



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Lafayette District Schools

August 28, 2020

Final Report

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**Lafayette District Schools
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 2020-21 Core Monitoring Guide, which is posted to the Department's website at <https://www.fldoe.org/academics/career-adult-edu/compliance/>.

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.

V. 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 Lafayette District Schools (LDS) was determined to be an onsite monitoring review. However, due to limitations caused by the COVID-19 pandemic, the strategy was changed to a virtual desk monitoring review. A notification was sent to Mr. Robert Edwards, superintendent, Lafayette Districts Schools on December 17, 2019. The designated representatives for the agency were Ms. Paula Ginn, CTE/AE Director/ Assistant Principal.

The desk monitoring review was initially scheduled to be an onsite visit from March 23-25, 2020, but due to the COVID-19 pandemic, the provider was rescheduled and given a due date of August 28, 2020. The representative for the division present during the desk monitoring review was the director, Mrs. Kara Kearce of the Quality Assurance and Compliance section.

V. LAFAYETTE DISTRICT SCHOOLS

ENROLLMENT:

Fiscal Year (FY) 2017-18

AE: 18
 CTE (possible duplication at the program level): Secondary- 813

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>
Adult General Education	340-1918B-8CG03	\$ 38,240.00	\$ 4,497.84
Perkins CTE Rural	340-1618A-8CR01	\$ 16,628.00	\$ 0.00
Perkins CTE Secondary	340-1618A-8CS01	\$ 3,834.00	\$ 0.00

FY 2018-19

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	340-1919B-9CG01	\$ 38,240.00	\$ 0.00
Perkins CTE Rural	340-1619B-9CR01	\$ 16,358.00	\$ 0.00
Perkins CTE Secondary	340-1619B-9CS01	\$ 16,783.00	\$ 0.00

FY 2019-20

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	340-1910B-0CG01	\$ 38,240.00	\$ 0.00
Perkins CTE Rural	340-1610B-0CR01	\$ 16,321.00	\$ 10,228.70
Perkins CTE Secondary	340-1610B-0CS01	\$ 18,321.00	\$ 2,207.57

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

<https://www.lafayette.k12.fl.us/>

VI. MONITORING ACTIVITIES

The monitoring activities included pre and post-visit planning, an entrance and exit conference, records review and administrators' interviews when necessary.

Onsite Visits

No onsite visits were made during the desk monitoring process.

Name	Title	Entrance Conference	Exit Conference
Paula Ginn	CTE & AE Director	X	X
FDOE Monitoring Team			
Kara Kearce	Director, QAC, FDOE	X	X

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 reviewed and discussed at various times during the visit.

VII. RESULTS

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

- Due to the district's small size, their CTE and AE grants are managed by a single person who has multiple years of experience in both program areas.
- There is a separation of duties between the administrative side of grant management and the programmatic side, but program administrators are involved in all aspects of their program management in areas such as finance, data and assessment, and inventory management.
- Grant applications go through a multi-step process of review and approval. Staff at the instructor level to the director level are involved in ensuring needs are met and coordination achieved.
- The district has a grant-specific section that ensures grant applications are completed correctly and timely. No issues have been reported with the grant application or amendment process.
- FDOE sponsored training events are attended as required, and local training is conducted annually for program and administrative staff.

- 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.
- The district uses the Skyward® system as its integrated management information system. All the data elements required by the National Reporting System were included in the system and verified during the monitoring review.
 - There is a multi-tiered review/verification process that takes place before submitting student data to FDOE. If any data errors are reported, there are multiple points of contact at the local school level to assist with correcting erroneous data.
 - Student and program data is utilized for program management and improvement. These data reviews help gauge the likelihood of achieving district and program goals.
 - Student records were reviewed for verification of Industry certifications, district AGE student completers and non-completers.
- C. CURRICULUM AND INSTRUCTION:** refers to those elements that contribute to student learning and skill acquisition.
- The Advisory Board supports the CTE programs. The Advisory Board offers insight on current industry trends, current job outlooks and recommendations for industry-specific equipment needs.
 - CTE students are active within their respective Career Technical School organizations and participate in state and regional competitions.
 - The district has agreements that provide students with job training opportunities such as job shadowing and a summer study available with some of the local business partners.
 - LDS provides CTE students the opportunity to gain postsecondary credit while attending high school by establishing articulating agreements with the area colleges and technical colleges.
 - LDS teachers are required to earn the same certifications as their students.
 - LDS continues to focus on strengthening foundational skills while working to ensure students are college and career-ready. They believe that strengthening the foundational skills will increase the rates of learning success at all levels.
- 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 equipment over \$1000 is assigned an asset identification profile within the Skyward® system. This information is used for tracking inventory by the property management department during the annual county-wide inventory.
 - Equipment is transferred to the area specified by management and district personnel transfer ownership in the Skyward® system for that equipment. Board approval must be received before any transfer or disposal of equipment.
 - LDS has a Technology Plan that includes policies on purchasing new computers and other technology-related items. This plan ensures that any piece of technology-related equipment bought by the district can be supported through the MIS/IT.

