



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Glades County District School Board

October 19 – October 23, 2020

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Glades County District School Board
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 QAC 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 Glades County District School Board (GCDSB) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Ms. Kim Jordan, superintendent, Glades County District School Board on August 28, 2020. The designated representative for the agency was Mr. Jamie Brown.

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

V. Glades County District School Board

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 324

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> |
|-----------------------|---------------------|---------------------|-------------------|
| Perkins CTE Secondary | 220-1619B-9CS01 | \$ 22,738.00 | \$ 3,416.77 |
| Rural | 220-1619B-9CR01 | \$ 37,010.00 | \$ 228.37 |

FY 2019-20

| <u>Grants</u> | <u>Grant Number</u> | <u>Grant Amount</u> | <u>Unexpended</u> |
|-----------------------|---------------------|---------------------|-------------------|
| Perkins CTE Secondary | 220-1610B-0CS01 | \$ 23,034.00 | \$ 979.50 |
| Rural | 220-1610B-0CR01 | \$ 33,448.74 | \$ 159.74 |

FY 2020-21**

| <u>Grants</u> | <u>Grant Number</u> | <u>Grant Amount</u> | <u>Unexpended</u> |
|-----------------------|---------------------|---------------------|-------------------|
| Perkins CTE Secondary | N/A | N/A | N/A |

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

**Final award not available at time of this writing.

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

www.gladesedu.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 VDMR process.

Entrance and Exit Conferences

An introductory teleconference for GCDSB was conducted on October 19, 2020. The exit teleconference was conducted on October 23, 2020. The participants are listed below:

| Name | Title | Entrance Conference | Exit Conference |
|-----------------------------|-------------------------------|---------------------|-----------------|
| Jamie Brown | Director | X | X |
| FDOE Monitoring Team | | | |
| Charles Davis | Program Specialist, QAC, FDOE | X | X |
| Michael Swift | Program Specialist, QAC, FDOE | X | X |

Interviews

GCDSB 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 grants for GCDSB are managed by Jamie Brown.
- GCDSB worked with numerous stakeholders to assist in the creation of the district's comprehensive local needs assessment (CLNA). Those stakeholders included local employers, government officials, agencies and community service organizations that work with populations of need, economic development entities, industry associations, secondary schools offering CTE, and any other identifiable groups that serve special populations or underserved populations, be they traditional age students or older adults.
- GCDSB offers ample opportunities for staff training and professional development. CTE administrative staff and instructors participate in annual trainings within their program areas, and FDOE sponsored training events and webinars are also attended.

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.

- GCDSB is currently using Skyward® for all data collection, entry, and reporting.
- All of the data elements required of their local MIS were included in the system and verified during the desk review.
- GCDSB has internal controls and policies 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 CTE directors regularly meet with their administrative staff to discuss trends within data reports. These meetings help to ensure that the objectives of all grants are being met.
- All student level data was made available to the FDOE monitoring staff during the VDMR.
 - Industry Certifications Completion.
 - Student Transcripts

- C. **CURRICULUM AND INSTRUCTION:** refers to those elements that contribute to student learning and skill acquisition.
- The GCDSB offers career and technical programs, including career academies wherein students may earn industry certifications.
 - Moore Haven Middle-High School currently offers a Business Academy and Agri-tech Academy.
 - No reasonable services and accommodations are denied to those students who self-declare a disability.
 - The three central elements of a career academy are a small learning community, a college-prep curriculum, and partnership with employers, the community, and higher education.
- 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.
 - GCDSB 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.
 - CTE student data review
 - Student progression plans

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.

- GCDSB has financial policies and procedures in place to ensure the efficient cash management of CTE grant funds.
- Skyward® is the accounting system. The system allows for shared knowledge of expenditures and real time financial activity.
- GCDSB has detailed and thorough procedures for the procurement of equipment and inventory that is funded by its federal grants. There is a chain of approval and oversight from different departments involved in every transaction. All transactions are approved by the Purchasing department.
- GCDSB has numerous checks and balances to ensure accurate accounting records. Bookkeepers and accounting specialists work with program directors to keep track of all grant funded expenditures.
- Budget and financial reports help to determine a grants current financial standing, and the likelihood of achieving a grants financial goal. Budget amendments are submitted to FDOE if the opportunity arises.
- Monitoring staff conducted a budget analysis of GCDSB’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 reports) to include the following:
 - Expenditures in several object codes (350; 360; 510 and 730) 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 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.

- GCDSB has an Articulation Agreement with Florida Southwestern State College.
- GCDSB has MOU’s with Immokalee Technical College and Career Source Southwest Florida.

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – GCDSB is required to complete a CTE 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 Glades County District School Board virtual desk monitoring review. Special thanks is offered to Mr. Jamie Brown for his participation and leadership during this process.

APPENDIX A

Glades County District School Board
Career and Technical Education
Risk Matrix

| Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants | | | | | |
|-------------------------------------------------------------------------------------------------------------------|-----------------|--------------------|------------------------|--------------------|----------------------------|
| Agency Name: GLADES COUNTY DISTRICT SCHOOL BOARD | | | | | |
| 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 | 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 | 3 | <u>X 8</u> | 24 |
| | 3 | 5 | | | |
| | 2 | 3 | | | |
| | 1 | 1 | | | |
| Change in Management Information Systems (MIS) from Previous Fiscal Year | Yes | 7 | 7 | <u>X 6</u> | 42 |
| | 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 | 5 | <u>X 4</u> | 20 |
| | Upper Middle | 5 | | | |
| | Lower Middle | 3 | | | |
| | Lower Quartile | 1 | | | |
| | 0 | 0 | | | |
| AGENCY RISK SCORE: | | | | | 176 |

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

APPENDIX B

Glades County District School Board
Corrective Action Plan

| Finding | Corrective Action | Agency Response | Projected Date of Completion |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------------|
| <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>2/2/2021</p> | <p>N/A</p> |
| <p>Plan submitted by (name and title): Brian Greseth, Director – CTE Date: February 2, 2021</p> <p>Plan accepted by: Brian Greseth, Director – CTE Date: February 2, 2021</p> | | | |
| <p>Status of Action Plan (to be completed by FDOE staff): Complete</p> | | | |
| <p>Date: 2/2/2021</p> | | | |