



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

**Quality Assurance and Compliance
Onsite Monitoring Review
for
Perkins Career and Technical Education
and
Adult Education**

Hernando County School District

December 4-5, 2023

Final Report

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Florida Department of Education
Division of Career and Adult Education
Hernando County School District
Adult Education and Career and Technical Education
Quality Assurance and Compliance Monitoring Report

I. INTRODUCTION

The Division of Career and Adult Education (Division) within the Florida Department of Education (Department) has several key responsibilities, including leadership, resource allocation, technical assistance, monitoring and evaluation. These duties require the Division to oversee the performance and regulatory compliance of federal and state funding recipients. The Quality Assurance and Compliance (QAC) office plays a critical role in this process by designing, developing, implementing and evaluating a comprehensive quality assurance system, which includes monitoring. This system aims to ensure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is the Division's duty to regularly monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

II. AUTHORITY

The Department receives federal funding from the Used for Career and Technical Education (CTE) under the Carl D. Perkins Strengthening Career and Technical Education for the 21st Century Act, and for Adult Education (AE) under the Workforce Innovation and Opportunity Act of 2014. The Department awards sub-grants to eligible providers to administer local programs. The Department 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 and the Uniform Grant Guidance for grant awards issued on or after December 26, 2014. The Division 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 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 office 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 Hernando County School District (HCSD) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Mr. John Stratton, Superintendent, on September 11, 2023. The designated representative for the agency was Ms. Beth Lastra (CTE) and Ms. Sophia Watson (AE). The Division's representative conducting the OSMR was Program Specialist Charles Davis of the QAC office.

V. Hernando County School District

The provider was awarded the following grant(s) for the fiscal years 2020-21, 2021-22 and 2022-23:

Finance

FY 2020-21

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	270-1611B-1CS01	\$ 280,037.00	\$ 34,150.21
Adult Education-AGE	270-1911B-1CG01	\$ 232,500.00	\$ 31,319.14
Adult Education-IELCE	270-1931B-1CE01	\$ 29,623.00	\$ 8,934.32

FY 2021-22

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	270-1612B-2CS01	\$ 292,101.00	\$ 44,323.20
Adult Education-AGE	270-1912B-2CG01	\$ 330,660.00	\$ 73,235.51

FY 2022-23

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	270-1613B-3CS01	\$ 313,788.00	\$ 89,096.35
Adult Education-AGE	270-1913C-3CG01	\$ 398,660.00	\$ 113,294.77

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

<https://www.hernandoschools.org/>

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.

Onsite Visits

The monitoring team visited the following sites as part of the OSMR:

- Central High School

- D.S. Parrott Middle School
- Hernando High School
- Wilton Simpson Technical College (WSTC)

Entrance and Exit Conferences

The entrance conference for HCSD was conducted on December 4, 2023. The exit conference was conducted on December 5, 2023. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Beth Lastra	Director CTE Secondary, HCSD	x	x
Sophia Watson	Director AE, HCSD	x	x
Nicole Blair	College & Career Specialist, HCSD	x	x
Danyl Williams	College & Career Specialist, HCSD	x	x
Kara Trowell	College & Career Programs Manager, HCSD	x	x
Radiah Dent	Coordinator CTE, HCSD	x	
Division Monitoring Team			
Michael Swift	Program Specialist	x	x
Charles Davis	Program Specialist	x	x

Interviews

No interviews were required as part of the OSMR. HCSD submitted thorough and qualitative documentation and records via the Department ShareFile.

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, section F. A minimum of 50 student records were checked. In addition, policies and procedures were examined and discussed at various times during the monitoring review.

