



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Florida Virtual School

March 9 - July 24, 2020

Final Report

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**Florida Virtual School
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 Florida Virtual School (FLVS) was determined to be a desk monitoring review. Notification was sent to Dr. Louis Algaze, chief executive officer, Florida Virtual School on December 17, 2019. The designated representative for the agency was Ms. Jenny McDonough, entitlement grant manager, Florida Virtual School.

The desk review of the provider was conducted March 9-13, 2020. The representative of the division to conduct the desk review was program specialist, Mr. Michael Swift of the Quality Assurance and Compliance section.

V. FLORIDA VIRTUAL SCHOOL

ENROLLMENT:

Fiscal Year (FY) 2017-18

CTE (possible duplication at program level): 10,737

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

Finance

FY 2017-18

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Secondary	48C-1618B-8CV01	\$ 25,000.00	\$ 900.94

FY 2018-19

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Secondary	48C-1619B-9CV01	\$ 30,000.00	\$ 159.14

FY 2019-20*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Secondary	48C-1610B-0CV01	\$ 30,000.00	\$ N/A

*FY 2019-20 final project disbursement reports will not be available until the end of the program year

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

<https://www.flvs.net>

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.

Entrance and Exit Conferences

An introductory teleconference for FLVS was conducted on March 5, 2020. The exit conference was conducted on July 24, 2020. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Jenny McDonough	Entitlement Grant Manager	X	X
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	X	X

Interviews

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

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 also reviewed.

VII. RESULTS

- A. **ADMINISTRATION:** refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.
- FLVS is unique in that they do not use Perkins V grant funds to directly support their CTE program offerings. FLVS uses their Perkins V allocation to support travel and registration to Association for Career and Technical Education (ACTE) and Florida Association of Career and Technical Education (FACTE) conferences, student practice vouchers, exam fees for industry certifications and training materials.
 - FLVS employs an Entitlement Grant Administrator who is responsible for managing grant expenditures as they relate to the operation of their CTE programs.
 - FLVS offers a multitude of professional development opportunities for curriculum specialists and other CTE personnel. The Curriculum Specialists are members of ACTE and FACTE, and attend the training conferences every year.
 - FLVS is currently working with stakeholders for the creation and future implementation of their comprehensive local needs assessment (CLNA) to be included with their 2020-2021 grant application to FDOE.
- 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.
- FLVS has standard operating procedures (SOP) for data collection, review and submission to FDOE. They also have individual SOPs regarding industry certifications, accountability and assessment matching.
 - FLVS has an Analysis, Assessment and Accountability team that serves as a liaison to FDOE. Duties include, but are not limited to:
 - providing education, administration and support for high-stakes, Advanced Placement and Industry Certification assessment practices.
 - a thorough understanding of state and national assessment data; and
 - support at the school and district level to ensure that state accountability standards and requirements are achieved.

- FLVS has staff with specific duties and responsibilities for data collection, entry and verification. Job descriptions were reviewed for these positions.
- FLVS uses the FOCUS® system as their integrated student information system (SIS). All of the data elements required of their local MIS were included in the system and verified during the desk review.
- There is a checks and balances system that takes place prior to submitting student data to FDOE. If any data errors are reported back from FDOE the Analysis, Assessment and Accountability team will assist with correcting erroneous data.
- Student and program data, enrollment data and labor market demands are all taken into account for program improvement and the possible expansion of program offerings. This also allows FLVS to gauge the likelihood of achieving grant requirements.
- Upon review of student performance data, it was discovered that multiple students were reported as earning an occupational completion point (OCP), but did not take and/or pass the required courses. This will result in a finding. All student level data was made available to the FDOE monitoring staff during the desk monitoring review.

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: (1) Additional training shall be conducted on what qualifies for earned OCPs. All instructors and administrative staff involved in the collection and verification of student level data shall be included in this training. (2) FLVS will be required to draft and submit a memo of attestation stating their intentions to provide such training. This memo shall include: the date(s) of the training; the individual(s) responsible for conducting the training; the names and titles of those individuals to be involved in the training; what training instruments will be used; and the signature of the Entitlement Grant Administrator.

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

- The CTE programs are supported by advisory committees that meet over the course of a program year. These committees play a pivotal role in improving the quality of the CTE programs by offering insight on current industry trends, workforce needs and projected job outlooks. Specifically, the Web Design advisory committee will assist in the development of future programs of study (POS).
- Guidance counselors receive training in CTE offerings and play a pivotal role in increasing student and parental awareness of CTE programs, career pathways and programs of study.
- FLVS offers reasonable services and accommodations to students who self-declare a disability to their full time school. Each student who is identified as part of this special population is assigned a case manager to assist the student in receiving approved services and accommodations.
- FLVS students are required to take core academic courses such as math, English and science in addition to their required CTE courses.
- FLVS does have an articulation agreement with Polk State College (PSC) that will allow eligible students to earn college credits upon completion of an equivalent articulated course. PSC also sits on the FLVS Web Design advisory committee.
- FLVS plans to fully implement at least 12 new POS and related industry certifications. This plan will be fully implemented by 2029.
- A competitive salary schedule is used to attract and retain qualified and experienced CTE instructors. All instructors are required to complete extensive training in the areas of industry and labor market demand, industry certifications and how to guide students through a POS.

