

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

Florida Department of Corrections

February 14 - 18, 2022

Final Report

TABLE OF CONTENTS

1 1
1
1
2
2
3
7
7
8
10

Florida Department of Education Division of Career and Adult Education Florida Department of Corrections Career and Technical Education and Adult 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 designing, developing, implementing, and evaluating a comprehensive quality assurance system, 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).

III. QAC CORE MONITORING GUIDE

The Core Monitoring Guide (CMG) is intended to be used broadly by any reviewer conducting an onsite or desk monitoring of any program currently administered by the division. The guide provides a summary of each facet of the monitoring design and the process. It also contains objectives that may be used as agencies are monitored or reviewed. It is located on the division's website at http://fldoe.org/academics/career-adult-edu/compliance.

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 Florida Department of Corrections (FDC) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Ms. Gwen Brock, bureau chief, on November 1, 2021. The designated representative(s) for the agency were Mr. Robert Melgaard and Dr. Robert Britt-Mills. The division's representative conducting the VDMR was program specialist Michael Swift of the Quality Assurance and Compliance section.

V. FLORIDA DEPARTMENT OF CORRECTIONS

ENROLLMENT: CTE – 1,062 AE - 6,256

Finance

The provider was awarded the following grants for fiscal year's (FY) 2018-19, 2019-2020 and 2020-21:

FY 2018-19 Grants Perkins Leadership	<u>Grant Number</u> 708-1629B-9CL01	<u>Grant Amount</u> \$ 687,069.00	<u>Unexpended</u> \$ 48,273.18
Adult Education - Corrections	708-1919B-9CC01	\$ 1,000,000.00	\$ 0.00
FY 2019-20 <u>Grants</u> Perkins Leadership Adult Education - Corrections	<u>Grant Number</u> 708-1620B-0CL01 708-1910B-0CC01	Grant Amount \$ 962,069.00 \$ 1,000,000.00	<u>Unexpended</u> \$ 10,931.76 \$ 17,982.28
FY 2020-21 Grants Perkins Leadership Adult Education - Corrections	<u>Grant Number</u> 708-1621B-1CL01 708-1911B-1CC01	Grant Amount \$ 1,000,000.00 \$ 1,000,000.00	<u>Unexpended</u> \$ 287,239.49 \$ 51,165.80

Additional information about the provider may be found at the following web address: <u>http://www.dc.state.fl.us/development/programs.html</u>

VI. MONITORING ACTIVITIES

The monitoring activities included pre and post-review planning, an entrance and exit meeting, records review, and interviews with administrators, if necessary. Inventory reviews are also conducted when onsite with a provider.

<u>Onsite Visits</u> No on-site visits were conducted as part of the VDMR.

Entrance and Exit Conferences

The entrance conference for FDC was conducted on February 14, 2022. The exit conference was conducted on February 18, 2022. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Robert Melgaard	CTE Programs Administrator	X	Х
Robert Britt-Mills	Academic Programs Administrator	X	Х
Melvin Herring	Assistant Bureau Chief-Academics		Х
April Kalnin	Assistant Bureau Chief-Workforce Development		Х
Gwen Brock	Education Bureau Chief		Х
Conner Birdsong	Correctional Services Consultant		Х
Allen Richardson	Curriculum Coordinator	X	Х
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	X	Х
Charles Davis	Program Specialist, QAC, FDOE		Х

Interviews

Monitoring staff conducted CTE and AE interviews with FDC as part of the VDMR process.

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, section F. A minimum of 15 student records were checked. In addition, policies and procedures were examined and discussed at various times during the monitoring review.