VII. OBSERVATION

A. ADMINISTRATION refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.

- As part of the required comprehensive local needs assessment (CLNA), Secondary CTE administrative staff consulted with numerous individuals and entities across the Hernando County service area. Representatives from special population groups also provided insight into the workforce needs and opportunities for those students. The list of stakeholders includes, but is not limited to:
 - CareerSource Pasco/Hernando
 - Greater Hernando Chamber of Commerce
 - District staff, faculty, students and administrators
 - BayCare
 - Hernando County Office of Economic Development

- HCSD believes that professional learning opportunities are important to the continuous development of staff members as well as providing a connection to the ever-changing and evolving workforce. Through bi-annual district-wide in-service meetings, as well as trainings throughout the year, their teachers and staff meet to discuss and improve framework alignments, industry certifications and best practices for professional learning. Additionally, teachers and CTE staff attend state CTE learning opportunities through Florida Association of Career and Technical Education related trainings/meetings.
- The School Board adopted the records retention schedules published by the Florida Department of State, Division of Library and Information Services, Bureau of archives and Records Management, as set forth in publications including but not limited to GS1-SL and GS7 as amended from time to time and the district adheres to the state retention policy of 5 years.

B. DATA AND ASSESSMENT 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.

- HCSD currently utilizes Skyward® as their management information system and student information system to house and track AE and CTE student data such as records, grades and attendance.
- Policies and procedures on data collection, entry and verification were provided by the district as part of the monitoring process. Policies and procedures were also provided in regard to full-time equivalent survey reports submitted to the Department. The student survey reports are used to ensure the accuracy of data reports submitted to the Department, and the reconciliation of error reports they may receive from the state.
- HCSD conducts extensive and ongoing training for all individuals who have access to student data. Those individuals also participate in district sponsored training events such as quarterly webinars for AE and CTE, Workforce Education and District Data Advisory Council meetings, Florida Association of Management Information Systems and Workforce Development Information System conferences. Local, district-wide training also takes place as needed.
- All proctors of the Tests for Adult Basic Education and the Comprehensive Adult Student Assessment System are trained and certified, as required, by the state and the appropriate testing companies. Testing certificates were provided as evidence.
- HCSD students are assigned Family Educational Rights and Privacy Act rights at application and any subsequent change must be in writing and maintained in the students electronic or paper folder.
- Records reviewed included:
 - AGE completers and non-completers
 - Secondary CTE industry certifications
 - Postsecondary CTE industry certifications
 - Postsecondary program completers
- Upon review of the student data, it was determined that HCSD was non-compliant in the submission of AGE student data – See finding 1.

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

- The district CTE team annually reviews each program of study and makes the necessary adjustments to connect secondary, postsecondary and industry certifications. The process consists of reviewing state articulations, district articulations, the master credentialing list and program frameworks.
- CareerSource industry sector managers participate on CTE program advisory boards and work directly with the career education department to participate in decisions related to program offerings, course activities and vendor selection on related items.
- Special populations are encouraged to enroll in career education programs and receive appropriate accommodations and/or modifications to place them in the least restrictive environment. The district puts great effort into recruiting non-traditional students into its CTE programs. Non-traditional students are featured in recruitment materials and encouraged to follow through from programs to specific career opportunities. CTE teachers work with Special Student Education teachers and school administration to ensure equal access and work with individual education plan teams to ensure compliance with the Individuals with Disabilities Education Act.
- The LEA ensures compliance with federal anti-discrimination laws and General Education Provisions Act.
- Students also participate in Career and Technical Student Organizations which allow students to practice skills learned in the classroom via local, state and national competitions and gain invaluable leadership experience from opportunities to serve as chapter and regional officers.
- The monitoring team ensured appropriate programmatic links between the Secondary programs of study submitted to the Department and the corresponding Postsecondary program at OTC. Various other district articulation agreements were reviewed and verified for the appropriate Secondary to Postsecondary linkage.
- In accordance with WIOA, HCSD has a Memorandum of Understanding with CareerSource Pasco/Hernando to provide workforce training, employment assistance and other services for those interested in workforce programs and/or literacy services.
- In addition to employees having an equity policy, HCSD CTE department follows an equity policy for students..

