

**Florida Department of Education  
Career and Adult Education  
Farmworker Career Development Program**

**Quality Assurance and Compliance**

**Fiscal Virtual Monitoring Review  
for  
Farmworker Career Development Program  
at  
Manatee County School District**

**PY 2024 – 2025**

**April 21 to 25, 2025**

**Final Report**

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Florida Department of Education (FDOE)  
Division of Career and Adult Education  
Farmworker Career Development Program (FCDP)  
**Manatee County School District**  
Quality Assurance and Compliance Monitoring Report

## PROGRAM MONITORING EXECUTIVE SUMMARY

The Farmworker Career Development Program at Manatee County School District is not meeting standards and is underperforming in the program's enrollment goals and placements at the time of monitoring. During virtual monitoring 10 files were reviewed. The files provide the information and documentation stipulated in the Eligible Policy and program regulations. The program is not on track to meeting their goals as indicated in Objective 1.b.2 Participants Recruitment Activities, 1.e.4, Assessment, 1.e.8: Placements and Objective 2.e, Performance Management. The FCDP Manatee County performance results at this moment do not meet the targets negotiated for the PY 2024-2025 (see Appendix B).

### Program Monitoring Results/Findings:

- **Findings - The FCDP Manatee County is low in performance goals at the time of monitoring, the program is in corrective action plan mode and will continue to be monitored in this area. (See Appendix B)**
- **Concerns – Indicator 1.e.4 Assessment Test for adult and youth**
- **Concerns - Review recruitment strategies to help achieve enrollment goals.**

### Results

#### Core Activity 1 Service Design and Delivery

##### Objective 1.a Planning and Program Design WIOA Section 121(b)(1)(B)

- Indicator 1.a.2: Service Design – RFA reviewed
- Indicator 1.a.1: Strategic Planning – Balance Performance reviewed
- Indicator 1.a.3: Coordination and Integration – Reviewed delivery process such as intake and assessment process. Balance Performance - Memorandum of Understanding – Policies

##### Objective 1.b Implementation

- Indicator 1.b.1: Designating Personnel, Staff, and Hiring
- Indicator 1.b.2: Participants Recruitment Activities-Review recruitment strategies to help enrollment.
- Indicator 1.b.3: Partnerships – MOU and Partnership Agreements
- Indicator 1.b.4: Required One-Stop Partner MOU-Partnership agreements forms reviewed.

##### Objective 1.e: Participants Services

The Participants program services Monitoring/ data Validation Checklist was used to review and validate the ten files reviewed during monitoring. The information was download or scanned into Document staff participant file. The eligibility documentation for each file was verified and participants services provided. The assessment test was missing in 9 of 10 files. The [assessment](#) test is used to develop the Individual Employment Plan (IEP) to ensure a positive outcome for each participant in the program. The files in EF include the Individual Employment Plan (IEP), Support Services (SS) (SS Tracking Forms were provided), Training Services was correctly identified in IEP and in the case notes. One participant's file was in the 2nd quarter retention follow-up, all documentation required was there in EF (staff document file) and case notes regarding participant follow-up were there.

- Indicator 1.e.1: Service Delivery–All the indicators below (1.e.2 to 1.e.9) were identified and validated using the Participant Program Services / Monitoring Data Validation Worksheets A, B and C. Before closing virtual program monitoring the ten files selected for monitoring were

reviewed with FCDP Manatee's staff and any corrections needed in those files were done at that time.

- Indicator 1.e.2: Priority of Services – Services – Policies - Labor Market – Veterans – Outreach
- Indicator 1.e.3: Eligibility /Enrollment – Worksheet A and B
- Indicator 1.e.4: Assessment - Assessment Test - The assessment tests (TABE or CASAS) for adult and youth participants were missing on file.
- Indicator 1.e.5: Participant Service Plan: (Individual Employment Plan)
- Indicator 1.e.6: Support Services – Policy Support Services
- Indicator 1.e.7: Training Services – IEP – Activity Code 300
- Indicator 1.e.8: Placement - Placements are requirements as of the Monthly Balance Performance
- Indicator 1.e.9: Follow-up Services – Quarterly report

Objective 2.e: Performance Management

- Indicator 2.e.2: Progress Monitoring - The FCDP Manatee County has been identified as having low performance at the time of monitoring; the program is in corrective action plans and will continue to be monitored in this area.

