



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

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

**Columbia County School District**

**April 26-30, 2021**

**Final Report**

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Florida Department of Education  
Division of Career and Adult Education

**Columbia 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 21<sup>st</sup> 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 Columbia County School District (CCSD) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Alex Carswell, superintendent, Columbia County School District on December 1, 2020. The designated representative for the agency was Tabatha McMahon. The current representative is Ms. Angela Coppock.

The representative of the division conducting the VDMR was program specialist, Mr. Chuck Davis of the Quality Assurance and Compliance section.

## V. COLUMBIA COUNTY SCHOOL DISTRICT

### ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 6,762

AE: 295

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	120-1919B-9CG01	\$ 134,429.00	\$ 17,647.05
Perkins Rural	120-1619B-9CR01	\$ 68,209.00	\$ 913.34
Perkins Secondary	120-1619B-9CS01	\$ 126,046.00	\$ .00

##### **FY 2019-20**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	120-1910B-0CG01	\$ 130,355.00	\$ 1,817.93
Perkins Rural	120-1610B-0CR01	\$ 67,988.00	\$ .00
Perkins Secondary	120-1610B-0CS01	\$ 190,106.00	\$ 1,041.91

##### **FY 2020-21\***

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	120-1911B-1CG01	\$ 130,355.00	\$ N/A
Perkins Rural	120-1611B-1CR01	\$ 58,007.00	\$ N/A
Perkins Secondary	120-1611B-1CS01	\$ 175,920.00	\$ 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.columbiak12.com/en-US>

## 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 CCSD was conducted on April 26, 2021. The exit teleconference was conducted on April 30, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Angela Coppock	Director of Career and Technical Education & Adult Education	X	X
Todd Widergren	Assistant Superintendent	X	
Patrick Mitchell	IT Director	X	
Tiara Arline	Coordinator of College, Career, and Technical Education	X	
Janora Crow	Adult Education Lead Teacher/ Program Manager	X	X
Alex Carswell	Superintendent		X
<b>FDOE Monitoring Team</b>			
Chuck Davis	Program Specialist, QAC, FDOE	X	X
Michael Swift	Program Specialist, QAC, FDOE	X	X
Orion Price	Program Specialist, QAC, FDOE	X	

### 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. **ADMINISTRATION:** refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.

- CCSD has policies and procedures for writing and completing grant applications prior to being submitted to FDOE. The AE and CTE coordinators work with their program coordinators and the district grants facilitator to ensure that all program needs are included within the grant application. Once the grant application draft is complete, the district superintendent must review it before it is sent to FDOE.
- Each month the Finance Assistant prints FA399's for each active project. These reports are first reviewed to identify any concerns. The Finance Assistant will check for any budget over expenditures to see if the grant is close to having the budget expended or any expenditures that look out of ordinary for the grant. Notes are added and the reports are then sent to the Project Administrator to review.
- CTE directors belonging to the Northeast Florida Education Consortium began meeting in the spring of 2019 to start planning for the CLNA and reviewing requirements and discussing the

process and how rural districts could implement it. CCSD established a district-level leadership team to oversee the process. Part of the initial groundwork involved several meetings with stakeholders and having CTE teachers review and self-assess their program using a modified ACTE CTE Programs of Study Self-Assessment.

- AE and CTE administrative staff are provided opportunities to attend applicable professional development including industry specific conferences (FFA/Leadership) and more universal conferences such as FACTE and NCPN conference. CCSD offers access and information on FACTE online courses and other relevant industry professional development.