D. **TECHNOLOGY AND EQUIPMENT** 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 capital assets are recorded in the Skyward® Fixed Asset System.
- The district's threshold for capitalization is \$5,000.
- School Principal and departmental managers or their designee are the responsible Property Managers (Custodians) of property charged to and under their area of accountability.
- Computerized fixed asset records are maintained by the Property Control Department for each school campus, administrative area, departmental and special center where qualifying equipment is utilized and housed. Physical inventory is taken annually by the district finance department or contracted vendor. The condition of assets is noted at that time.
- As part of the OSMR the QAC team conducted inventory search at Central High School, D.S. Parrott Middle School, Hernando High School and WSTC.

E. **EQUAL ACCESS** refers to compliance with federal non-discrimination laws' requirements

relating to recruitment, enrollment, participation and completion of programs.

- HCSD included the necessary policies required by the General Education Provisions Act, which ensures equal access and participation in programs regardless of sex, race, national origin, color, disability or age.

F. RECORDS REVIEW 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.

Items reviewed during the OSMR included, but were not limited to:

- District policies and procedures for data collection, verification and reporting
- District policies and procedures for finance and procurement
- District policies and procedures for property management
- CLNA with supporting documents
- CLNA advisory committee records and stake holder records
- Inventory records
- Procurement records
- ESE manual
- MOUs and articulation agreements
- Advisory committee records – agendas, sign-in sheets, etc.
- District professional learning records – agendas, sign-in sheets, training materials, etc.
- CTE and AE 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 and financial management system. It is also used to house contractual bids and track payments for vendors.
- The district’s finance department ensures the efficient management of CTE and AE grant funds. The following components of their financial policies and procedures manual were reviewed:
 - Budget Implementation
 - Cash Management
 - Methods of accounting
 - Fiscal internal controls
 - Records and reporting
 - Inventory management
 - Procurement
 - Conflict of interests
 - Temporary duty assignment (travel) – HCSD uses state-approved guidelines for travel-related expenditures such as mileage rates, per diem and food allowances.
- The district does not use purchasing cards specifically for grant funds.
- HCSD provided additional fiscal records such as time and effort reports, procurement records and travel records. All documents were in accordance with applicable local, state and federal law.
- Monitoring staff conducted a budget analysis of HCSD’s Department’s grants. See Finding 2.

H. **COLLABORATION** refers to the collaborative agreements, partnerships or MOU that are in place to benefit an agency's programs and students.

- HCSD has numerous collaborations, partnerships and MOUs within the local community. They offer additional educational and job experiences to students within the district. The list of partners includes, but is not limited to:
 - WSTC (Articulation)
 - Pasco-Hernando State College (Dual Enrollment)

VIII. RESULTS

HCSD was found to be out of compliance due to the following:

Finding Number	1
Area	Data and Assessment
Finding Summary	The monitoring staff uncovered multiple instances of student data reported to the Department not matching the student data provided by HCSD.
Finding Detail	After conducting a review of AE Completers submitted to the Division, it was determined that multiple students' literacy completion points were reported incorrectly.
Citation	Violation of UGG 2 CFR 200.313; UGG 2 CFR 200.313(c); UGG 2 CFR 200.303(d)(3)
Recommended/Anticipated Corrective Action	HCSD is currently under a corrective action plan. The Director of Research and Evaluation, Brittany Ross, will implement and monitor this additional finding.
Anticipated completion date:	The corrective action plan will be complete when the provider demonstrates an understanding and compliance with state reporting requirements.
Name and Title responsible for CAP	Sophia Watson, Director AE, HCSD
Plan Accepted by:	
Status of Action Plan	Open

Finding Number	2
Area	Finance
Finding Summary	A grant budget analysis (GBA) was conducted for HCSD for all grants from 2020-2023. There was an error in: Unapproved object codes, that were not consistent with the Red Book, were used on their 399 and 499.
Finding Detail	FY 2020-23 CTE-Secondary, AE:

	Object codes 193 and 194 were used on their 399 and 499 in multiple years and were not approved.
Citation	Violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments. Along with 2 CFR 200.308, (b) (c) Revisions of the budget & program plan, and 2 CFR 200.407 , not seeking prior approval before expending funds.
Recommended/Anticipated Corrective Action	The AE and CTE directors will provide a letter of attestation and plan of corrective action.
Anticipated completion date:	3/4/2024
Name and Title responsible for CAP	Beth Lastra, Director CTE Secondary, HCSD Sophia Watson-Director AE, HCSD
Plan Accepted by:	Chuck Davis
Status of Action Plan	Complete 3/4/24

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 Department monitoring team lead. Once the final report is approved, it will be forwarded to the agency head with a copy sent to the provider’s 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 Hernando County School District monitoring review on behalf of the Department. Special thanks are offered to Ms. Beth Lastra and Ms. Sophia Watson for their participation and leadership during this process.

APPENDIX A
Hernando 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: **Hernando County School District**
Program Type: **CTE**
Monitoring Year: **2023-2024**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	5	<u>X 10</u>	50
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	5	<u>X8</u>	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	3	<u>X 8</u>	24
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	7	<u>X 6</u>	42
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	5	<u>X 4</u>	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	5	<u>X 4</u>	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					196

Data sources used for calculations: Prior to July 1, 2022

Hernando County School District
Adult Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants

Agency Name: Hernando County School District
Program Type: AE
Monitoring Year: 2023-2024

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	5	<u>X10</u>	50
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	5	<u>X 8</u>	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education 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 AE Program Director Change from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	5	<u>X 4</u>	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	5	<u>X 4</u>	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Adult Education Program Improvement Plan (AEPiP)	Target Not Met on 3 of 3 Indicators	5	3	<u>X 6</u>	18
	Target Not Met on 2 of 3 Indicators	3			
	Target Not Met on 1 of 3 Indicators	1			
	All targets met	0			
Agency Risk Score					156

Data sources used for calculations: Prior to July 1, 2022

Attachment A

Hernando County School District Adult Education and Career and Technical Education

Since our previous monitoring visit in 2019, notable advancements have transpired within both departments.

In Adult Education:

- A dedicated appropriation has been secured for the establishment of our inaugural standalone technical college.
- This expansion initiative entails the introduction of new programs, encompassing Diesel Service Technician, Manufacturing, and a forthcoming Medical Program.
- We persist in fostering and expanding our collaborative partnerships with the neighboring state college, solidifying our commitment to mutual advancement and shared educational objectives.
- Our portfolio of Integrated Education and Training (IET) offerings has expanded, with plans to transition towards a more extensive array of pre-apprenticeship programs in the next academic year.
- Remarkably, our enrollment figures have demonstrated a steady increase despite the challenges posed by the pandemic. Specifically, our enrollment for the Fall term of 2023 has exhibited a commendable increase of 17% compared to the corresponding period in 2022.

In Career and Technical Education:

- Since our last audit, students have earned more than 7,000 certifications, including a 20% increase in industry certifications from the 2021-2022 to the 2022-2023 school years.
- Based on industry certifications earned, \$2.75 million dollars has been returned back to programs to support Career and Technical Education programs.
- With an increase of 60.38% in enrollment of elementary and middle school students, we offer students courses that expose them to careers; specifically adding Agriculture, Criminal Justice, Culinary Arts, Cybersecurity, Entrepreneurship programs, and Orientation to Career Cluster courses to middle schools across our district.
- Looking closer at our local needs, we've strategically added EKG Technician, Entrepreneurship, Pharmacy Technician and Principles of Teaching programs at our high schools to increase opportunities for students to enroll.

With an increased focus on career and technical education courses at the elementary and middle school levels, there has been a 61% increase in student enrollment from the 2021-2022 to the 2022-2023 school years. We have continued to grow, both our programs and numbers, while keeping up with the increasing demands from the state, industry, and students. There is always opportunity for growth, but we are confident that we will continue to successfully navigate those hurdles, while providing a quality education to our citizens.



Please address inquiries regarding this report to:

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