## **FISCAL MONITORING EXECUTIVE SUMMARY**

The Manatee County School District FCDP was found to be fiscally compliant with applicable local, state, and federal laws, regulations and/or policies and procedures. All documentation reviewed was complete, accurate and submitted prior to monitoring. Quarterly desk top reviews will continue for quarters 3 and 4. A closeout review will be performed by desktop that will include the comptroller's office audit of final 599 report. Technical assistance was provided for staffing pattern updates and funding allocations and decreases based on project performance.

### **Fiscal Monitoring Results/Findings:**

- **No Findings (Issue that violates federal regulation or state statutes)**
- **No Commendations**
- **No Concerns (Issue that could result in decrease of funding for 2025-2026)**
- **No Recommendations (For the process of improvement)**

### Results

Manatee County School District policies and procedures were reviewed and found to be compliant with state laws, federal regulations and/or policies and procedures.

#### Core Activity 1: Service Design and Delivery

##### Indicator 1.b.1: Designating Personnel, Staff and Hiring:

- The FCDP staffing pattern is a minimum of 2.0 full-time equivalent (FTE) with a cap of 80% allocation of project funding to salaries and benefits. Manatee meets the staffing pattern requirement with 3 FTE and 74% salary and benefits allocation.

#### Core Activity 2: Grant Operations

##### Indicator 2.a.2: Prior Approval of Project Modifications:

- Program amendment 1 processed to reduce participant targets from 57 adults to 47 adults and from 48 youth to 47 youth (11 participant reduction). Budget amendment 2 to realign travel and participant budget line items is in process of review and approval as of 04/21/2025.

##### Indicator 2.a.3: Closeout Requirements:

- Project 410-4054C PY 2023-2024 was closed in fiscal compliance with 99% of the funds spent. Manatee performed a final amendment to move unspent participant funding to salaries and benefits to use 2023-2024 funding prior to 2024-2025 per United States Department of Labor (USDOL) guidance shared by the FCDP state office.

##### Indicator 2.b.1: Budget Controls:

- Budget Comparison, Tool E in Appendix C shows that Manatee FCDP amends funds as needed to achieve maximum project spending.

Indicator 2.c.3: Equipment:

- Manatee's FCDP-Funded property list in Appendix D includes one item over the \$1,000.00 threshold that was virtually monitored using photos. The printer is used for FCDP purposes only and was purchased in compliance with all policies.

Indicator 2.d.5: Contract Administration:

- CareerSource Suncoast One-Stop Career Center Memorandum of Understanding is current through 06/30/2026.

Indicator 2.g.1: Records Accessibility:

- Records were presented by way of submission of complete and organized documents prior to monitoring date.

(Effectiveness) Indicator 2.h.4: Organizational Chart

- Manatee's job descriptions were reviewed and discussed with Dr. Gansemer who explained the state job descriptions titles are derived from Manatee's Human Resources Department who compare the positions to what is offered at the state. They look at the job responsibilities and compare them to other positions in the district. All job descriptions must be approved by the school board.

Core Activity 3: Financial Management.

Indicator 3.a.1: Effectiveness and Efficiency of Operations:

- Project 410-4054C-4CFJ1 PY 2023-2024: Although Manatee FCDP did not achieve their performance goals, Manatee was fiscally efficient and amended budget lines items as needed to achieve 99% of project award spending. The planned participant goals and the project funding were reduced in project 410-4055C-5CFJ1 PY 2024-2025. Technical Assistance for decreased funding included a review of Award 410-4055C-5CFJ1/ [2024-2025 Farmworker Career Development Program Request for Application](#) Financial Consequences (page 4); Attachment E, Fiscal Management, Cost Standards and Program Non-Compliance Policy. Program Non-Compliance Policy results in a program finding, but funding decreases in funding shall not be considered penalties.

