

Quality Assurance and Compliance Onsite Monitoring Review for Career and Technical Education

Walton County School District

April 13 - 19, 2022

Final Report

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Florida Department of Education Division of Career and Adult Education Walton 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 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 Walton County School District (WCSD) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Mr. Russell Hughes, superintendent, on November 1, 2021. The designated representative(s) for the agency were Ms. Donna Cox and Mr. Chris Brown. The division's representative conducting the OSMR was program specialist Michael Swift, of the Quality Assurance and Compliance section.

V. WALTON COUNTY SCHOOL DISTRICT

ENROLLMENT:

CTE (possible duplication at program level): Secondary - 2,916; Postsecondary - 314

Finance

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

FY 2018-19			
Grants	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins Secondary	660-1619B-9CS01	\$ 103,991.00	\$ 23,399.71
Perkins Postsecondary	660-1619B-9CP01	\$ 64,263.00	\$ 4,427.87
Perkins Rural	660-1619B-9CR01	\$ 54,643.00	\$ 854.11
FY 2019-20			
Grants	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins Secondary	660-1610B-0CS01	\$ 137,499.00	\$ 109,845.50
Perkins Postsecondary	660-1610B-0CP01	\$ 67,474.00	\$ 111.05
Perkins Rural	660-1610B-0CR01	\$ 58,222.00	\$ 1,108.23
FY 2020-21			
Grants	Grant Number	Grant Amount	Unexpended
Perkins Secondary	660-1611B-1CS01	\$ 112,787.00	\$ 55,974.33
Perkins Postsecondary	660-1611B-1CP01	\$ 81,882.00	\$ 3,981.57
Perkins Rural	660-1611B-1CR01	\$ 49,071.00	\$ 51.91
CAPES Act Panid Credentialing	660-1230A-1CR02	\$ 170.240.00	\$ 8,42.62
CARES Act - Rapid Credentialing		\$ 179,249.00 \$ 105.010.00	,
CARES Act - CTE Infrastructure	660-1230A-1C002	\$ 105,910.00	\$ 0.00

Additional information about the provider may be found at the following web address: <u>https://www.walton.k12.fl.us/</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.

Onsite Visits

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

- Tivoli Building
- Emerald Coast Technical College (ECTC)

Entrance and Exit Conferences

The entrance conference for WCSD was conducted on April 13, 2022. The exit conference was conducted on April 19, 2022. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Chris Brown	Coordinator, Career and Technical Education	Х	Х
Donna Cox	Program Facilitator, Career Educations Facilitator	Х	Х
Wyndy Crozier	Director, Administration of Grants		Х
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	Х	Х
Orion Price	Program Specialist, QAC, FDOE	Х	

Interviews

Interviews were conducted as part of the OSMR. Interviews took place with CTE administrative staff and financial staff.

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, section F. A minimum of 30 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 WCSD Secondary and Postsecondary Perkins grants are managed by administrators with multiple years of experience in their respective program areas. In drafting their FDOE grant applications, the CTE grants follow the processes as outlined in the School Board Policy manual.
 - The Secondary and Postsecondary CTE coordinators are responsible for drafting and managing the district's Perkins grants. CTE career counselors and the supervisor of curriculum and instruction also assist in the drafting and management of the grants.
 - The grant applications are then submitted to the School Board and superintendent for final review and approval.
 - All grant amendments are approved via the same process, and the district aims to have all amendments approved by the state by May of the fiscal year.
 - As part of the required comprehensive local needs assessment (CLNA), secondary and postsecondary CTE administrative staff consulted with numerous individuals and entities across the WCSD service area. WCSD also enlisted programmatic recommendations from

students, teachers, individuals within the local workforce and special population groups. The list of stakeholders includes, but is not limited to:

