

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

Calhoun County School District

July 31, 2020

Final Report

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Florida Department of Education Division of Career and Adult Education

Calhoun 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 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 Calhoun County School District (CCSD) was determined to be an onsite monitoring review, but due to limitations caused by the COVID-19 pandemic, the strategy was changed to a virtual desk monitoring review. Notification was sent to Mr. Darryl Taylor Jr., superintendent, Calhoun County School District on December 17, 2019. The designated representative for the agency is Ms. Debbie Williams.

The desk monitoring review was originally scheduled to be an onsite visit from May 4-6, 2020, but due to the COVID-19 pandemic, the provider was rescheduled and given a due date of July 31, 2020. The representative of the division conducting the desk monitoring review was program specialist, Mr. Charles Davis, of the Quality Assurance and Compliance section.

V. CALHOUN COUNTY SCHOOL DISTRICT

ENROLLMENT:

<u>Fiscal Year (FY) 2017-18</u> CTE (possible duplication at program level): Secondary – 999 AE: 37

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

Finance			
FY 2017-18			
<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Adult General Education	070-1918B-8CG01	\$ 58,840.00	\$ 113.50
Perkins CTE Secondary	070-1618A-8CS01	\$ 27,495.00	\$ 615.69
Perkins CTE Rural	070-1618A-8CR01	\$ 33,447.00	\$.00
FY 2018-19			
<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Adult General Education	070-1919B-9CG01	\$ 58,840.00	\$ 3,899.34
Perkins CTE Secondary	070-1619B-9CS01	\$ 30,629.00	\$.00
Perkins CTE Rural	070-1619B-9CR01	\$ 33,508.00	\$.00
FY 2019-20*			
Grants	Grant Number	Grant Amount	<u>Unexpended</u>
Adult General Education	070-1910B-0CG01	\$ 58,840.00	\$ n/a
Perkins CTE Secondary	070-1610B-0CS01	\$ 30,028.00	\$ n/a
Perkins CTE Rural	070-1610B-0CR01	\$ 33,855.00	\$ 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: http://calhounflschools.org/

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 desk monitoring process.

Name	Title	Entrance	Exit
		Conference	Conference
	Director of Adult Education & Career and	Х	Х
Debbie Williams	Technical Education		
FDOE Monitoring			
Team			
Charles Davis	Program Specialist, QAC, FDOE	Х	Х
Michael Swift	Program Specialist, QAC, FDOE	Х	Х

Interviews

CCSD 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. <u>ADMINISTRATION:</u> refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.
 - CTE and AE administrators are heavily involved in all aspects of program management in areas such as program improvement, data and assessment, and inventory management.
 - There is a separation of duties between the administrative side of grant management and the financial side, but the organizational structure of a small district allows both sides to work together cohesively to ensure a continuous flow of information between the two.
 - CCSD CTE administrators have an ongoing relationship with stakeholders to create and continue implementing their comprehensive local needs assessment (CLNA) to be included with their 2020-2021 grant application to FDOE. Stakeholder meeting minutes and records were reviewed as part of the monitoring process.
 - A comprehensive program of professional development is coordinated and implemented in accordance with Florida's Professional Development Protocol Standards through the Panhandle Area Educational Consortium (PAEC) Professional Development Center.

- **B.** <u>**DATA AND ASSESSMENT:**</u> 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 uses the FOCUS® system as its integrated management information system (MIS).
 - All data elements required of their local MIS were included in the system and verified during the desk review.
 - There is a review/verification process that takes place prior to submitting student data to FDOE. If any data errors are reported back to the district the school secretary and reports coordinator assist with correcting erroneous data.
 - The MIS manager is responsible for state reporting of the data and receives training in NRS requirements, data collection procedures, data entry, and other pertinent areas of the MIS.
 - Student and program data is utilized for program management and improvement. These data reviews help to identify exemplary programs, as well as those that may be struggling.
 - The district has internal controls that ensure each individual has access to only a specific part of the MIS to prevent too many people from being able to view sensitive student data.
 - The district does have policies and procedures for data collection, review and submission to FDOE.
 - Upon reviewing student performance data, it was discovered ten students were reported as earning a literacy completion point (LCP) but did not meet the appropriate benchmarks for attainment. This will result in a finding. The provider's responsibility is to be mindful of collecting and reporting data accurately, as outlined in the FDOE Data Handbook. The provider was informed of the data error and acknowledged inaccurate data submission to FDOE.

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."
 - Corrective Action B1: The Provider is required to receive training from the FDOE Adult Education program section. Documentation of sign-in sheets, training materials and agendas must be provided to the monitoring staff.
- C. <u>CURRICULUM AND INSTRUCTION:</u> refers to those elements that contribute to student learning and skill acquisition.
 - CCSD offers CTE and AE programs across multiple secondary campuses within the county.
 - CCSD offers reasonable services and accommodations to students who self-declare a disability.
 - Students have the opportunity to participate in the district on-the-job training (OJT) and school-to-work programs where they have opportunities to engage in career-oriented vocational training.
 - AE instructors incorporate workforce preparation and technology skills into classroom instruction. Students are given materials and content related to jobs, careers and transition to postsecondary education.
 - The CTE programs are supported by advisory committees that meet throughout the program year. These committees play a pivotal role in improving CTE programs' quality by offering insight into the current industry and workforce trends.
 - The district has a relationship and memorandum of understanding (MOU) with CareerSource Chipola to provide career services and student training.

