

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

School District of Hamilton County

**April 12 - 16, 2021** 

Final Report

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### Florida Department of Education Division of Career and Adult Education

# School District of Hamilton County 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 the School District of Hamilton County (SDHC) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Ms. Dorothy Lee Wetherington-Zamora, superintendent, School District of Hamilton County on December 1, 2020. The designated representative for the agency was Ms. Leslie Carter.

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

#### V. SCHOOL DISTRICT OF HAMILTON COUNTY

#### **ENROLLMENT:**

#### Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 442

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

#### Finance FY 2018-19

r 1 2010-17			
<u>Grants</u>	Grant Number	<b>Grant Amount</b>	<u>Unexpended</u>
Perkins Secondary	240-1619B-9CS01	\$ 32,839.00	\$ 3,631.86
Perkins Rural	240-1619B-9CR01	\$ 18,422.00	\$ 1,332.90
FY 2019-20			
Grants	Grant Number	Grant Amount	Unexpended
Perkins Secondary	240-1610B-0CS01	\$ 36,118.00	\$ 0.00
Perkins Rural	240-1610B-0CR01	\$ 18,303.00	\$ 1.00
FY 2020-21*			
Grants	Grant Number	Grant Amount	Unexpended
Perkins Secondary	240-1611B-1CS01	\$ 31,920.00	\$ N/A
Perkins Rural	240-1611B-1CR01	\$ 41,665.00	\$ N/A

<sup>\*</sup> 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: <a href="https://www.hamiltonfl.com/">https://www.hamiltonfl.com/</a>

#### 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 SDHC was conducted on April 12, 2021. The exit teleconference was conducted on April 16, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Leslie Carter	Hamilton County CTE Coordinator	X	X
Marjorie Cooks	Hamilton County Middle/High School Vice Principal	X	X
Scott Connelly	Hamilton County Middle School Counselor	X	
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	X	X
Charles Davis	Program Specialist, QAC, FDOE	X	X
Orion Price	Program Specialist, QAC, FDOE	X	X

#### Interviews

SDHC 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.
  - The CTE coordinator is responsible for the management of the district's Perkins grants (rural and secondary). Prior to drafting the grant applications and submitting them to FDOE, the coordinator receives input from the finance director, principal, and CTE teachers, but she is the primary custodian of the grants.
  - SDHC consulted with multiple stakeholders to complete their comprehensive local needs assessment (CLNA). Those stakeholders included: the Career Pathways Consortium; North Florida Community College (NFCC); RiverOak Technical College (RTC); CareerSource North Florida; teachers, parents; and representatives from the local workforce.
  - Ongoing program viability reviews were already being performed prior to the requirement of the CLNA, and the final outcome of the CLNA was in alignment with their previous reviews and program determinations.
  - Regular meetings are held between the CTE coordinator and Finance director to ensure that programmatic and financial goals are being met.

- **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.
  - SDHC utilizes the Skyward® system as their integrated management information system (MIS).
  - The district attends all FDOE sponsoring data training events and webinars. The information learned at these training events is then disseminated to all appropriate administrators and personnel during local training events within the district.
  - End of the year surveys are given to all teachers to determine the training needs for the upcoming year. Professional development and requested trainings are then held locally throughout the district.
  - The SDHC CTE coordinator ensures that all student level data attained from teachers is accurate before entry into their MIS, and once no errors are detected the data is then submitted to FDOE. Any error reports received from FDOE are validated, corrected and then re-submitted to the state.
  - All of the data elements required of their local MIS were included in the system and verified during the desk review.
  - Student electronic files include "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA).
  - SDHC has policies, procedures and job aids to assist data entry personnel with interpreting, reconciling and entering student records into the MIS.
  - Samples of CTE student data were reviewed and verified for accuracy as part of the VDMR. No errors were found. All student records were provided by SDHC.
- **C.** <u>CURRICULUM AND INSTRUCTION:</u> refers to those elements that contribute to student learning and skill acquisition.
  - SDHC offers CTE courses for all eligible students throughout the district. The district's aim is to introduce students to CTE as early as middle school.
  - As a result of program viability reviews and their CLNA, the district recognized a need to introduce an e-Commerce program and an additional need to build upon their biotechnology program. Conversely, it was determined that the digital design program would be phased out in favor of programs that would better prepare students for postsecondary education or entry into the workforce upon graduation.
  - The majority of SDHC CTE programs are well represented by non-traditional students. The same goes for non-traditional teachers.
  - Very little teacher and staff turnover allows for students and teachers to build healthy relationships as they matriculate through a program. This also allows teachers to gain a better understanding of the needs of their students.
  - SDHC offers CTE students the opportunity to participate in dual enrollment opportunities
    with RTC, NFCC and Tallahassee Community College. Students also participate in career
    and technical student organizations (CTSO) such as Future Farmers of America and Future
    Business Leaders of America.
  - CTE administrators and instructors participate in ongoing trainings provided by the state, as well as annual professional development through the district. Guidance counselors are also included in CTE specific training.
  - No reasonable services and accommodations are denied to those students who self-declare a disability.
  - The CLNA advisory committee will provide ongoing consultation to CTE administrators on how to continually increase the impact and outreach of their programs. CTE program viability reviews will also continue on an annual basis.