- WCSD staff and instructors
- Secondary and postsecondary advisory committees
- Walton County Chamber of Commerce
- Florida Small Business Development Center
- Florida State University (FSU)
- Heartland Bank
- CareerSource (CS) Okaloosa Walton has an office on the campus of ECTC and provides valuable guidance on local workforce needs.
- The Economic Development Alliance (EDA)
- The district's CTE programs have very active and vocal advisory committees that contribute to the day-to-day activities of their respective program areas. These committees will also continue to provide ongoing consultation as it relates to the CLNA and program-specific needs.
- The district conducts annual professional development and training to ensure all CTE administrative staff are up to date on any changes that come from the federal and/or state level Department of Education. FDOE sponsored training events are also attended.
- **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.
 - WCSD utilizes Focus® as their management information system (MIS) to house and track student data such as records, grades and attendance.
 - The WCSD Career and Technical Education Guide provides guidance in regards to Perkins accountability measures, how Perkins measures are calculated and documenting/recording student data. The guide also covers a plethora of topics as it pertains to the district's CTE programs.
 - WCSD provided district policies and procedures on collecting and reporting industry certifications, program completers, occupational completion points and Career and Professional Education Act (CAPE) student data.
 - The district MIS programmer and MIS coordinator are responsible for supporting schools and district administration in the processes of collecting, verifying, reporting and managing student information.
 - In addition to the previously mentioned duties, the MIS programmer is responsible for assisting CTE personnel in collecting, organizing, analyzing, and interpreting data for the purpose of instructional and programmatic reviews. This information is vital for program improvement and future planning.
 - All of the data elements required of their local MIS were included in the system and verified during the monitoring review. Screenshots of each data element field were uploaded to the provider's OSMR ShareFile.
 - Student electronic files include "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA). This notification is located in the district Student Code of Conduct manual.
 - Samples of CTE student data were reviewed and verified for accuracy as part of the OSMR. No errors were found. All student records were provided by WCSD.

- C. <u>CURRICULUM AND INSTRUCTION</u> refer to those elements that contribute to student learning and skill acquisition.
 - WCSD offers Secondary CTE programs at multiple high schools and middle schools across Walton County, and Postsecondary programs at ECTC. The Magnet Innovation Center is a unique extension of South Walton High School focused on Science, Technology, Engineering, Art and Mathematics learning and instruction.
 - Through the leadership and vision of the district Superintendent, WCSD has vaulted itself into a top-five ranking among all Florida school districts. There has also been a demonstrative increase in industry certifications earned across the district.
 - Due to the unique demographics of Walton County, the district pays special attention to the varying needs across their service region. WCSD puts forth a lot of time and effort to ensure that targeted marketing campaigns extend to special populations and non-traditional learning groups throughout the county.
 - The View of Intentional Education Work (VIEW) team is responsible for conducting monitoring reviews of each school within the district. The VIEW team spends a day at a particular school site observing teaching practices, student interactions and student progress towards programmatic goals. After each review, the VIEW team meets with the school principal and administrative staff to discuss their observations and offer recommendations for continued school success. This also allows the district to better understand the varying needs of each school within the district.
 - WCSD offers CTE students multiple opportunities to participate in additional learning activities outside of the classroom.
 - Pre-apprenticeship programs for Lineman training
 - Work-based learning and on-the-job training (OJT)
 - Students participate in Career and Technical Student Organizations (CTSOs)
 - Along with the aforementioned activities, students have the opportunity to participate in college and career exploration programs such as FloridaShines and Advancement Via Individual Determination (AVID). AVID helps to prepare students to enter the workforce by providing the academic and behavioral skills they may not learn in a traditional classroom setting. Organization, time management, critical thinking, collaboration and problem-solving skills are the primary components of AVID.
 - WCSD and ECTC have a Memorandum of Understanding (MOU) with Chautauqua Rehabilitation and Nursing Center for Health Science students to participate in required clinical experiences.
 - High performing students within the Secondary CTE program are eligible to participate in Career Dual Enrollment. This allows students to earn postsecondary credits toward industry certifications while still in high school. Articulation Agreements are currently in place with ECTC and Northwest Florida State College.
 - A MOU is in place with CS Okaloosa Walton to provide numerous resources and trainings, in conjunction with ECTC, for those interested in Workforce programs or adult literacy services.
 - CTE instructors participate in ongoing training provided by FDOE, as well as annual professional development through the district. Instructors also participate in program-specific training and certifications programs. Additionally, training takes place annually to ensure guidance counselors are up to date on current CTE offerings throughout the district. This allows counselors to confidently work with students and assist them throughout their CTE journey.

- The Bureau of Exceptional Student Education ensures that no reasonable services and accommodations are denied to those students who self-declare a disability. Policies and procedures are in place to create an atmosphere in which students with disabilities can sustain and continue their learning with minimal detriment to the student.
- **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.
 - The district has policies and procedures on property management, equipment safety/storage and inventory reconciliation.
 - WCSD has policies and procedures that must be followed any time a piece of capital equipment is removed from its original location. Guidelines are also in place for the sale and disposal of grant-funded equipment and inventory.
 - The property control accountant is responsible for ensuring all capital assets are tracked and maintained within the inventory management system, but a site designee at each school is the custodian of all equipment at his/her location.
 - WCSD has policies and procedures in the event that a piece of property has been lost, stolen or vandalized. Each site (school) designee is responsible for notifying the appropriate law enforcement agency if the item is believed to have been stolen. Written notification must be made to the district office and superintendent regardless if the item is stolen or lost.
 - No instances of lost or stolen property have been recorded over the past three fiscal years.
 - As part of the OSMR the QAC team conducted an inventory search at ECTC. All inventoried items were located and found in the appropriate locations according to inventory records.
 - The district conducts inventory once per fiscal year of all capital assets with a value of \$500.00 or more. Each school and/or program site is given a property record report that outlines all tangible personal property to be located during said inventory. Upon conclusion of the annual inventory process, each site designee shall draft a report that documents any equipment not found, and offers recommendations for the disposition of obsolete and surplus equipment and equipment beyond economical repair.
- 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.

