



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Putnam County School District

April 26 - 30, 2021

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Putnam County School District
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 Putnam County School District (PCSD) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Rick Surrency, superintendent, Putnam County School District on December 1, 2020. The designated representative for the agency was Ms. Renee Hough.

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

V. PUTNAM COUNTY SCHOOL DISTRICT

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 5,215

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 Secondary	540-1619B-9CS01	\$ 189,361.00	\$ 0.00
Perkins Rural	540-1619B-9CR01	\$ 47,715.00	\$ 0.00

FY 2019-20

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	540-1610B-0CS01	\$ 230,015.00	\$ 400.83
Perkins Rural	540-1610B-0CR01	\$ 47,777.00	\$ 7,415.54

FY 2020-21*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	540-1611B-1CS01	\$ 185,902.00	\$ N/A
Perkins Rural	540-1611B-1CR01	\$ 41,496.00	\$ 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.putnamschools.org/>

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 PCSD was conducted on April 26, 2021. The exit teleconference was conducted on April 30, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Renee Hough	Director CTE	X	X
Laura France	Assistant Superintendent for Curriculum	X	X
Amanda Burney	CTE Program Specialist	X	X
Stacy Owens	Data Quality Coordinator	X	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

PCSD 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 director serves as the manager of the district's Perkins grants. Prior to drafting the grant applications the grant manager works alongside representatives from the district's finance and data offices to determine what needs can be addressed within the grant. Input is also received from CTE professional learning communities and teachers.
 - As part of the required comprehensive local needs assessment (CLNA), PCSD consulted with numerous individuals from the local workforce and education community. Those stakeholders included: CareerSource Northeast Florida; The Northeast Florida Educational Consortium (NEFEC); Putnam County Chamber of Commerce; St. Johns River State College; and CTE program leaders and teachers. Due to the COVID19 pandemic, electronic questionnaires and surveys were created and distributed to local community leaders and business owners.
 - The results of the CLNA help to further determine what program needs will be included in the CTE grant.

- Once the CTE director completes the grant application, it is then reviewed by the district’s assistant superintendent prior to submission to the state. The grant is then presented to the district school board once it has been approved by FDOE.
- Regular meetings are held between the CTE director and her secretary to ensure that programmatic and financial goals are being met. These meetings take place, at a minimum, bi-weekly.

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.

- PCSD utilizes the Skyward® system as their integrated management information system (MIS).
- CTE and data administrative staff attend all FDOE sponsored data training events and webinars. The Workforce Educational District Data Advisory Council (WEDDAC) meeting is attended regularly by the district data Reports Coordinator. The information learned at these training events is then disseminated to all appropriate administrators and personnel during local training events within the district.
- PCSD has policies and procedures in place to ensure that student data is recorded properly within the local MIS and submitted to FDOE in accordance with state reporting guidelines. Security measures are also in place to ensure that only authorized personnel has access to sensitive student data records.
- Error reports embedded within Skyward® are used to validate the local submission of student data into the MIS. Prior to each survey period, the data reports coordinator will run data verification checks before any data is submitted to the state. The system then returns an error report for each required data element that is either missing, questionable or wrong. The data reports coordinator will reach out to the appropriate school to fix the data if errors are reported.
- 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).
- 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 PCSD.
- MIS/data and assessment training is offered to all CTE teachers and administrators during the district’s annual CTE meeting.

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

- PCSD offers CTE courses to all eligible students throughout the district. Programs are available at three high schools, with dual enrollment available for those who qualify academically. Introductory courses are also offered at the middle school level.
- Beginning in the 2021-2022 school year the district will open four consolidated middle-high schools serving students grades seven through twelve at each location.
- As a result of their CLNA, the district uncovered multiple strengths, weaknesses and opportunities for improvement to their CTE programs.
 - The district uncovered opportunities to improve and expand upon their career and technical student organizations (CTSO); CTE advisory committees; and non-traditional student enrollment.

- Advanced manufacturing and the firefighter program were viewed as strengths. Both programs were introduced over the course of the past few years, but the results of the CLNA confirmed the need and desire for those program in the local community.
- Although the district reports very little turnover with CTE teachers, they do acknowledge that filling occasional vacancies can be difficult. New CTE teachers participate in ongoing professional development, and are paired with an experienced teacher that will serve as their mentor. This mentorship lasts for the first three years of a new hire’s tenure.
- All 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.
- PCSD offers CTE students multiple learning opportunities outside of the classroom.
 - Students are able to participate in dual enrollment with St. Johns River State College and earn post-secondary CTE credits.
 - VyStar Credit Union is housed on one of the high school campuses, and is run by students. This offers students invaluable experience and qualifies as work study.
 - The automotive program has partnerships with local car dealerships that give students work experience and job opportunities post-graduation.
- No reasonable services and accommodations are denied to those students who self-declare a disability. All teachers and administrators receive training on working with students who have special needs.
- The CLNA advisory committee will provide ongoing consultation to CTE administrators on how to continually increase the impact and outreach of their programs. Due to the small size of the district, it is expected that a majority of the stakeholders who participated in the most recent CLNA will continue to provide feedback in the coming years.

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.

- No grant funds were used to purchase equipment.
- The district does have a technology plan that includes policies on new equipment requests, equipment safety/storage and 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) 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

- Procurement records
- Memorandums of Understanding (MOUs) and articulation agreements
- Advisory committee records – agendas, sign in sheets, etc.
- 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.

- 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 CTE director has access, via Skyward®, to all financials records pertaining to her grants, and conducts regular reviews of the grants’ financial standings with the district financial secretary.
- District policies and procedures for procurement and financial management were provided as part of the VDMR.
- Monetary expenditures written into the Perkins grant are determined by the CLNA, advisory board recommendations, teacher recommendations and program needs.
- Monitoring staff conducted a budget analysis of the PCSD Perkins grants. Upon review, the following non-compliance finding was discovered:
The budget analysis for project 540-1619B-9CS01 included an object code (113) that was overcharged by \$43,427.84 of the originally approved expenditure amount in the initial grant application. This will result in a finding. Expenditures in excess of the previously approved grant application should be approved via amendment with the state. Although unapproved by the state, the expenditures in the above-referenced object code was 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 overcharged in comparison to the original approved 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.

- PCSD 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 Northeast Florida
 - St. Johns River State College
 - Numerous local automotive dealerships
 - Solaris Healthcare Palatka
 - Northeast Florida Educational Consortium
 - Putnam County Chamber of Commerce
 - Palatka City Fire Department
 - Georgia Pacific
 - General Electric
 - VyStar Credit Union

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – PCSD 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 Putnam County School District virtual desk monitoring review. Special thanks is offered to Ms. Renee Hough for her participation and leadership during this process.

APPENDIX A

Putnam County School District
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: PUTNAM COUNTY SCHOOL DISTRICT					
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	0	<u>X 6</u>	0
	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	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					146

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

APPENDIX B

Putnam County School District
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 overcharged in comparison to the original approved 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: The CTE director shall provide a memo of attestation stating the district acknowledges the finding. No other action is required</p>	<p>The agency will draft and provide the required memo of attestation.</p>	<p>June 30, 2021</p>
<p>Plan submitted by (name and title): Renee Hough Date: June 15, 2021</p> <p>Plan accepted by: Michael Swift Date: June 15, 2021</p>			
<p>Status of Action Plan (to be completed by FDOE staff): Complete</p>			
<p>Date: August 18, 2021</p>		<p>Status of Plan Completion: Complete</p>	