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

- CCSD utilizes the FOCUS® system as its integrated management information system (MIS).
- Data staff and program administrators participate in a minimum of one FLDOE MIS/Work Force Development Information System training each year.
- All of the data elements required of their local MIS were included in the system and verified during the desk review.
- Following the Family Educational and Privacy Act (FERPA), CCSD students' records are protected. Generally, schools must have written permission from the parent or eligible student in order to release any information from a student's education record. The registration form (filled out each semester) contains a Release of Information page. If a student is under 18 years of age, his or her parent signs the form following FERPA guidelines.
- CCSD incorporates a data quality review plan prior to submitting any student data to the state. The district data entry specialist enters all student data, then reviews the workforce data information system (WDIS) validation report for errors. Once all errors are fixed the district Systems Analyst submits the survey data to FDOE.
- Upon reviewing student performance data, it was discovered one student was reported as earning a literacy completion point (LCP) but did not meet the appropriate benchmarks for attainment. Also, one student was awarded an industry certification in Certified Food Safety Manager, but the student's test scores did not represent a passing score for certification. This resulted in a data finding and will require the reimbursement of any Career and Professional Education (CAPE) funds received for the submission of the unearned industry certification.
- These will result in findings. 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 errors and acknowledge inaccurate data submission to FDOE.

#### FINDING AND ACTION

- Finding B1: The provider failed to accurately report student data in FY 2018-19. This is in violation of UGG 2 CFR 200.328 "Monitoring and reporting program performance."
- Corrective Action B1: The Provider is required to review the following: [AGE Placement and Reporting of Learning Gains - October 14, 2019, Webinar Presentation](#) (PDF) and [Q&A for AGE Placement and LCP Policy Updates for 2019-20 Reporting](#). The AE Coordinator shall draft and submit a memo of attestation stating their intentions to provide staff training in the area of LCP attainment and reporting. This memo shall include the anticipated date(s) of the training(s); the individual(s) responsible for conducting the training(s); the names and titles of those individuals to be involved in the training; including the instruments that were provided. Once the training and memo are submitted to your monitoring team lead, no further action will be required.
- Finding B2: The provider failed to accurately report student data in FY 2018-19. This is in violation of UGG 2 CFR 200.328 - Monitoring and reporting program performance; and F.S. 1008.43 - Career program reporting requirements.
- Corrective Action B2: The provider will coordinate with the FDOE Research and Evaluation section to address the data reporting error and complete the repayment process for any funding

received as part of the CAPE program. The FDOE monitor will provide the necessary contact information. No further action is required of the QAC section.

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

- The comprehensive local needs assessment (CLNA) showed that too many of CCSD current offerings were generated out of student interest and not local labor needs. A myriad of programs did not meet local need; however, resources were spread so thin amongst all current programs, the district did not have the focus needed to pursue proper Programs of Study. By narrowing down programs from 20 to 11, CCSD can concentrate on what is holding them back with POS and provide more in-depth pathways for students through more CTSO and Work Based Learning opportunities.
- The CCSD CTE office currently disseminates information on all CTE course offerings, including their sole POS (Welding) through activities including High school classroom presentations through new freshman Experience Course. Publication/dissemination of program information via CTE website and printed publications including local newspapers, and magazine advertisements, etc.; Participation at various school and districtwide events, e.g., Career and Education fairs, Orientation days, Middle School CTE Sampling Day, etc. New informational initiatives this year include Utilizing a new online student career assessment and planning tool, concentrating in middle school to help students and parents understand the CTE program opportunities within CCSD system. CCSD are also bringing it on-board at the high schools, concentrating on freshman. This software is customizable to programs offered and increased abilities to collect information on students' career plans and decisions.
- All students with disabilities participate in annual individualized education plan meetings each year. ESE specialists with expertise in transition and planning discuss academic and career opportunities available in the district.
- Each year, faculty and staff are surveyed about professional learning needs and the professional learning participated in throughout the year. The district currently participates in local and state college recruitment fairs, the Northeast Florida Educational Consortium Annual Job Fair, local community job fairs for teachers, administrators, and school counselors.
- Tests of adult basic education (TABE) is 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 federal, state and local guidelines are included within the inventory management system. The inventory management system was verified during the VDMR.
- 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.