Indicator 3.b.3: Subrecipient's Financial Reporting:

- Monthly 599 project disbursement reports received by monthly deadlines. The February 2025 project disbursement report (DOE 599) was verified to Manatee's ledger amounts and coding.

Indicator 3.c.1: Cash Disbursements:

- Funding drawdown in FLAGS was equal to the disbursement report in February 2025. The new requirement for including brief justification took effect 03/19/2025. On 03/24/2025 Manatee sent the first justification.

Indicator 3.f.2: Financial Management Systems:

- Manatee's indirect cost rate of 4.74% is under FCDP 5% cap.

Indicator 3.g.1: Cost Allocation Principles:

- Documentation for February 599 verified accurate coding and reporting. Supporting documentation reviewed for accuracy and multiple signatures verified internal controls and separation of duties. All disbursements were allowed for project 410-4055C-5CFJ1.

Indicator 3.g.2: Cost Allocation Plan:

- Semi-Annual Time and Effort Certifications are up to date; all staff work 100% and are compensated 100% by FCDP funds.

## **I. PURPOSE OF MONITORING**

The purpose of monitoring is to identify the specific areas in which a provider is in compliance or non-compliance with federal law and regulations, state statutes and rules, and OMB Circulars. The timely identification of non-compliance provides a framework to make changes that are expected to result in programs becoming more efficient and effective. However, a comprehensive and multi-dimensional Quality Assurance System is a foundation for continuous improvement of services and systems both internally and externally. Our commitment to excellence supports accountability, collaboration, targeted technical assistance, continuous improvement and positive systemic change.

## **II. RISK BASED MONITORING**

Risk assessment is a process used to evaluate variables associated with workforce education grants and assign a rating for the level of risk to the Florida Department of Education and the Division of Career and Adult Education associated with each provider. The risk assessment is conducted by the Quality Assurance Team to determine the monitoring strategy appropriate for each provider. A range of monitoring strategies includes conference calls, improvement plans, full or partial self-assessment, grant reviews, etc., with the more comprehensive strategy such as an onsite visit, designated for providers deemed to be at higher risk.

## **III. PROTOCOLS**

Protocols have been developed for Farmworker Career Development Program and their fiscal components. The protocols include interview questions aligned with the regulatory requirements; forms and checklists to be used for the on-site visits and other monitoring strategies are included; additional documents addressing the individual processes have also been developed.

The FCDP Manatee strategy was determined to be a virtual, desktop review of both program and fiscal monitoring. Notification, Schedule, and a copy of the Monitoring Work File were sent to Dr. Gansemer, Executive Director of Adult, Career and Technical Education; Amanda Means, Grants Accountant; Anibal Rosario-Plana; FCDP Coordinator; Carolina Prokic, FCDP Bookkeeper and Mary Ann Guerrero, Case Manager, Recruiter. FCDP's representatives conducting the monitoring were Shirley Caban, Program Specialist IV and Julie Furlong, Program Specialist III. Monthly and quarterly reviews will continue throughout the program year. A fiscal close-out review will be performed at the end of the budget period. The final participant data will be assessed as performance.

## **IV. FCDP MONITORING RESOURCES**

As deemed necessary by the United States Department of Labor/Employment and Training Administration, on-site monitoring of FCDP direct service providers is completed on an annual basis that addresses areas of compliance including special investigations of specific grant awards. Collaboration and cooperation with Grants Management, the Inspector General's office, the Comptroller's office and others, as appropriate, is fundamental to the success of the Quality Assurance System. The monitoring work file is accessible on the following link: [FCDP Monitoring Work File](#) (PDF). The Monitoring Guides are accessible on the following links: [Core Monitoring Guide & NFJP Supplement](#).