VII. OBSERVATION

- A. <u>ADMINISTRATION</u> refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.
 - The Bureau of Education within FDC is responsible for overseeing the academic and vocational needs of its inmates. Their AE and CTE programs, along with grant management, fall under this bureau.
 - The FDC CTE and AE grants are managed by the CTE Programs Administrator and the AE Academic Programs Administrator. Both AE and CTE grants follow a similar process for the drafting, approval and submission of their grants to FDOE.
 - Upon completion of the grant application, the AE grant manager then proceeds to seek final approval of the grant from the assistant bureau chief of education; the bureau chief; the director of programs; and final approval is made by the bureau secretary.
 - Similarly, the CTE grant is approved by the CTE workforce chief and program director before following the same approval process as the AE grant application.
 - Once all of the programmatic needs are addressed and the grant applications are approved, the grant managers will then submit the grant applications to their FDOE grant manager.
 - FDC is different from traditional providers receiving CTE grant funds in that their service area includes the entire state of Florida as opposed to the much smaller regions serviced by school districts or colleges. In addition to a state-wide service region, upon release an inmate may or may not remain with the region in which they were incarcerated.
 - As part of the required comprehensive local needs assessment (CLNA), CTE administrative staff consulted with numerous individuals, advisory committees and entities across the entire state. FDC conducts annual program reviews and utilizes the state in-demand occupations list

as opposed to the local lists used by districts and colleges. To help facilitate this, FDC hired an outside consulting firm to assist with their CLNA. Advisory committees from various regions across the state worked alongside the consulting firm to determine what programs would match each specific regions workforce needs. FDC also consulted directly with statewide business associations, state and local agencies, teachers, students and representatives of special populations. This state-wide collaborative effort ensures that once an inmate is released he or she will be ready for workforce opportunities despite where they move to within the state. FDC plans to utilize the same consulting firm for future CLNAs, and the regional advisory committees will provide ongoing support and engagement within their CTE programs.

- FDC conducts ongoing professional development and training to ensure all CTE and AE administrative staff are up to date on any changes that come from the federal and/or state level Department of Education.
- **B.** <u>**DATA AND ASSESSMENT**</u> refer to all the data and assessment system components, including test administration, test security, data collection, entry, reporting, and procedures. The use of data in program decision-making is also explored and commented on.
 - FDC utilizes the Offender Based Information System (OBIS) as their management information system (MIS) to house and track student data such as records, grades and attendance. OBIS is unique in that it is a dedicated MIS used exclusively by the U.S. Department of Justice.
 - FDC has operational review standards for data collection, entry and verification. Job descriptions were also provided for those individuals who participate in these tasks within OBIS.
 - FDC provided guidelines on instructional hours, pre and post-testing of students, and how to interpret scores and assign educational functioning levels (EFL). It is a student's assigned functioning level that determines placement with an Adult Basic Education (ABE) program.
 - All proctors of the Tests for Adult Basic Education (TABE) are trained and certified, as required, by the state and the appropriate testing company. Certifications were verified as part of the VDMR.
 - Student electronic files include "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA).
 - Samples of AE student data were reviewed and verified for accuracy as part of the VDMR. No errors were found. All student records were provided by FDC.
- C. <u>CURRICULUM AND INSTRUCTION</u> refer to those elements that contribute to student learning and skill acquisition.
 - FDC offers CTE and AE programs at multiple correctional institutions (CI) throughout Florida.
 - CTE offers 92 courses across 37 vocational trades with 11 career clusters. Not all programs are available at each CI offering CTE classes.
 - AE offers adult basic education courses and GED preparation classes.
 - Due to students being incarcerated, FDC does not offer dual enrollment or work-based learning opportunities away from the CI.
 - Upon intake, all incarcerated individuals who wish to participate in CTE and/or AE programs are vetted for fit at their CI.
 - Prospective CTE students fill out career interest forms called Career Cruiser. This form will help uncover programs of interest for prospective students, but is limited to what is available at their particular CI. The education supervisor will then meet with the prospective student to review their inmate history and discuss the options available to them.

