



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Pasco-Hernando State College

March 15 - 19, 2021

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Pasco-Hernando State College
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 Pasco-Hernando State College (PHSC) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Dr. Timothy Beard, president, Pasco-Hernando State College on December 1, 2020. The designated representative(s) for the agency was Dr. Marcia Austin.

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

V. PASCO-HERNANDO STATE COLLEGE

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Post-secondary – 10,672

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 Post-secondary	512-1619B-9CP01	\$ 554,730.00	\$ 1,836.56

FY 2019-20

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Post-secondary	512-1610B-0CP01	\$ 547,487.00	\$ 0.00

FY 2020-21*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Post-secondary	512-1611B-1CP01	\$ 332,617.00	\$ N/A

* Not all final expenditures were approved at the time of this writing.

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

<https://phsc.edu/>

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 PHSC was conducted on March 15, 2021. The exit teleconference was conducted on March 19, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Marcia Austin	Dean of Workforce Development, CTE Programs	X	X
Alysen Heil	Assistant Dean of Workforce Development, CTE Programs	X	X
Carla Rossiter-Smith	Dean of Institutional effectiveness	X	X
Billie Gabbard	Dean of Nursing and Health Science Programs	X	X
Tenille O'Conner		X	X
Scott Scurlock	Program Director – EMS	X	
Robert Trsek	Program Director – Aviation		X
Curtis Scaglione	Program Director – Information Technology		X
Janice Scott	Associate Dean of Enterprise System	X	X
Kim Molina	Comptroller	X	X
Charley May	Program Director – Public Services		X
Carol Lewis	Senior Accountant	X	X
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	X	X

Interviews

PHSC 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.
- PHSC's Perkins grants are managed by the Dean of Workforce Development, Career and Technical Education, but works closely with program directors and program advisory councils. Together they determine what programmatic needs will be addressed and included in their grant application, and are responsible for seeing that those needs are met over the course of the program year.
 - PHSC consulted with numerous local stakeholders for the creation and evaluation of their comprehensive local needs assessment (CLNA) included with their Perkins grant. Those stakeholders included, but were not limited to: CareerSource Pasco-Hernando; Pasco County School District; Hernando County School District; the Southern Regional Education Board; CTE instructors; and current students.
 - Program directors and deans meet regularly with the college budget department to ensure that grant objectives and financial goals are being met. Amendments are written and submitted to

FDOE if the opportunity arises. The goal is to have all amendments submitted to FDOE no later than February of the current program year.

- CTE administrative staff participate in annual trainings within their program areas, and attend FDOE sponsored training events and webinars.

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.

- PHSC is currently transitioning to CampusNexus® as their management information system (MIS), as well as their enterprise resource planning system (ERP).
- Policies and procedures are in place to ensure effective data collection and entry into the college's MIS. Training is also provided to those individuals who are responsible for the collection of student data and the submission of that data to FDOE.
- The new MIS gives CTE administrators real time, quantitative/qualitative data reports that will better aide in classroom and program improvement.
- All of the data elements required of their local MIS were included in the system and verified during the desk review.
- PHSC program applications include student "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA).
- PHSC administrative staff and instructors attend FDOE sponsored data webinars and conferences. Local training is also provided to all CTE staff on grant and program data requirements.

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

- PHSC offers various CTE programs at multiple locations across Pasco and Hernando Counties.
- Upon review of their completed CLNA, the CTE dean and acting stakeholders came to multiple conclusions in regards to their programs. Recommendations were made for the advancement and improvement of current programs to meet the growing local workforce needs of the region, and to meet the interest level of current students. Also, multiple programs were in the process of being discontinued prior to the completion of the CLNA, and the decision to end these programs was upheld in accordance to the results of the CLNA.
- PHSC conducts annual program viability reviews to gauge the effectiveness and programmatic outcomes of current CTE programs. These reviews delve into enrollment numbers, future enrollment numbers, job market outlook, wage potential and other facets of a particular program area.
- PHSC offers dual enrollment services to students at Hernando County School District and Pasco County School District.
- CTE students are offered multiple opportunities for curriculum engagement outside of the classroom. Nursing students work with local clinical partners to provide services to members of the community. The dental program also provides services for the local Veterans Affairs office (VA) and walk in patients. Internships are also available.
- Due to the ongoing COVID19 pandemic the college was forced to limit enrollment for classes that require in person learning. Off campus sites used for Health Science clinicals were also completely shut down until the fall of 2020.
- PHSC has written policies and procedures for working with students who self-declare a disability. Training is also available for instructors and administrators. No reasonable services and/or accommodations are denied to those students.

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.
- The district has a technology plan that includes policies on new equipment requests, equipment safety/storage and the disposal of old inventory.

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 providers 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. A sampling of financial and programmatic records is reviewed.