## **V. AUTHORITY**

The FDOE receives federal funding from the United States Department of Labor (USDOL) for Workforce Innovation and Opportunity Act (WIOA) of 2014, Title I, Section 167 National Farmworker Jobs Program (NFJP), CFDA # 17.264 to strengthen the ability of eligible farmworkers and their families to achieve economic self-sufficiency. The program serves eligible farmworkers and their dependents that have socio-

economic and educational barriers, as identified by the United States Department of Labor. The FDOE, FCDP awards sub-recipients to eligible providers to administer local programs. FCDP must monitor sub-recipients to ensure compliance with the National Farmworker Jobs Program.

## VI. PRE-MONITORING REVIEW AND PREPARATION

Pre-Monitoring review and preparation activities included a request for documentation, review of documents and the development of a monitoring plan. Activities for each completed as listed below:

### Request for Documentation

- 02/06/2025: Monitoring Notification and Schedule emailed
- 02/19/2025: Presentation via TEAMS in FCDP Conference
- 04/14/2025: Documentation and entrance meeting requested by email
- 04/21/2025: Entrance meeting
- 04/21/2025 – 04/25/2025: Monitoring performed

### Review of Documents

- National Farmworker Jobs Program Guide, August 2022
- Core Monitoring Guide, February 2025, United States Department of Labor, Employment and Training Administration
- The National Farmworker Jobs Program (NFJP) Supplemental to the Core Monitoring Guide 2021
- Project Awards:
  - 410-4055C-4CFJ1 PY 2024-2025: Complete review
  - 410-4054C-4CFJ1 PY 2023-2024: Partial review included monitoring, budgets, and closeout
  - 410-4032B-3CFJ1 PY 2022-2023: Partial review included monitoring, budgets, and closeout

### Monitoring Plan

- Risk Assessment included in Appendix A concluded program and fiscal monitoring would be performed. Monthly and quarterly monitoring will continue through 2024-2025.
- 2024-2025 Monitoring Method: Virtual
- Core Monitoring Guide indicator questions for review and discussion chosen for review were included in the monitoring work file.

### Entrance and Exit Conferences

The entrance conference for FCDP Manatee County was conducted on April 21, 2025. Monitoring was performed from April 21 through April 25, 2025. The exit conference was conducted on April 25, 2025.

### Farmworker Career Development Program Virtual Compliance Monitoring Visit PY 2022-2023 Monitoring Sign-in

**Project: Manatee County School District**

**Entrance Date: 04/21/2025**

**Exit Date: 04/25/2025**

	Name <i>Please Print</i>	Title <i>Please Print</i>	Location	Email	Entrance	Exit
1.	Dr. Paul Gansemer	Executive Director, Adult Career & Technical Education	Virtual	<a href="mailto:GansemerP@manateeschools.net">GansemerP@manateeschools.net</a>	x	x
2.	Anibal J. Rosario Planas	FCDP Coordinator	Virtual	<a href="mailto:RosarioPlanasA@manateeschools.net">RosarioPlanasA@manateeschools.net</a>	x	x
3.	Carolina Prokic	Bookkeeper/Recruiter	Virtual	<a href="mailto:Prokicc@manateeschools.net">Prokicc@manateeschools.net</a>	x	x

4.	Mary Guerrero	Recruiter/Case Manager	Virtual	<a href="mailto:Guerre2M@manateeschools.net">Guerre2M@manateeschools.net</a>	x	x
5.	Rebeca Rodriguez	FCDP State Director	Virtual	<a href="mailto:Rebeca.Rodriguez@fldoe.org">Rebeca.Rodriguez@fldoe.org</a>	x	x
6.	Julie Furlong	Program Specialist III	Virtual	<a href="mailto:Julie.Furlong@fldoe.org">Julie.Furlong@fldoe.org</a>	x	x
7.	Amanda Means	Accountant, Grants	Virtual	<a href="mailto:MeansA@manateeschools.net">MeansA@manateeschools.net</a>	x	x
8.	Wendy Giron	Accounting Manager	Virtual	<a href="mailto:Gironw@manateeschools.net">Gironw@manateeschools.net</a>	x	x
12.	Shirley Caban-Tellez	Program Specialist IV	Virtual	<a href="mailto:Shirley.Caban-Tellez@fldoe.org">Shirley.Caban-Tellez@fldoe.org</a>	x	x

## VII. PROGRAM REVIEW

### Interviews

Interviews conducted with staff by email, telephone and team meeting during monitoring were performed from April 21 to 25, 2025.