- **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 EDGAR and the UGG is 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 disposal of old inventory.
  - The assistant principal is the property custodian at each school and leads the district's annual inventory review for their particular campus.
  - There have been no reports of stolen or lost equipment over the previous three fiscal years.
  - Although no onsite visits took place over the course of the VDMR, equipment and inventory were verified via samples of procurement records and pictures.
- **E.** <u>ACCESS AND EQUITY:</u> 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
  - MIS training aids
  - District policies and procedures for finance and procurement
  - District technology plan
  - Student and employee handbooks
  - Inventory records and pictures
  - Procurement records
  - Memorandums of Understanding (MOUs) and articulation agreements
  - Advisory committee records agendas, sign in sheets, etc.
  - CTE student data review
- **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.
  - Skyward® is used as the district's Enterprise Resource Planning (ERP) system.
  - The district has financial policies and procedures in place to ensure the efficient management of CTE grant funds. The district procurement manual was also submitted as part of the VDMR.
  - Procurement of grant funded items goes through a thorough approval process that includes: the CTE coordinator; the finance director; and is ultimately approved by the district

- superintendent. All purchases above \$35K must be approved by the district Board of Directors.
- Monetary expenditures written into the Perkins grant are determined by the CLNA, advisory board recommendations, teacher recommendations and program needs. The CTE coordinator conducts monthly finance reviews to determine if an opportunity to re-direct funds, via grant amendment, is possible.
- **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.
  - SDHC 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:
    - CareerSource North Florida
    - o RiverOak Technical College
    - o North Florida Community College
    - o Big Bend Technical College
    - o Florida Gateway College

#### VIII. REQUIRED RESOLUTION ACTIVITIES

#### CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – SDHC is not 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: <a href="http://fldoe.org/academics/career-adult-edu/compliance">http://fldoe.org/academics/career-adult-edu/compliance</a>.

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 School District of Hamilton County virtual desk monitoring review. Special thanks is offered to Ms. Leslie Carter for her participation and leadership during this process.

#### APPENDIX A

#### School District of Hamilton County Career and Technical Education Risk Matrix

## Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants

Agency Name: SCHOOL DISTRICT OF HAMILTON COUNTY

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	7 or More Years	7			70
	5-6	5	7	V 10	
Monitored	3-4	3	7	<u>X 10</u>	
	0-2	1			
	Upper Quartile	7		<u>X8</u>	8
<b>Total Budget for all Perkins</b>	Upper Middle	5	1		
<b>Grants Combined</b>	Lower Middle	3	1		
	Lower Quartile	1			
	4 or More	7		<u>X 8</u>	24
N I CD I C	3	5	1		
Number of Perkins Grants	2	3	3		
	1	1			
Change in Management Information Systems (MIS)	Yes	7	0	<u>X 6</u>	0
from Previous Fiscal Year	No	0			
Agency CTE Program Director Change from Previous Fiscal	Yes	7	7	<u>X 6</u>	42
Year	No	0			
	Upper Quartile	7			
Unexpended Funds from all	Upper Middle	5			
Perkins Grants Combined	Lower Middle	3	3	<u>X 4</u>	12
Terkins Grants Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7			12
Number of Findings from the	Upper Middle	5			
Office of the Auditor General	Lower Middle	3	3 <u>X</u> 4	<u>X 4</u>	
Office of the Auditor General	Lower Quartile	1			
	0	0			
			AGENCY RISK	SCORE:	168

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