



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

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

**Monroe County School District**

**April 5 – 9, 2021**

**Final Report**

TABLE OF CONTENTS

I. Introduction ..... 1

II. Authority ..... 1

III. Quality Assurance Policies, Procedures, and Protocols ..... 1

IV. Provider Selection ..... 1

V. Monroe County School District ..... 2

VI. Monitoring Activities ..... 3

VII. Results ..... 3

VIII. Required Resolution Activities ..... 6

IX. Summary ..... 6

Appendix A ..... 7

**Monroe 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 located on 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.

**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 Monroe County School District (MCSD) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Ms. Theresa Axford, superintendent, Monroe County School District on December 1, 2020. The designated representative for the agency was Mrs. Sibba Mira, director, Career and Technical Education and Mr. Trevor Tyler, director, Adult Education.

The representative of the division conducting the VDMR was program specialist Mr. Orion Price of the Quality Assurance and Compliance section.

**V. MONROE COUNTY SCHOOL DISTRICT**

**ENROLLMENT:**

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 3,515

AE: 174

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	440-1919B-9CG01	\$ 113,251.00	\$ 59,777.00
Perkins Secondary	440-1619B-9CS01	\$ 79,526.00	\$ 10,820.85

**FY 2019-20**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	440-1910B-0CG01	\$ 54,720.00	\$ 5,017.47
Perkins Secondary	440-1610B-0CS01	\$ 80,894.00	\$ 3,655.74

**FY 2020-21\***

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	440-1911B-1CG01	\$ 54,720.00	\$ N/A
Perkins Secondary	440-1611B-1CS01	\$ 22,827.00	\$ 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.keysschools.com/>

## 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 MCSD was conducted on April 5, 2021. The exit teleconference was conducted on April 9, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Trevor Tyler	Director AE	X	X
Nancy Oleinik	Finance Director	X	X
Sibba Mira	Director CTE	X	X
<b>FDOE Monitoring Team</b>			
Orion Price	Program Specialist, QAC, FDOE	X	X
Charles Davis	Director, QAC, FDOE	X	X

### Interviews

MCSD 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.

- Sibba Mira manages the CTE grants for MCSD. Trevor Tyler manages the AE grants for MCSD.
- MCSD has established policies and procedures required with all approval processes before submitting any grant application to FDOE.
- The AE and CTE directors work separately with their financial director, superintendent, advisory committees and district finance staff to ensure that the needs of their respective programs are met. Once those needs are addressed and included in the grant applications, they are reviewed and approved by the superintendent before being submitted to the FDOE.
- Once approved by FDOE, the AE and CTE grants for MCSD are distributed by Mr. Tyler and Mrs. Mira, but all program areas follow the same financial tracking and oversight procedures.
- The comprehensive local needs assessment (CLNA) included in the MCSD Perkins grants required consultation with numerous community and business leaders. These stakeholders include teachers; local business owners; community leaders; and other educational specialists that all meet annually.
- MCSD offers ample opportunities for district-wide training and professional development. AE and CTE administrative staff participate in annual conferences within their program areas, while FDOE sponsored webinars and training events, such as the Florida Association of Career and Technical Education (FACTE), and Adult and Community Education (ACE), conference are 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.

- MCSD utilizes the FOCUS® system for the student information system (SIS) and management information system (MIS).
- Trainings are provided for staff for the National Reporting System requirements (AE only), data collection procedures, data entry and all other areas of the MIS. Administrative staff also participate in FDOE trainings.
- All of the data elements required of their local MIS were included in the MIS system screenshots and verified during the VDMR.
- MCSD's registration forms include student "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA) and included a registration form as evidence.
- Program staff verifies student data prior to the records being uploaded to the SIS. Data is then manually entered within the SIS to ensure accuracy prior to submission to the state.
- The district has internal controls that ensure each individual has access to a specific part of the MIS needed to complete tasks to prevent too many people from being able to view sensitive student data. This also acts as a check and balance for accuracy.
- Samples of AE and CTE student data was reviewed and verified for accuracy as part of the VDMR. MCSD provided all student records and all were reviewed as accurate.