- 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. Samples of financial and programmatic records are reviewed.
- Sample advisory committee minutes, agendas and sign-in sheets
 - District procurement/purchasing records
 - Size, scope and quality checklist review
 - MIS data quality checklists
 - District policies and procedures for finance and procurement
 - Lafayette data resources
 - Student and employee handbooks
 - Policies and procedures on inventory/equipment management
 - Student data records
 - Internal control policies
 - Policies on dual enrollment
 - Memorandums of Understanding (MOUs) and articulation agreements
 - Inventory records for all grant-funded equipment purchases
- 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.
- LDS has financial policies, procedures, and internal controls in place to ensure the efficient cash management of CTE and AE.
 - Skyward® is used for grant management and to track expenditures. Staff review grant expenditures regularly.
 - The district has precise and thorough procedures for procuring equipment and inventory funded by its federal grants.
 - Within the Skyward® system, grants are given specific parameters based on allowable costs that can be charged towards a grant. PeopleSoft will automatically assign a chain of review based on a purchase's monetary level before those funds are approved and released for expenditures.
 - The monitoring team reviewed multiple financial records for compliance, including grant-funded employee time and effort certifications and purchasing and procurement records. All were in compliance with federal, state and local regulations.
 - Monitoring staff conducted a budget analysis of LDS FDOE grants. Upon review, the following non-compliance findings were discovered:
 - (G1): Significant changes to the original approved grant budget were completed without submitting a required budget amendment. Funds were moved from approved object codes and overspent on other object code - CTE Secondary 2017-

18 (object codes 120; 330 and 730 overspent), CTE Secondary 2018-19 (object codes 330; 520 and 751 overspent), CTE Secondary 2019-20 (object codes 330; 511 and 730 overspent), CTE Rural 2017-18 (object codes 120; 330; 730 and 751 overspent), CTE Rural 2018-19 (object codes 330 and 590 overspent), 2017-18 AGE (object codes 130; 520 and 590 overspent) 2018-19 AGE (object codes 120; 210; 220; 221 and 511 overspent) 2019-20 AGE (object codes 120; 210; 221; 511 and 730 overspent). These changes in the budget does not reflect the original budget's intent and is considered a complete change in scope.

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: 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.

- Big Bend Technical College
- Riveroak Technical College
- North Florida College
- NEFEC (Northeast Florida Educational Consortium)
- NFCPC (North Florida Career Pathways Consortium)
- Embry Riddle Aeronautical University
- SVYLSS (Suwannee Valley Youth Livestock Show and Sale)
- NFLSS, Inc. (North Florida Livestock Show and Sale, Inc)
- Lafayette County Elected Officials
- Lafayette County Farm Bureau
- Perry Animal Hospital

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – LDS is required to complete a CTE Corrective Action Plan.

ADULT EDUCATION

1. Corrective Action Plan – LDS is not required to complete an AE Corrective Action Plan.

IX. SUMMARY

Once the fieldwork is completed, including receipt of the 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's 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 Lafayette District Schools virtual monitoring review participants. Special thanks are offered to Mrs. Paula Ginn for her participation and leadership during this process.

APPENDIX A

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: LAFAYETTE DISTRICT SCHOOLS					
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	3	<u>X 8</u>	24
	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	7	<u>X 6</u>	42
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	0	<u>X 4</u>	0
	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:					148

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

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

Agency Name: LAFAYETTE DISTRICT SCHOOLS

Program Type: AE

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>X10</u>	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	1	<u>X 8</u>	8
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education 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	7	<u>X 6</u>	42
	No	0			
Unexpended Funds from all Adult Education 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			
Adult Education Program Improvement Plan (AEPIP)	Target Not Met on 3 of 3 Indicators	5	3	<u>X 6</u>	18
	Target Not Met on 2 of 3 Indicators	3			
	Target Not Met on 1 of 3 Indicators	1			
	All targets met	0			
Agency Risk Score					162

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

APPENDIX B

LAFAYETTE DISTRICT SCHOOLS
Required Action Plan

Finding	Required 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>G1: The CTE director shall provide a memo of attestation stating the district acknowledges the finding. No other action is required.</p>	<p>Memo submitted on April 20, 2021</p>	<p>April 20, 2021</p>
<p>Plan submitted by (name and title): Paula Ginn Assistant Principal/CTE Director</p>		<p>Date: April 20, 2021</p>	
<p>Plan accepted by: Kara Kearce</p>		<p>Date: April 20, 2021</p>	
<p>Status of Action Plan (to be completed by FDOE staff): Complete</p>			
<p>Date: April 29, 2021</p>		<p>Status of Plan Completion: Complete</p>	