process.

APPENDIX A

Bradford 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: **BRADFORD COUNTY SCHOOL DISTRICT**
Program Type: CTE
Target Year: **2018-2019**
Monitoring Year: **2020-2021**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	5	<u>X 10</u>	50
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	3	<u>X 8</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	7	<u>X 4</u>	28
	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:					138

Data sources used for calculations: Prior to July 1, 2019

Bradford County School District
Adult Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants					
Agency Name: BRADFORD COUNTY SCHOOL DISTRICT					
Program Type: AE					
Target Year: 2018-2019					
Monitoring Year: 2020-2021					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	5	<u>X10</u>	50
	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	1	<u>X 8</u>	8
	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					116

Data sources used for calculations: Prior to July 1, 2019

APPENDIX B

Bradford County School District
Required Action Plan

Finding	Required Action	Agency Response	Projected Date of Completion
Finding G1: The provider failed to request a budgetary amendment for an expenditure that was not previously approved in their original grant application. This is in violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments."	Corrective Action G1: (1) The CTE director shall provide a memo of attestation stating the district acknowledges the finding. No other action is required.	Bradford County Acknowledges and accepts the finding and provided a memorandum of attestation on June 21, 2021.	06/21/2021
<p>Plan submitted by (name and title): Brad Bishop, CTE & AE Director Date: 06/21/2021</p> <p>Plan accepted by: Orion M Price Date: 06/21/2021</p>			
<p>Status of Action Plan (to be completed by FDOE staff):</p>			
<p>Date: 06/21/2021</p>		<p>Status of Plan Completion: Completed</p>	