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

- The district provides resources such as CareerSource, working with local Colleges, and certifications available for a multitude of careers required/needed in CLNA.
- No reasonable services and accommodations are denied to those students who self-declare a disability. Disabled students are referred to as exceptional and MCSD has a comprehensive policy and procedure to identify and cater to needs. The exceptional student progression guidelines were submitted as evidence.
- CTE students have the opportunity to participate in multiple Career and Technical Student Organizations (CTSO), internships and other work-based learning.
- AE instructors are trained to incorporate CTE skills and related content into daily classroom instruction.
- MCSD has a program they refer to as seed planters that directly benefits the CTE programs. This is an introductory course for younger students (middle school) to explore and get familiar with future job markets. This allows students a preview into offered programs at the high school level and interests them to be more apt to taking courses when in high school. Ms. Mira is in the process of streamlining the program to suit the needs of younger students.
- The district has a memorandum of understanding (MOU) with CareerSource along with some articulation agreements with local colleges to provide career services and training for students.
- AE and CTE are currently separate programs within MCSD; however, Mr. Tyler and Ms. Mira work directly to ensure students can work on AE then join CTE programs of interest if applicable for students who fall within parameters of the district CTE program.
- Tests of adult basic education (TABE) are 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 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.
  - The district 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 (OEEEO) for school districts 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.
- 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.
  - 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.
- MCSD has financial policies and procedures that ensure efficient management of CTE and AE grant funds that filter through multiple school board members and department heads.
  - MCSD has detailed and thorough procedures for procuring equipment and inventory funded by its federal grants. The approval process is very consistent with MCSD being so small, as all purchases must receive final approval from the district Board of Directors and superintendent before being finalized.
  - Program directors and administrative staff meet monthly to review expenditure reports and to determine a grant's current financial standing. Budget amendments are submitted to FDOE quarterly when applicable. The financial director works directly with the personnel directors and superintendent on all financial matters within the school district.
  - MCSD has a firm understanding that object codes on original grants needing to match the DOE 399/499 forms. When the Quality Assurance Program Specialist completed the Grant Budget Analysis, there were no deviations from the original grant without amendments submitted.

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

- MCSD has limited collaborations and/or MOUs within the local community. They often offer additional educational and job experiences to students within the district. The current partner is but not limited to:
  - CareerSource South Florida

## **VIII. REQUIRED RESOLUTION ACTIVITIES**

### **CAREER AND TECHNICAL EDUCATION**

1. Corrective Action Plan – MCSD is not required to complete a CTE Corrective Action Plan.

### **ADULT EDUCATION**

1. Corrective Action Plan – MCSD is not 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 Monroe County School District virtual desk monitoring review. Special thanks is offered to Trevor Tyler and Sibba Mira for their participation and leadership during this process.



**APPENDIX A**

Monroe 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>MONROE 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>X 10</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>1</b>	<u>X8</u>	<b>8</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Perkins 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 CTE Program Director Change from Previous Fiscal Year</b>	Yes	7	<b>7</b>	<u>X 6</u>	<b>42</b>
	No	0			
<b>Unexpended Funds from all Perkins Grants Combined</b>	Upper Quartile	7	<b>5</b>	<u>X 4</u>	<b>20</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>5</b>	<u>X 4</u>	<b>20</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>AGENCY RISK SCORE:</b>					<b>168</b>

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

Monroe County School District  
Adult Education  
Risk Matrix

<b>Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants</b>					
Agency Name: <b>MONROE COUNTY SCHOOL DISTRICT</b>					
Program Type: <b>AE</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>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>3</b>	<u>X 8</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>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>7</b>	<u>X 4</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>5</b>	<u>X 4</u>	<b>20</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>196</b>

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