- 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
  - 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.
- The district has financial policies and procedures in place to ensure the efficient management of CTE and AE grant funds.
  - Each month the Finance Assistant prints FA399's for each active project. These reports are first reviewed to identify any concerns. The Finance Assistant reviews for any budget over expenditures to see if the grant is close to having the budget expended or if there are any expenditures that look out of the ordinary for the grant. Notes are added and the reports are then sent to the Project Administrator to review.
  - Skyward® is used as the district's Enterprise Resource Planning (ERP) system. The system allows for shared knowledge of expenditures and real-time financial activity. All grant funds and purchase orders are managed within this system.
  - The district has detailed and thorough procedures for the procurement of equipment and inventory funded by its federal grants. The approval process for a purchase is determined by pre-set monetary thresholds set by the district. All capitalized purchases regardless of price can receive final approval from the district superintendent. The School Board must approve purchases of \$35,000 and above.
  - Monitoring staff conducted a budget analysis of CCSD's FDOE grants. Upon review, the following non-compliance findings were discovered:
    - (G1): CTE 2018-19, 2019-20 budget narratives which resulted in the DOE399 (final expenditure report) to include the following:
      - Expenditures in several object codes (360; 369 and 644) were not previously approved by FDOE, and no record of any budgetary amendments was submitted to FDOE to authorize the new object codes. Expenditures in object codes (120; 121; 210; 330; 369; 644 and 730) were overspent.
      - Expenditures in the above-referenced object codes are deemed allowable under this federal program. No cost recovery is required.



## FINDING AND ACTION

- 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.

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

- CCSD has 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 include, but are not limited to:
  - CareerSource Florida Crown
  - First Federal State Bank
  - Lake City Medical Center
  - Northeast Florida Education Consortium
- CCSD has an articulation agreements with Florida Gateway College.

## **VIII. REQUIRED RESOLUTION ACTIVITIES**

### CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – CCSD is 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 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 Columbia County School District virtual desk monitoring review. Special thanks is offered to Ms. Angela Coppock for her participation and leadership during this process.

**APPENDIX A**

Columbia County School District  
 Career and Technical Education  
 Risk Matrix

<b>Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants</b>					
Agency Name: <b>COLUMBIA COUNTY SCHOOL DISTRICT</b>					
Program Type: <b>CTE</b>					
Target Year: <b>2018-2019</b>					
Monitoring Year: <b>2020-2021</b>					
<b>Metric</b>	<b>Scaling</b>	<b>Point Value</b>	<b>Points Assigned</b>	<b>Weight</b>	<b>Total Metric Points</b>
<b>Number of Years Since Last Monitored</b>	7 or More Years	7	<b>7</b>	<u><b>X 10</b></u>	<b>70</b>
	5-6	5			
	3-4	3			
	0-2	1			
<b>Total Budget for all Perkins Grants Combined</b>	Upper Quartile	7	<b>3</b>	<u><b>X8</b></u>	<b>24</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Perkins Grants</b>	4 or More	7	<b>3</b>	<u><b>X 8</b></u>	<b>24</b>
	3	5			
	2	3			
	1	1			
<b>Change in Management Information Systems (MIS) from Previous Fiscal Year</b>	Yes	7	<b>0</b>	<u><b>X 6</b></u>	<b>0</b>
	No	0			
<b>Agency CTE Program Director Change from Previous Fiscal Year</b>	Yes	7	<b>0</b>	<u><b>X 6</b></u>	<b>0</b>
	No	0			
<b>Unexpended Funds from all Perkins Grants Combined</b>	Upper Quartile	7	<b>7</b>	<u><b>X 4</b></u>	<b>28</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Number of Findings from the Office of the Auditor General</b>	Upper Quartile	7	<b>3</b>	<u><b>X 4</b></u>	<b>12</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>AGENCY RISK SCORE:</b>					<b>158</b>