- 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, and certifications were verified while onsite.
- **D.** <u>**TECHNOLOGY AND EQUIPMENT:**</u> 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 federal, state, and local guidelines are included within the inventory management system.
 - The information technology director is responsible for all district equipment. A physical inspection and inventory of equipment takes place annually.
 - The district has a technology plan that includes policies on new equipment requests, equipment safety/storage, and old inventory disposal.
 - There have been no reports of stolen or lost equipment over the previous three fiscal years.
 - No capitalized equipment was purchased during the years monitored.
- E. <u>ACCESS AND EQUITY:</u> refer to compliance with the requirements of federal nondiscrimination 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. <u>RECORDS REVIEW:</u> 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 and CLNA committee minutes and records
 - District procurement/purchasing records
 - Size, scope and quality checklist review
 - MIS data quality checklists
 - District policies and procedures for finance and procurement
 - District technology plan
 - Student and employee handbooks
 - Policies and procedures on inventory/equipment management
 - TABE certifications
 - Student progression plans
 - Memorandums of Understanding (MOUs) and articulation agreements
- G. <u>FINANCIAL</u>: 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 has financial policies and procedures in place to ensure the efficient cash management of CTE and AE grants funds.
 - Skyward[®] is the district Enterprise Resource Planning (ERP) system that includes accounting, procurement, inventory management and payroll records.

- The district has detailed and thorough procedures for the procurement of equipment and inventory that is funded by its federal grants.
- Grant-funded purchases must go through an extensive approval process prior to any grant funds being disbursed. The approval process includes grant administrators, finance staff and the district superintendent (when applicable).
- District administrators host regular reconciliation meetings to review budget expenditures to gauge budget utilization moving forward. These meetings allow for reallocation of funds via amendment if the opportunity exists.
- Monitoring staff conducted a budget analysis of CCSD's FDOE grants. Upon review, there were no discrepancies discovered:
- **H.** <u>COLLABORATION:</u> 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 numerous collaborations and MOUs within the local community. They often offer additional educational and job experiences to students within the district. The list of partners includes, but are not limited to:
 - Lively Technical College
 - CareerSource Chipola
 - Tallahassee Community College
 - Capital City Youth Services

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – CCSD is not required to complete a CTE Corrective Action Plan.

ADULT EDUCATION

1. Corrective Action Plan – CCSD 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 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: <u>http://fldoe.org/academics/career-adult-edu/compliance</u>.

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 CCSD virtual desk monitoring review. Special thanks is offered to Ms. Vicki Davis for her participation and leadership during this process.

APPENDIX A

Calhoun 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: CALHOUN COUNTY SCHOOL DISTRICT Program Type: CTE Target Year: 2017-2018 Monitoring Year: 2019-2020

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7		V 10	
Number of Years Since Last	5-6	5	7		70
Number of Years Since Last Monitored Total Budget for all Perkins Grants Combined Number of Perkins Grants Change in Management Information Systems (MIS) from Previous Fiscal Year	3-4	3	/	<u>A 10</u>	
	ScalingValueAssignedWeightSince Last7 or More Years7 3 or More Years1 3 or More Years3 3 or More Years1 3 or More Years1 3 or More Years3 3 or More Years1 3 or				
	Upper Quartile	7			8
Total Budget for all Perkins	Upper Middle	5	1	<u>X8</u>	
	Lower Middle	3	1		
	Lower Quartile	1	Assigned 7 1 3 0 0 3 3		
	4 or More	7			
Number of Deriving Cuents	3	5	3 <u>X 8</u>	<u>X 8</u>	24
Number of Perkins Grants	2	3			
	1	1			
	Yes	7	0	V ć	0
	Monitored3-437Budget for all Perkins rants CombinedUpper Quartile7Budget for all Perkins rants CombinedUpper Middle5Lower Middle31Lower Quartile14 or More7352311ation Systems (MIS) Previous Fiscal YearYesYearYesNo0CTE Program Director from Previous Fiscal YearYesNo0Upper Quartile7Upper Middle5Lower Middle3as Grants CombinedUpper QuartileUpper Quartile100Upper Middle5Lower Middle3334333433343435353535363737 </td <td><u><u><u></u><u></u><u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u></u></u></u></td> <td>U</td>	<u><u><u></u><u></u><u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u></u></u></u>	U		
Agency CTE Program Director Change from Provious Fiscal	Yes	7		X 6	0
8	No	0		<u>A 0</u>	U
Unexpended Funds from all		-	-		
		3	3	<u>X 4</u>	12
rerkins Grants Combined	Lower Quartile	-	-		
	0	-			
Number of Findings from the					
			<u>3</u> <u>X</u>	<u>X 4</u>	12
Since of the Auditor General					
	0	0			
			AGENCY RISK	SCORE:	126

