



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

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

**Valencia College**

**March 15-19, 2021**

**Final Report**

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Florida Department of Education  
Division of Career and Adult Education

**Valencia 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 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, 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 Valencia College (VC) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Dr. Sanford Shugart, president, Valencia College on December 1, 2020. The designated representative for the agency was Dr. Nasser Hedayat.

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

## V. VALENCIA COLLEGE

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Postsecondary – 20,051

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 Postsecondary	482-1619B-9CP01	\$2,995,612.00	\$ .00

#### **FY 2019-20**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Postsecondary	482-1610B-0CP01	\$3,328,622.00	\$ 7,124.30

#### **FY 2020-21\***

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Postsecondary	482-1611B-1CP01	\$2,588,155.00	\$ 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://valenciacollege.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 VC 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
Dr. Nasser Hedayat	Director CTE	X	X
Kristeen Gammon	Asst. VP, Resource Development	X	X
Isis Suarez Rivera	Account Specialist, Grants Accounting Office	X	X
Anjela Madison	Project Director, Perkins Grant	X	X
Christine Kretchik	Director, Accounting	X	X
Cynthia Santiago-Guzman	Director, Compliance & Audit, Internal Auditing	X	X
Edwin Sanchez Valez	Asst. VP, Admis, Records & Grad	X	X
Diane Fahr	Director, Accounting	X	X
Lashon Henderson	Director, Grant Compliance	X	X
Yaremis Fullana	Managing Director, Procurement	X	X
Dr. Brandon McKelvey	VP, Analytics and Planning		X
Dr. Iris Artze-Vega	VP, Academic Affairs	X	X
<b>FDOE Monitoring Team</b>			
Charles Davis	Program Specialist, QAC, FDOE	X	X
Michael Swift	Program Specialist, QAC, FDOE	X	X
Orion Price	Program Specialist, QAC, FDOE	X	

### Interviews

VC 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 VC are managed by Dr. Nasser Hedayat.
- VC worked with numerous stakeholders to assist in the creation of the district’s comprehensive local needs assessment (CLNA). Those stakeholders will also serve as an advisory committee for each program of study. A list of Advisory Council meetings was provided for evidence.
- VC offers “Focus on the Workplace,” a unique program designed to allow faculty to observe, work and learn in an exciting business environment in a field related to their discipline so they can learn more about workplace needs, trends and expectations.
- Perkins Mini-Grants are spent to secure training or professional development in high priority areas for CTE related training industry and certification for faculty and conduct activities such as action-research, pilot projects, or on-site program visits for the purpose of program improvement.

**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.

- VC is currently using the BANNER® management information system (MIS).
- Frequent trainings are provided on MIS requirements, data collection procedures, data entry and other pertinent areas.
- All of the data elements required of their local MIS were included in the system and verified during the desk review.
- Annually, VC informs students of the Family Educational Rights and Privacy Act (FERPA) of 1974. (20 U.S.C. 1232g and 34 C.F.R., 99.1-99.67).
- The Assistant Vice President of Admissions, Registration, Records, and Graduation is responsible for data collection, entry and verification of student data.
- All student level data was made available to the FDOE monitoring staff during the VDMR.
  - Student Transcripts
  - Industry Certificates
  - Upon reviewing student performance data, it was discovered one student was mistakenly reported as an industry certificate completer but was misidentified with another student. This will result in a finding. The provider’s responsibility is to be mindful of collecting and reporting data accurately, as outlined in the FDOE Data Handbook. The provider was informed of the data error and acknowledge inaccurate data submission to FDOE.

#### FINDING AND ACTION

- Finding B1: The provider failed to accurately report student data in FY 2018-19. This is in violation of UGG 2 CFR 200.328 “Monitoring and reporting program performance.”
  - Corrective Action B1: The CTE Coordinator shall draft and submit a memo of attestation. No further action is required.

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

- VC offers 129 career programs at seven campuses throughout the college. Programs include but aren’t limited to: Horticulture Science & Service, Digital Design, Allied Health Assisting, Engineering Technology, Hospitality and Tourism, Web Development, Applied Cyber Security, and Biomedical Sciences.
- The college’s curriculum is designed to enhance the learning process and increase worker productivity in high-skill, high-wage jobs to make workers more competitive, efficient and marketable.
- The General Admission Requirements were provided for evidence of college’s enrollment requirements.
- Valencia College has a dedicated talent acquisition team fully dedicated to the recruitment of staff and faculty positions, partnering with department hiring managers and search committee members.
- No reasonable services and accommodations are denied to those students who self-declare a disability. The Students with Disabilities Handbook was provided for evidence of the college disability policy.
- CTE students have the opportunity to participate in multiple Career and Technical Student Organizations (CTSO), as well as other clubs and groups throughout the college.
- Professional Development (PD), Training and Certification spreadsheet was provided for evidence of employee PD.