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

- MIS data quality checklists
- School Board policy manual
- 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 w/supporting documents
- CLNA advisory committee records and stakeholder records
- Coronavirus Aid, Relief and Economic Security (CARES), Act supporting documentation
- Inventory records
- Student handbook
- Procurement records
- Exceptional Student Education manual
- 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
- 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.
 - Skyward® is used as the district's enterprise resource planning (ERP) and financial management system. When applicable, Skyward® is also used as the district contract management system to track deliverables, invoices and payments. When applicable, all contracts are reviewed and approved by district grants administration and the WCSD attorney's office.
 - The district's Board Policy Manual ensures the efficient management of CTE grant funds. The following components of the manual were reviewed:
 - Property control
 - Grants and special program funding
 - Accounting and control procedures
 - District budget policies
 - Methods of procurement
 - Contract management
 - Conflict of interest
 - Once programmatic needs are determined and written into the grant application, all grant expenditures are reviewed and approved by the Coordinator of Instructional Support Services and the district Chief Financial Officer prior to submission to the state. Purchase orders are only created and authorized for items approved by FDOE.
 - When an electronic purchase request is initiated within Skyward®, the method of procurement is determined based on the purchase price of the item(s). The WCSD Purchasing and Procedures Manual mandates the following approval process when expending grant funds:
 - Purchases under \$6,249.00 do not require competitive solicitation and may be purchased on the open market using practical and responsible judgment.
 - Purchases between \$6,250.00 and \$24,999.00 require a minimum of three quotes, sole source documentation or a state contract.
 - Any purchase over \$25,000.00 requires School Board approval, in addition to a minimum of three quotes, sole source documentation or a state contract.
 - These thresholds apply to the total sum of a purchase order, not the individual items included in the order.
 - Examples of procurement records were provided as part of the monitoring review process.

- WCSD will always make a reasonable effort to retain the services of small businesses, minority and/or women-owned businesses.
- WCSD does not use Perkins-funded purchasing cards, but the district does have policies and procedures for purchase requests, transaction reconciliations and processing.
- **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.
 - WCSD 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 include, but is not limited to:
 - CareerSource Okaloosa Walton
 - Chautauqua Rehabilitation and Nursing Center
 - Emerald Coast Technical College
 - Northwest Florida State College

VIII. RESULTS

WCSD 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'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 Walton County School District monitoring review on behalf of the department. Special thanks are offered to Mr. Chris Brown and Ms. Donna Cox for their participation and leadership during this process.

APPENDIX A

Walton 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: Walton County School District Program Type: CTE Monitoring Year: 2021-2022

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7			
Number of Years Since Last	5-6	5	3	V 10	30
Monitored	3-4	3	3	<u>X 10</u>	30
	0-2	1			
	Upper Quartile	7		<u>X8</u>	
Total Budget for all Perkins	Upper Middle	5	1 _		40
Grants Combined	Lower Middle	3	5		40
	Lower Quartile	1			
	4 or More	7			
Noushou of Doubing Cuants	3	5	5	<u>X 8</u>	40
Number of Perkins Grants	2	3			
	1	1			
Change in Management Information Systems (MIS)	Yes	7	- 0	X 6	0
from Previous Fiscal Year	No	0	U	<u>A 0</u>	v
Agency CTE Program Director Change from Previous Fiscal	Yes	7	7	<u>X 6</u>	42
Year	No	0			
	Upper Quartile	7			
Unexpended Funds from all	Upper Middle	5			
Perkins Grants Combined	Lower Middle	3	7	<u>X 4</u>	28
Terkins Grants Combined	Lower Quartile	1	-		
	0	0			
	Upper Quartile	7			
Number of Findings from the	Upper Middle	5			
Office of the Auditor General	Lower Middle	3	3	<u>X 4</u>	12
Since of the Auditor General	Lower Quartile	1			
	0	0			
	AGENCY RISK	SCORE:	192		

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

Please address inquiries regarding this report to:

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