## VIII. FISCAL MONITORING REVIEW

### Fiscal Records Review:

Financial ledgers, records and supporting documentation for the month of February 2025 were reviewed for coding and reporting compliance, internal controls, and processes. Participant supportive services forms reviewed for time sheet completion, signatures of receipt, and compliance with FCDP supportive services policy. Quarterly fiscal reviews used for personnel, salaries and benefits and spending targets. The 2023-2024 monitoring and project closeout reviewed for past performance and spending patterns. Specific local policies for each indicator verified to be compliant with state and federal laws, regulations and/or policies and procedures. Documents for monitoring were provided by Carolina Prokic prior to monitoring. Manatee County School District Policies and procedures were accessed on the following links: [School District of Manatee County Policy Manual https://www.manateeschools.net/Page/2183](https://www.manateeschools.net/Page/2183)

## IX. RESULTS

Fiscal results concluded Manatee FCDP was compliant in accordance with applicable local, state, and federal laws and/or policies and procedures.

The Farmworker Career Development Program at Manatee County School District is not meeting standards and is underperforming in the program's enrollment goals and placements. As for the virtual monitoring, they are not on track to meet their overall performance. Other areas where the FCDP Manatee staff needs to improve are participants' files. Some files reviewed have not followed the IEP memorandum for adult or youth. During monitoring, directions were provided to staff, the files were corrected, and documentation was entered into Employ Florida's data system. The FCDP Manatee will continue the Performance Improvement Plan (PIP) to provide guidance and orientation in the areas of recruitment and employment. The FCDP performance results at this moment do not meet the targets negotiated for the PY 2024–2025 (see Appendix B).

## X. POST-MONITORING ACTIVITIES

Once the 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 FCDP Director. Once the final report is approved, it will be forwarded to the agency supervisor and the designated contact persons.

Finally, the division will issue a closure notification to the agency supervisor and the designated contact persons. 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 FCDP Manatee County School District. Special thanks offered to Dr. Paul Gansmer, Executive Director of Adult, Career and Technical Education, Wendy Giron, Accounting Manager and Anibal Rosario-Planas, FCDP Coordinator, for their participation and leadership during this process.

APPENDIX A  
Risk Matrix  
FCDP Manatee County School District

Program Year 2024-2025												
Risk Assessment Calculation Based on PY 2023-2024												
Project Name: FCDP Manatee School District						Date: 12/18/2024						
Risk Factor	Criteria Scale	Value	Risk Factor Weight	Score	Total Points	Risk Factor	Criteria Scale	Value	Risk Factor Weight	Score	Total Points	
Previous Monitoring	Program Monitoring PY 2023-2024					Monitoring	Fiscal Monitoring PY 2023-2024					
	Finding	4	4	4	16		Finding	4	5	1	5	
	Concerns	3					Concerns	3				
	Observation	2					Observation	2				
	Recommendation	1					Recommendation	1				
	No Issues	0					No Issues	0				
Performance as of PY 2023-2024	Adult New Participants - % of goal met					Total Amount Agency Funding	>\$ 350,000	5	5	3	15	
	< 69%	4	4	4	16		\$300,001 - \$350,000	4				
	70% - 79%	3					\$200,001 - \$300,001	3				
	80% - 89%	2					\$100,001 - \$200,000	2				
	90% - 99%	1					< \$100,000	1				
	> 100%	0			Spending Patterns as PY 2023-2024 (From 599 )	100%	0	4	1	4		
	Youth Total Participants % of goal met					95% - 99%	1					
	< 69%	4	4	2		8					90% - 94%	2
	70% - 79%	3									85% - 89%	3
	80% - 89%	2									< 84%	4
	90% - 99%	1			Cost Per Participant PY 2022-2023	> \$3,500	5	2	0	0		
	> 100%	0				\$3,000 - \$3,499	4					
	Adult Entered Employment % of goal met					\$2,500 - \$2,999	0					
	< 69%	4	4	4		16					\$2,000 - \$2,499	0
	70% - 79%	3			Director Change	< \$1,999	0					
	80% - 89%	2				< 1 year	3	1	0	0		
	90% - 99%	1				1 - 2 years	2					
	> 100%	0				N/A	0					
	Youth Entered Employment % of goal met					Coordinator Change	< 1 year	3	1	3	3	
	< 69%	4	4	4	16		1 - 2 years	2				
	70% - 79%	3					N/A	0				
	80% - 89%	2			Total Score Program						72	
	90% - 99%	1			Total Score Finance						27	
	> 100%	0			Total Score						99	