**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.

- VC utilizes the AssetWin® system as its integrated inventory management system.
- 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 college has a technology plan that includes policies on new equipment requests, equipment safety/storage, and old inventory disposal. The College Property Control, 5-11, was presented as evidence.
- There have been no reports of stolen or lost equipment over the previous 24 months.

**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.

- 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 college has financial policies and procedures in place to ensure the efficient cash management of CTE grant funds. The Valencia College Grants Administrative Procedures were provided for evidence.
- Ellucian Banner® is the college Enterprise Resource Planning (ERP) system. The system allows for shared knowledge of expenditures and real time financial activity.
- The college has detailed and thorough procedures for the procurement of equipment and inventory that is funded by its federal grants. The Project Director is responsible for

- approving grant expenditures. The Grants Accounting Office reviews expenses for allowability, reasonableness, and completeness. The General Operating Manual (Chapter 3 Finance section) was provided for evidence.
- VC has numerous checks and balances to ensure accurate accounting records. The preparer (Grants Accounting Specialist, Assistant Director, or Accounting Director) completes the cash worksheet. Budget and financial reports help to determine a grants current financial standing, and the likelihood of achieving a grant’s financial goals. Budget amendments are submitted to FDOE if the opportunity arises.
  - Monitoring staff conducted a budget analysis of VC’s FDOE grants. Upon review, the following non-compliance findings were discovered:
    - (G1): CTE 2018-19, 2019-20 budget narratives which resulted in the DOE399 (final expenditure report) to include the following:
      - FDOE did not previously approve expenditures in several object codes (6300 and 6450), and no record of any budgetary amendments were 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 college acknowledges the finding. No further 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.

- VC maintains Career Pathways articulation agreements with Seminole State College, Orange Technical College, Osceola Technical College, Orange, Osceola, Lake, Seminole, and Marion County District Schools.
- Career Coach is a free online tool that allows students and community members to explore potential careers. Career Coach also includes a built-in resume builder to help students and jobseekers quickly and efficiently put together an updated resume with key skills and job experience highlighted.
- VC has numerous collaborations and MOUs within the local community. They often offer additional educational and job experiences to students within the college. The list of partners include, but are not limited to:
  - Career Source Central Florida
  - City Walk-Universal
  - Wyndam Resorts
  - Disney/MGM Studios
  - Orange County Commission



## **VIII. REQUIRED RESOLUTION ACTIVITIES**

### **CAREER AND TECHNICAL EDUCATION**

1. Corrective Action Plan – VC 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 Valencia College virtual desk monitoring review. Special thanks is offered to Dr. Nasser Hedayat for his participation and leadership during this process.

**APPENDIX A**

Valencia College  
Career and Technical Education  
Risk Matrix

<b>Risk Scores Matrix for Colleges Receiving Career and Technical Education (CTE) Carl D. Perkins Grants</b>					
Agency Name: <b>VALENCIA COLLEGE</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	7	<u>X 10</u>	70
	5-6	5			
	3-4	3			
	0-2	1			
<b>Total Budget for all Perkins Grants Combined</b>	Upper Quartile	7	7	<u>X 8</u>	56
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Perkins Grants</b>	4 or More	7	1	<u>X 8</u>	8
	3	5			
	2	3			
	1	1			
<b>Change in Management Information Systems (MIS) from Previous Fiscal Year</b>	Yes	7	0	<u>X 6</u>	0
	No	0			
<b>Agency CTE Program Director Change from Previous Fiscal Year</b>	Yes	7	0	<u>X 6</u>	0
	No	0			
<b>Unexpended Funds from all Perkins Grants Combined</b>	Upper Quartile	7	0	<u>X 4</u>	0
	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	7	<u>X 4</u>	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>AGENCY RISK SCORE:</b>					<b>162</b>

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

**APPENDIX B**

Valencia College  
Corrective Action Plan

Finding	Corrective Action	Agency Response	Projected Date of Completion
Finding B1: The provider failed to accurately report student data in FY 2018-19. This is in violation of UGG 2 CFR 200.328 “Monitoring and reporting program performance.”	Corrective Action B1: The CTE director shall provide a memo of attestation stating the district accepts the finding. No other action is required.	Letter of attestation provided; no further action required.	April 14, 2021
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 accepts the finding. No other action is required.	Letter of attestation provided; no further action required.	April 14, 2021
<p><b>Plan submitted by (name and title):</b> Dr. Nasser Hedayat, Assistant Vice President for Career and Workforce Education  <b>Date:</b> April 14, 2021</p> <p><b>Plan accepted by:</b> Chuck Davis  <b>Date:</b> 4/14/2021</p>			
<b>Status of Action Plan (to be completed by FDOE staff):</b>			
<b>Date:</b> 4/14/2021		<b>Status of Plan Completion:</b> Complete	