



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Okaloosa County School Board

November 2 – November 6, 2020

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Okaloosa County 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 Okaloosa County School Board (OCSB) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Marcus Chambers, superintendent, Okaloosa County School Board on August 28, 2020. The designated representative for the agency was Ms. April Branscome.

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

V. OKALOOSA COUNTY SCHOOL BOARD

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 8,865

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	460-1619B-9CS01	\$ 282,673.00	\$ 5,833.50

FY 2019-20

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Secondary	460-1610B-0CS01	\$ 304,798.00	\$ 6,522.26

FY 2020-21**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Secondary	460-1611B-1CS01	\$ N/A	\$ N/A

** Grant applications not approved at the time of this writing.

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

<https://www.okaloosaschools.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 OCSB was conducted on November 2, 2020. The exit teleconference was conducted on November 6, 2020. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
April Branscome	Director	X	X
FDOE Monitoring Team			
Charles Davis	Program Specialist, QAC, FDOE	X	X
Michael Swift	Program Specialist, QAC, FDOE	X	X

Interviews

OCSB 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 OCSB are managed by April Branscome.
- OCSB worked with numerous stakeholders to assist in the creation of the district’s comprehensive local needs assessment (CLNA). Those stakeholders also serve as an advisory committee.
- The committee includes representatives from OCSB, industry, and post secondary.
- OCSB offers ample opportunities for district-wide 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.
- All CTE instructors (state and district certified) are required to earn 120 professional development points to recertify every five years.

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.

- OCSB is currently using the AS 400 management information system (MIS).
- All of the data elements required of their local MIS were included in the system and verified during the desk review.
- The district has internal controls 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

- C. **CURRICULUM AND INSTRUCTION:** refers to those elements that contribute to student learning and skill acquisition.
- OCSB offers 20 CTE programs across 14 sites throughout the county.
 - The district uses media outlets, radio and newspaper, as well as social media and printed signs to recruit students.
 - OCSB has a designated Career Recruiter.
 - CTE programs are open to all eligible high school and middle school students in the district and are committed to a policy of nondiscrimination in employment and educational opportunity.
 - CTE students have the opportunity to participate in multiple Career and Technical Student Organizations (CTSO), as well as other clubs and groups throughout the district.
- 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.
 - 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.

- The district has financial policies and procedures in place to ensure the efficient cash management of CTE grant funds.
- AS400 is the district cost accounting system. The system allows for shared knowledge of expenditures and real time financial activity.
- The district has detailed and thorough procedures for the procurement of equipment and inventory that is funded by its federal grants.
- Purchase request are submitted to Nancy Takacs in the CTE office.
- OCSB 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 goals. Budget amendments are submitted to FDOE if the opportunity arises.
- Monitoring staff conducted a budget analysis of OCSB’s FDOE grants. Upon review, the following non-compliance findings were discovered:
 - (G1): CTE 2018-19 budget narrative which resulted in the DOE399 (final expenditure report) to include the following:
 - Expenditures in object code (365) was 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.

- OCSB 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 include, but are not limited to: Okaloosa County Chamber of Commerce and CareerSource Okaloosa/Walton.
- OCSB has an articulation agreement with Northwest Florida State College and Embry Riddle Aeronautical University.

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – OCSB 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 Okaloosa County School Board virtual desk monitoring review. Special thanks is offered to Ms. April Branscome for her participation and leadership during this process.

APPENDIX A

Okaloosa County 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: Okaloosa 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	5	<u>X8</u>	40
	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	5	<u>X 4</u>	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					208

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

APPENDIX B

Okaloosa County 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>2/10/2021</p>	<p>N/A</p>
<p>Plan submitted by (name and title): April Branscome, Director – Career & Technical Education Date: February 10, 2021</p> <p>Plan accepted by: April Branscome, Director – Career & Technical Education Date: February 10, 2021</p>			
<p>Status of Action Plan (to be completed by FDOE staff): Complete</p>			
<p>Date: 2/10/2021</p>		<p>Status of Plan Completion: Complete</p>	