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

Calhoun County School District Adult Education Risk Matrix

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

Agency Name: CALHOUN COUNTY SCHOOL DISTRICT Program Type: AE Target Year: 2017-2018 Monitoring Year: 2019-2020

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years 7 $X10$ $5-6$ 5 7 $X10$ $0-2$ 1 1 $X8$ $0-2$ 1 1 $X8$ $0-2$ 1 1 $X8$ $0-2$ 1 1 $X8$ 1 $X8$ 1 $X8$ 1 $X8$ 1 $X8$ 1 1 1 1 $4 or More$ 7 7 0 2 3 1 $X8$ 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 $X6$ 1 1 1 $X6$ 1 1 1 $X4$ 1 2 3 3 $X4$ 1 2 3 3 3 1 1 1 $X4$ 1 2 3 3 3 1 1 1 1 2 3 3 3 3 1 2 3 3 3 1 1 1 1 1 2 3 3 3 1 2				
Number of Years Since Last	5-6	5		70	
Monitored	3-4	3	/	<u>A10</u>	70
	0-2	1			
	MetricScalingValueAssigned7 or More Years7of Years Since Last5-65Monitored3.4430-21Budget for all Adult on Grants CombinedUpper Quartile7Upper Quartile71Lower Widdle31Lower Quartile14 or More7r of Adult Education Grants35231ge in Management ation Systems (MIS) revious Fiscal YearYes7No00VearNo0VearNo0Med Funds from all Education GrantsUpper Quartile7OVear00000000000000111<				
Number of Years Since Last Monitored Total Budget for all Adult Education Grants Combined Number of Adult Education Grants Change in Management Information Systems (MIS) from Previous Fiscal Year Agency AE Program Director Change from Previous Fiscal Year Unexpended Funds from all Adult Education Grants Combined Number of Findings from the Office of the Auditor General	Upper Middle	-		X10 X 8 X 8 X 6 X 6 X 4 X 4	8
	Lower Middle	3	1		
	Lower Quartile	1			
	4 or More	7			
Number of Adult Education	3	5		<u>X 8</u>	8
Grants	2	3			
Number of Years Since Last Monitored Total Budget for all Adult Education Grants Combined Number of Adult Education Grants Change in Management Information Systems (MIS) from Previous Fiscal Year Agency AE Program Director Change from Previous Fiscal Year Unexpended Funds from all Adult Education Grants Combined Number of Findings from the Diffice of the Auditor General Adult Education Program	1	1			
	Yes	7	0	V 6	0
from Previous Fiscal Year	No	0		<u>× 0</u>	U
Agency AE Program Director Change from Previous Fiscal	Im Director rious FiscalYes70No00Upper Quartile7	<u>X 6</u>	0		
Year	No				
	Upper Quartile				4
Unexpended Funds from all Adult Education Grants				<u>X 4</u>	
		3	1		
	Lower Quartile				
	0				
		7		<u>X 4</u>	12
Education Grants Combined Number of Adult Education Grants Change in Management Information Systems (MIS) from Previous Fiscal Year Agency AE Program Director Change from Previous Fiscal Year Unexpended Funds from all Adult Education Grants Combined Number of Findings from the Office of the Auditor General		5			
		3	3		
Office of the Additor General	Lower Quartile	1			
	÷	ValueAssignedMore Years7 $5-6$ 5 $3-4$ 3 $0-2$ 1er Quartile7 $0-2$ 1er Quartile7 $0-2$ 1er Quartile1 $0-2$ 1er Middle5//>/ Yer Middle3 1 1 0 0 0 0 0 0 Yes7 0 0 Yes7 0 0 Yes7 0 No 0 Yes7 0 No 0 er Quartile7 0 er Quartile7 0 er Quartile7 0 er Quartile7 0 0 0 0 0 1 0 0 0 1			
	on 3 of 3	5			
	Target Not Met				
	-	3	X 6	6	
Improvement Plan (AEPIP)				<u><u> </u></u>	U
	-	1			
	All targets met	0			
			Agency	Risk Score	108

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

APPENDIX B

Calhoun County School District Corrective Action Plan

Finding	Corrective Action	Agency Response	Projected Date of Completion			
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."	Corrective Action B1: The Provider is required to receive training from the FDOE Adult Education program section. Documentation of sign-in sheets, training materials and agendas must be provided to the monitoring staff.	The CCSD will participate in training provided by the FDOE Adult Education Program. In the future CCSD will accurately report student data. When reporting data (literacy completion points) the appropriate benchmarks for attainment will be provided.	April 21, 2021			
Plan submitted by (name and title): Debbie Williams Date: 4/7/2021 Plan accepted by: Chuck Davis Date: 4/7/2021						
Date: 5/4/2021	e completed by FDOE staff): Stat	tus of Plan Completion: Complet	e			