- FLVS conducts annual reviews of labor market demands, state enrollment data and certification passage rates when making decisions about new course and POS offerings.
- Students are afforded the opportunity to participate in Career and Technical Student Organizations (CTSO) such as Future Farmers of America (FFA) and Future Business Leaders of America (FBLA).

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.

- FLVS does not use federal Perkins V grant funding for equipment and technology purchases. Therefore, no review of equipment and technology was required during this desk monitoring review.

E. ACCESS AND EQUITY: refers to compliance with the requirements of federal non-discrimination laws as relating to recruitment, enrollment, participation and completion of programs.

- The Office of Equal Educational Opportunity (OEEEO) is responsible for monitoring and overseeing civil rights compliance obligations. Should you have any questions or concerns, please contact the OEEEO at 850-245-0511.

F. RECORDS REVIEW: refers to a review of the records and documents that evidence compliance with federal and state rules and regulations. A sampling of financial and programmatic records is reviewed.

- Sample advisory committee minutes, agendas and sign-in sheets
- Size, scope and quality checklist review
- District policies and procedures for finance and procurement
- Data and assessment resource manuals
- Procurement records
- Desk monitoring review packet
- Student data records
- Internal control policies
- Service proposals and contracts
- Memorandums of Understanding (MOUs) and articulation agreements

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.

- FLVS has detailed and thorough procedures for accounting, budgeting, financial reporting and procurement to ensure the efficient cash management of its CTE grant funds.
- Grant funded purchases are reviewed by the Entitlement Grant Administrator prior to the requisition being submitted to the Director of Instruction for final approval. FLVS has established purchasing thresholds that ensure the proper chain of authorization based on the dollar value of a purchase.
- FLVS does not use federal Perkins V grant funds for personnel expenditures. No employee time and effort reports were verified as a part of this desk monitoring review.


- The CTE budget team and administrative staff host regular reconciliation meetings to review budget expenditures and upcoming expenses. These meetings allow for reallocation of funds, via amendment, if the opportunity exists.
- Financial and accounting records are maintained for a minimum of five years.

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.

- FLVS 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:
 - Polk State College
 - University of Central Florida
 - Florida Farm Bureau

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1.  Corrective Action Plan – FLVS is required to complete a CTE 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 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 FLVS virtual desk monitoring review. Special thanks is offered to Ms. Jenny McDonough for her participation and leadership during this process.

APPENDIX A

Florida Virtual School
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: FLORIDA VIRTUAL SCHOOL					
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	1	<u>X8</u>	8
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins 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 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	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	1	<u>X 4</u>	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					102

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

APPENDIX B

Florida Virtual School
Resolution 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. This is in violation of UGG 2 CFR 200.328 “Monitoring and reporting program performance.”</p>	<p>Corrective Action B1: (1) Additional training shall be conducted on what qualifies for earned OCPs. All instructors and administrative staff involved in the collection and verification of student level data shall be included in this training. (2) FLVS will be required to draft and submit a memo of attestation stating their intentions to provide such training. This memo shall include: the date(s) of the training; the individual(s) responsible for conducting the training; the names and titles of those individuals to be involved in the training; what training instruments will be used; and the signature of the Entitlement Grant Administrator.</p>	<p>A training will be held on January 22, 2021 to include the following staff: Elizabeth Gagne, Full-time School Operations Administrator; Sandra Blessin, FTE Administrator; Amy Heflin, Senior Manager, Curriculum; Katie Santana, Full-time Director of Instruction; CTE Coordinator (to be hired) and Jenny McDonough, Entitlement Grant Manager.</p> <p>Russell Driesen, the CTE Curriculum Manager will facilitate the training using DOE Occupational Completion Points Data Reporting Training Module documentation and the Occupational Completion Points Data Reporting Overview companion slide notes</p>	<p>Jan. 30, 2021</p>

<p>Plan submitted by (name and title): Jenny McDonough, Entitlement Grant Manager Date: 8/21/2020</p> <p>Plan accepted by: Michael Swift Date: 8/27/2020</p>	
<p>Status of Action Plan (to be completed by FDOE staff): Complete</p>	
<p>Date: n/a</p>	<p>Status of Plan Completion: Complete</p>