Weight Scale	
Low Risk	Score 0 - 60
Medium Risk	Score 61 - 85
High Risk	Score 86 - 100
When program and finance score is 80 or above it can trigger full grant review.	

APPENDIX B  
BALANCE PERFORMANCE PY 2024-2025

Adult		PY 24-25		
37	Carry-over from PY 23-24	Plan	Actual	%
A1	New Participants	10	6	60%
B1	Entered Employment	19	19	100%
B3	Number Participants Exiting	19	4	21%
B4	Attained a Credential	10	6	60%
B5	Measurable Skill Gains	10	13	130%
C2	Training Services	9	13	144%
	Reportable Individual	8	4	50%
	Total Participants	47		

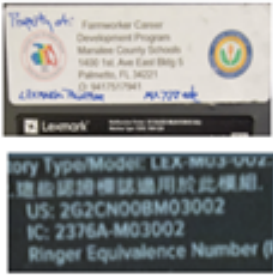
Youth		PY 24-25		
47	Carry-over from PY 23-24	Plan	Actual	%
A1	New Participants	0	6	100%
B1	Entered Employment	19	13	68%
B3	Number Participants Exiting	19	0	0%
B4	Attained a Credential	10	4	40%
B5	Measurable Skill Gains	10	24	240%
C2	Training Services	10	11	110%
	Reportable Individual	4	4	100%
	Total Participants	47		

APPENDIX C  
Budget Comparison - Tool E  
FCDP Manatee County School District

	Administrative Costs	Staff Cost	Related Assistance	Supportive Services	Other Program Costs	TOTALS
Year <u>2023-2024</u>	11% Difference Overall 4 Amendments Processed 99% Spent (\$2,003.66 unspent)					
% Budgeted	4%	77%	0%	8%	11%	100%
% Expended	4%	76%	0%	4%	16%	100%
Year <u>2022-2023</u>	No Difference Overall 1 Amendment Processed 100% Spending					
% Budgeted	4%	83%	0%	2%	11%	100%
% Expended	4%	83%	0%	2%	11%	100%

APPENDIX D  
FCDP-Funded Inventory  
FCDP Manatee County School District

Acquisition Date	Description of Item	Serial Number	Model Number	Other Identification Number	Unit Cost	Funding Sources Including the FAIN	Who Holds the Title	% Covered by Source
11/10/2021	Lexmark Printer MX722ade	2G2CN008M03002	N/A	School District of Manatee Cnty Tag MX722	2,500	FCDP Grant 4051B-1CFJ1	Manatee School District	100%

Location of Item	Use and Condition	Date of Inventory	Disposition Date	COVID 19 Donated or Loaned	Photos	Monitored 04/21/2025 by Photos
FCDP Manatee School District 1400 1st Ave. E Bldg. 5 Palmetto, FL 34224	Good	8/6/2024	n/a	n/a		JF