- Prospective AE students are TABE tested to determine their EFL and will be placed in academic classes according to their competencies or lack thereof. Each CI has different size classrooms and space so the number of students per class does vary across the state. Because of this, some students may be placed on a waiting list until space opens up.
- Preference is given to those inmates who are serving a sentence of three years or less, but all inmates who meet the eligibility requirements are considered on a case by case basis.
- During the height of the COVID-19 pandemic program enrollment was halted during times of lockdown at the CIs. CTE students were unable to earn program hours due to the hands-on nature of the programs. Measures such as the incorporation of Zoom Boards and the disbursement of academic work packets helped to ensure students could still learn during lockdowns.
- FDC puts forth great effort to attract and retain quality CTE and AE teachers, but admits the task can be difficult. Two of the biggest barriers include the work environment and salary. Teacher salaries can sometimes be as much as \$10,000 less than what is offered from local school districts. Because of this many instructors are either close to retirement age or actually retired. One benefit that does help to retain teachers is that they are hired as employees of the State of Florida and therefore qualify for state benefit packages.
- AE and CTE instructors participate in ongoing trainings provided by FDOE, as well as annual professional development through FDC. The FDC Bureau of Education is also responsible for coordinating teacher certifications for the department's correctional educators.
- No reasonable services and accommodations are denied to those students who self-declared a disability. The FDC Bureau of Education's Individualized Educations Plan (IEP) team is responsible for the development of individual IEPs for students; the analysis of assessment and evaluation results; and helps to determine each student's individual needs and/or accommodations.
- **D.** <u>**TECHNOLOGY AND EQUIPMENT**</u> refer 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 federal, state and local guidelines are included within the inventory management system.
 - FDC has policies and procedures on property management, equipment safety/storage and inventory disposal. Due to the unique circumstances of each CI where services are provided, all equipment purchases must first be vetted by security staff at each location prior to beginning the procurement process.
 - FDC utilizes a "termination of property accountability" form in the event that an inventory item is unaccounted for due to loss or theft. Due to the secure nature of program sites, loss of property has always been minimal and there have been no instances of lost or stolen grant-funded inventory over the past three fiscal years.
 - FDC adheres to the state policy of "all personal property with a value of \$1,000" or more shall be included in the DOE 101 Budget Narrative. Their local financial system considers items over \$5,000 as capitalized.
 - Due to the nature of the VDMR, no onsite inventory of equipment was conducted. FDC was asked to provide images and procurement records for a select number of inventory items, and no instances of non-compliance were found.
- **E.** <u>ACCESS AND EQUITY</u> refer to compliance with federal non-discrimination laws' requirements 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. <u>**RECORDS REVIEW</u>** refers to reviewing the records and documents that evidence compliance with federal and state rules and regulations. In addition, a sampling of financial and programmatic records is reviewed.</u>
 - MIS data quality checklists and pictures from OBIS
 - Agency policies and procedures for data collection, verification and reporting
 - Agency policies and procedures for finance and procurement
 - Agency policies and procedures for property management
 - Agency policies and procedures on TABE testing and student placement
 - Grant funded purchasing card records
 - Student interest handbooks
 - Inventory records and pictures of select inventory items
 - Travel records and supporting documentation
 - Procurement records
 - CLNA and program advisory committee records agendas, sign-in sheets, etc.
 - Professional development and training records agendas, sign-in sheets, training materials, etc.
 - AE student data review
 - TABE proctor certification records
- **G.** <u>**FINANCIAL**</u> 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 Florida Accounting Information Resource (FLAIR) system is used as the enterprise resource planning (ERP) and general ledger accounting system.
 - FDC's fiscal policies and procedures manual ensures the efficient management of CTE and AE grant funds. The following procedural manuals were reviewed:
 - Procurement thresholds
 - Methods of procurement
 - Contract management
 - Cash management

Additional procedures were presented to the monitoring staff in regards to "conflict of interest" with competitive and non-competitive solicitations of products or services.

- The AE and CTE grant managers work with the agency's grants financial specialist to ensure all expenditures are allowable by law and able to be funded with federal dollars. Meetings are also conducted monthly with the financial specialist to keep track of grant expenditures and the financial standing of their federal grant dollars. The grant managers have limited access to financial reports, but there are open lines of communication with the financial specialists to ensure that all parties involved are always in agreement with a grant's current fiscal standing.
- Purchase orders are only created and authorized for items previously approved in the FDOE federal grant application. Once a purchase has been authorized, the method of procurement is determined based on the price of the item(s). Agency policies and procedures mandate that procurement thresholds fall into one of five categories:
 - Category one \$20,000 or less shall use good procurement practices.
 - Category two \$20,001 to \$34,999 shall require at least two written quotes or informal solicitations.
 - Category three \$35,000 to \$64,999 shall require a formal competitive solicitation. Additional review of the purchase order shall take place via the agency purchasing analyst.