- Size, scope and quality review
- CLNA
- MIS data quality checklists
- CTE and other administrative job descriptions
- Inventory records
- Policies and procedures for procurement
- College technology plan
- Procurement records
- Travel records
- Financial Policies and procedures
- Memorandums of Understanding (MOUs) and articulation agreements
- Advisory committee records – agendas, sign in sheets, etc.
- Sample time and effort report
- CTE student data review
- Updated inventory records
- Financial records and grant budget analysis

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.

- PHSC is currently transitioning into the CampusNexus® ERP system. All facets of financial records and financial planning will be housed within the new ERP. This will allow for a better streamlined approach to purchasing/procurement.
- Grant managers and program directors have access to real time financial reports of their particular grants. The new ERP will also provide the opportunity to create more departmentalized finance reports for program review.
- PHSC has thorough financial policies and procedures in place to ensure the efficient cash management of CTE grant funds.

- Procurement is handled within CampusNexus® and adheres to strict purchasing thresholds established by the college. Once all requirements are met, the Executive Vice President approves the purchase and a purchase order is created.
 - Purchases from \$10,000 - \$34,999 require two or more written quotes.
 - Purchases from \$35,000 - \$64,999 require three or more written quotes.
 - Purchases over \$65,000 require a competitive sealed bid or proposal submitted by the college's purchasing department.
- Contract managers and program directors have bi-weekly meetings with administrative and finance staff to discuss the current financial standing of their grants.
- Monitoring staff conducted a budget analysis of PHSC's FDOE grants and Project Disbursement Form (DOE399) reports. Upon review, the following non-compliance findings were discovered:
 - PHSC submitted an inaccurate Project Disbursement Form (DOE399) for Fiscal Year (FY) 2018-19, Project # 512-1619B-9CP01 and Fiscal Year (FY) 2019-20, Project # 512-1610B-0CP01.
 - In both years, the DOE 399 did not match the budget narrative approved in the grant applications nor subsequent amendment(s).
 - In both years, the submitted (DOE399) included cost for non-recurring expense for Employee Awards (object code 58500).
 - Under the Cost Principles of [2 CRF Part 200.434](#) contributions and donations, monetary awards are an un-allowable expenditure.
 - This will result in the repayment of all funds associated with that un-allowable object code.

FINDING AND ACTION

- Finding G1: PHSC expended funds in a non-allowable expenditure (Monetary Award), a violation of UGG 2 CRF 200.434.
- This is also a violation of UGG 2 CFR 200.415 and FDOE Green Book, Section C- Fiscal and Program Accountability - Financial Reporting.
 - Corrective Action G1: The provider will work with FDOE's comptroller's office to correct their DOE399's. (FY) 2018-19, Project #512-1619B-9CP01, PSCH must submit a corrected DOE 399 to the comptroller's office deducting \$4,520.75 for object code 58500.
 - (FY) 2019-20, Project #512-1610B-0CP01, PSCH submitted a corrected DOE 399, deducting \$5,000 for object code 58500. The revised document was received and approved on January 11, 2021. No further action is required for 2019-20.

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.

- PHSC 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:
 - CareerSource Pasco-Hernando
 - Pasco County School District
 - Hernando County School District
 - Hernando County Board of County Commissioners
 - Pasco County Board of County Commissioners

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – PHSC 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 Pasco-Hernando State College virtual desk monitoring review. Special thanks is offered to Dr. Marcia Austin for her participation and leadership during this process.

APPENDIX A

Pasco-Hernando State College
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Colleges Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: PASCO-HERNANDO STATE COLLEGE					
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	3	<u>X 8</u>	24
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins 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	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	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					126

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

APPENDIX B

Pasco-Hernando State College
Resolution Action Plan

Findings	Corrective Actions	Resolution	Projected Date of Completion
<p>Finding G1: PHSC expended funds in a non-allowable expenditure (Monetary Award), a violation of UGG 2 CRF 200.434. This is also a violation of UGG 2 CFR 200.415 and FDOE Green Book, Section C- Fiscal and Program Accountability - Financial Reporting.</p>	<p>Corrective Action G1: The provider will work with FDOE’s comptroller’s office to correct their DOE399’s. (FY) 2018-19, Project #512-1619B-9CP01, PHSC must submit a corrected DOE 399 to the comptroller’s office deducting \$4,520.75 for object code 58500.</p> <p>(FY) 2019-20, Project #512-1610B-0CP01, PHSC submitted a corrected DOE 399, deducting \$5,000 for object code 58500. The revised document was received and approved on January 11, 2021. No further action is required for 2019-20.</p>	<p>PHSC CFO reclassified the expenditures related to salary from the award GL (585000) to the salary GL (52300, 53000, and 54000), making the longevity compensation payment an allowable expense under the Perkins grant. No cost recovery. DOE 399 amended and approved (FY) 2018-19, Project #512-1619B-9CP01.</p>	<p>6/8/2021</p>
<p>Plan submitted by (name and title): N/A Date: N/A</p> <p>Plan accepted by: N/A Date: N/A</p>			
<p>Status of Action Plan (to be completed by FDOE staff): Complete</p>			