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

Columbia County School District  
Adult Education  
Risk Matrix

<b>Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants</b>					
Agency Name: <b>COLUMBIA COUNTY SCHOOL DISTRICT</b>					
Program Type: <b>AE</b>					
Target Year: <b>2018-2019</b>					
Monitoring Year: <b>2020-2021</b>					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
<b>Number of Years Since Last Monitored</b>	7 or More Years	7	<b>7</b>	<u>X10</u>	<b>70</b>
	5-6	5			
	3-4	3			
	0-2	1			
<b>Total Budget for all Adult Education Grants Combined</b>	Upper Quartile	7	<b>3</b>	<u>X 8</u>	<b>24</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Adult Education Grants</b>	4 or More	7	<b>1</b>	<u>X 8</u>	<b>8</b>
	3	5			
	2	3			
	1	1			
<b>Change in Management Information Systems (MIS) from Previous Fiscal Year</b>	Yes	7	<b>0</b>	<u>X 6</u>	<b>0</b>
	No	0			
<b>Agency AE Program Director Change from Previous Fiscal Year</b>	Yes	7	<b>0</b>	<u>X 6</u>	<b>0</b>
	No	0			
<b>Unexpended Funds from all Adult Education Grants Combined</b>	Upper Quartile	7	<b>0</b>	<u>X 4</u>	<b>0</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Number of Findings from the Office of the Auditor General</b>	Upper Quartile	7	<b>3</b>	<u>X 4</u>	<b>12</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Adult Education Program Improvement Plan (AEPIP)</b>	Target Not Met on 3 of 3 Indicators	5	<b>5</b>	<u>X 6</u>	<b>30</b>
	Target Not Met on 2 of 3 Indicators	3			
	Target Not Met on 1 of 3 Indicators	1			
	All targets met	0			
<b>Agency Risk Score</b>					<b>144</b>

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

**APPENDIX B**

Columbia County School District  
Corrective Action Plan

Finding	Corrective Action	Response	Projected Date of Completion
<p>Finding B1 &amp; B2: The provider failed to accurately report student data in FY 2018-19. This is in violation of UGG 2 CFR 200.328 “Monitoring and reporting program performance.”</p>	<p>Corrective Action B1: The Provider is required to review the following: <a href="#">AGE Placement and Reporting of Learning Gains - October 14, 2019, Webinar Presentation</a> (PDF) and <a href="#">Q&amp;A for AGE Placement and LCP Policy Updates for 2019-20 Reporting</a>. The AE Coordinator shall draft and submit a memo of attestation stating their intentions to provide staff training in the area of LCP attainment and reporting. This memo shall include: the anticipated date(s) of the training(s); the individual(s) responsible for conducting the training(s); the names and titles of those individuals to be involved in the training; and what training instruments will be used. Once the memo is submitted back to your monitoring team lead no further action will be required. Corrective Action B2: The provider will coordinate with the FDOE Research and Evaluation section to address the data reporting error and complete the repayment process for any funding received as part of the CAPE program. The FDOE monitor will provide the necessary contact information. No further action is required of the QAC section.</p>	<p>B1: Letter of Attestation and Staff training scheduled to address areas of deficiency.</p> <p>B2: Documentation of completion received on 5/21/2021 for identified student. No repayment is due to the department.</p>	<p>5/21/2021</p>
<p>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.”</p>	<p>Corrective Action G1: (1) The CTE director shall provide a memo of attestation stating the district accepts the finding. No other action is required.</p>	<p>Letter of Attestation and Staff training to address area of deficiency.</p>	<p>6/30/2021</p>
<p><b>Plan submitted by (name and title): Angela Coppock, Director</b> <b>Date: 5/25/2021</b></p>			
<p><b>Plan accepted by: Charles Davis</b></p>		<p><b>Date: 5/25/2021</b></p>	
<p><b>Status of Action Plan (to be completed by FDOE staff)</b></p>			
<p><b>Date: 5/25/2021</b></p>		<p><b>Status of Plan Completion: Complete</b></p>	