- Category four \$65,000 to \$194,999 shall require legal review along with a formal competitive solicitation. Additional review of the purchase order shall take place via the agency purchasing manager.
- Category five \$195,000 \$324,999 shall require legal review along with a formal competitive solicitation. Additional review of the purchase order shall take place via the agency bureau or procurement, assistant chief.
- Anything above \$325,000 requires special approval along with legal review and a formal competitive solicitation. Additional review of the purchase order shall take place via the agency bureau of procurement, assistant chief and/or chief.
- Policies and procedures are also in place for the procurement of goods considered a "sole source purchase."
- All capitalized equipment purchases are "tagged" with a FDC asset identification number.
- Select program administrators do have authorized access to grant-funded purchasing cards (P-card). Policies and procedures for P-card users were submitted to the monitoring staff as part of the review.
- **H.** <u>COLLABORATION</u> refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.
 - FDC has numerous collaborations, partnerships and MOUs throughout the state. They often offer additional workforce recommendations and provide crucial employment preparation skills and job placement programs for inmates upon release. The list of partners includes, but is not limited to:
 - CareerSource Florida
 - Florida Department of Economic Opportunity
 - Florida Masonry Apprenticeship and Education Foundation
 - Florida Restaurant and Lodging Association
 - Florida Association of Cosmetology and Technical Schools
 - Northeast Builders Association
 - Concrete Council

VIII. RESULTS

FDC was not found to be out of compliance. All items reviewed were compliant in accordance with applicable local, state and federal laws and/or policies and procedures.

IX. SUMMARY

Once the monitoring review 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 corrective action plan items have been completed, when applicable, and that no further action is required. This letter will officially end your monitoring process.

The monitoring team extends its appreciation to all participants of the Florida Department of Corrections monitoring review on behalf of the department. Special thanks are offered to Mr. Robert Melgaard and Dr. Robert Britt-Mills for their participation and leadership during this process.

APPENDIX A

Florida Department of Corrections Career and Technical Education Risk Matrix

Risk Scores Matrix for a Non-College or Non-School District Receiving Career and Technical Education (CTE) Carl D. Perkins Grants

Agency Name: Florida Department of Corrections Program type: CTE Monitoring Year: 2021-2022

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7			
	5-6	5		V 10	20
	3-4	3	3 <u>X 10</u>	<u>X 10</u>	30
	0-2	1			
	Upper Quartile	7			
Total Budget for all Perkins	Upper Middle	5	_	TL O	
Grants Combined	Lower Middle	3	7	<u>X 8</u>	56
	Lower Quartile	1			
	4 or More	7			
Number of Perkins Grants	3	5	1	VO	Q
	2	3	1	<u>X 8</u>	8
	1	1			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	0	V 6	0
	No	0	0	<u>X 6</u>	0
	Upper Quartile	7			
Unexpended Funds from all Perkins Grants Combined	Upper Middle	5			
	Lower Middle	3	5	<u>X 4</u>	20
	Lower Quartile	1			
	0	0			
			AGENCY RIS	K SCORE:	114

Data sources used for calculations: Prior to July 1, 2020

Florida Department of Corrections Adult Education Risk Matrix

Risk Scores Matrix for a Non-College or Non-School District Receiving Adult Education (AE) Grants

Agency Name: Florida Department of Corrections Program Type: AE Monitoring Year: 2021-2022

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metri Points
Number of Years Since Last Monitored	7 or More Years	7	3		
	5-6	5		3710	20
	3-4	3		<u>X10</u>	30
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	7	<u>X 8</u>	56
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	4 or More	7			8
Number of Adult Education	3	5		<u>X 8</u>	
Grants	2	3	1		
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	- 7	V (42
	No	0		<u>X 6</u>	
Agency AE Program Director Change from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
	Upper Quartile	7			20
Unexpended Funds from all	Upper Middle	5	5 <u>X4</u>		
Adult Education Grants	Lower Middle	3		<u>X 4</u>	
Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7			<u>4</u> 20
Number of Findings from the	Upper Middle	5			
Office of the Auditor General	Lower Middle	3	5 <u>X4</u>	<u>X 4</u>	
Office of the Auditor General	Lower Quartile	1			
	0	0			
	Target Not Met				
	on 3 of 3	5			12
	Indicators				
	Target Not Met		2 <u>X 6</u>		
Adult Education Program	on 2 of 3	3		X 6	
Improvement Plan (AEPIP)	Indicators			14	
	Target Not Met on 1 of 3	1			
	Indicators	<i>.</i>			
	All targets met	0			
			Agency I	Risk Score	188

Data sources used for calculations: Prior to July 1, 2020

ATTACHMENT A

Florida Department of Corrections - Academic Education

In the last three fiscal years, the Florida Department of Corrections' Education Department has expanded our focus on low-level literacy by implementing positions at targeted sites to provide tutor English Language Learners, English as a Second Language, and those with low reading comprehension. This instruction utilizes a curriculum designed for literacy instruction and remediation. The target outcomes are improvement of reading and language skills to a level allowing the student to be successful in the mainstream classroom and, eventually, pass the General Education Development (GED®) exam or complete a Workforce Education certificate program.

We have developed a comprehensive training program for Inmate



Education Workers that provides standardized, leveled instruction for those individuals job assigned to work in Education. The program builds upon each level with trainees beginning as Aides and progressing to Tutors and then Teaching Assistants. The Teaching Assistants may remain in instructional positions in Education (overseen by certified teachers) or may choose to progress further in the program. Additional opportunities include positions in Workforce Education, Substance Use Treatment, Wellness, Medical, Mental Health and Chaplaincy. This program provides job skills essential for re-entry success.



We are increasing the number of sites with Integrated Education Programs, blending academic and workforce instruction to assist individuals in achieving both a GED® and a workforce credential upon completion of the program.

We are improving technology available for use in classrooms including 65" touch screen television monitors, Zoom-connected monitors, secure and monitored online access, and computer labs. Students complete standardized testing on Chromebooks and participate in GED® exams and GED® preparation programs on newly updated computers.

In fiscal year 2020-2021, 14,877 inmates participated in education programs. During this time, 1,057 GEDs were earned. Additionally, 2,732 and 2,154 students improved their reading and math TABE scores respectively.

Florida Department of Corrections - Career and Technical Education

The Florida Department of Corrections career and technical education training provides inmates with necessary skills to better prepare themselves to obtain and retain employment in a competitive sector upon release. These types of trainings also combat inmate idleness within prison, while helping to create a sense of worth and responsibility to be replicated in the community. Inmates who have completed career and technical education programs recidivated at a rate that is 25.1 percent less than those who did not participate and complete a CTE program.





In fiscal year 2020-2021, FDC expanded career and technical training opportunities by 44 percent. FDC has 2,024 daily training seats, with 5,308 inmates participating in career and technical classes, awarding 3,231 industry credentials and 817 vocational certificates during this year. FDC offers training in 41 crafts over 11 career clusters. FDC has experienced a 100 percent increase of available training seats over four years.

The Department has formed partnerships with leading educational organizations to provide inmates with skills training, which include the University of Florida, Miami Dade College, Palm Beach State College, Tallahassee Community College and others. Further, FDC has created partnerships with industry-leading organizations, which include the Occupational Safety and Health Administration (OSHA), ServSafe, the Florida Department of Environmental Protection, and the Cleaning Management Institute, along with many others. These partnerships help to bridge the gap to employment upon release.



FDC CTE programs utilize industry-leading technology, tools, and equipment which help skills training to remain current with the private sector. FDC uses highly skilled and experienced CTE instructors to provide training to inmates. These valuable instructors train inmates to become competitive, desired employees within their respective fields. The Department is continuously seeking opportunities to expand and strengthen its CTE programming to provide industry-recognized credentials to inmates.



The Department offers inmates the opportunity to compete using their newly learned skills across the state. For example, the Department holds a yearly masonry competition for inmates to showcase their work to prospective employers. Additionally, the Department offers inmates the opportunity to participate in graduation ceremonies to reward their achievements. Please address inquiries regarding this report to:

Kara Kearce Director of Quality Assurance and Compliance <u>Kara.Kearce@fldoe.org</u> (850) 245-9033

Florida Department of Education Division of Career, Technical and Adult Education 325 West Gaines Street · Room 722A Tallahassee, FL 32399