

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

**Quality Assurance and Compliance
Virtual Monitoring Review
for
Farmworker Career Development Program
at
Polk County School District**

PY 2024 – 2025

March 10 – March 14, 2025

Final Report

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

FISCAL MONITORING EXECUTIVE SUMMARY

The Polk County School District 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 in a timely manner. One concern for project spending with recommendations and technical assistance (see Appendix E). Quarterly desk-top reviews will continue for quarters three and four. A closeout review will be performed by desktop that will include the comptroller's office audit of final 599 report.

Fiscal Monitoring Results/Findings:

- **No Findings (Issue that violates federal regulation or state statutes)**
- **No Best Practices (Items that are implemented well)**
- **Concern (Issue that could result in a finding if it is not corrected)**
 - **3.a.1: Effectiveness and Efficiency of Operations of project spending in 2024-2025**
- **Recommendation (For the process of improvement) for full project spending (see Appendix E:)**
 - **Increase supportive services for existing participants per [FCDP SS Policy Update](#)**
 - **Provide (additional) materials and supplies and/or books to existing participants**
 - **Use travel funds meant for FCDP conference to increase travel for recruitment purposes**
 - **Purchase materials and supplies that may be needed for outreach and recruitment**
 - **Submit an amendment to move any unspent funding to salaries and benefits for the extension period (July and/or August and/or September).**

Results

Polk 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. Polk meets the staffing requirement with a staff of 4 FTE and was approved to exceed the cap by 1% for 81% allocation to salaries and benefits for project 530-4055C-5CFJ1.

Core Activity 2: Grant Operations

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

- Program amendment processed to reduce participant targets from 77 adults to 60 adults and from 63 youth to 54 youth (26 participant reduction). The participant services budget should be reviewed and amended for full project spending (see Appendix E.)

Indicator 2.a.3: Closeout Requirements

- Project 530-4054C PY 2023-2024 was closed in compliance with a recommendation for PY 2024-2025 to amend any unspent funding to salaries and benefits for the extension period for full project spending.

Indicator 2.b.1: Budget Controls

- Budget Comparison Tool (see Appendix C) demonstrates Polk County amends budget lines as needed.

Indicator 2.c.3: Equipment

- Polk's FCDP-Funded property list (see Appendix D) was virtually monitored using photos; all equipment is used for FCDP purposes only and was purchased in compliance with all policies.

Indicator 2.d.5: Contract Administration:

- Memorandum of Understanding and Infrastructure Agreement, One-Stop Career Center System by and Between CareerSource Polk and School Board of Polk County, Florida is current through June 30, 2026.

Indicator 2.g.1: Records Accessibility

- Records were presented by way of submission of complete and organized documents and immediate responses to additional records requests.

Core Activity 3: Financial Management

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

- Monthly 599 project disbursement reports received by monthly deadlines. The January 2025 project disbursement report (DOE 599) was verified to Polk County ledger amounts and coding.

Indicator 3.c.1: Cash Disbursements:

- Funding drawdown in FLAGS was equal to the disbursement report in January 2025.

Indicator 3.f.2: Financial Management Systems:

- Polk's indirect cost rate of 3.68% is under 5% FCDP cap.

Indicator 3.g.1: Cost Allocation Principles:

- Documentation for January 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 530-4055C-5CFJ1.

Indicator 3.g.2: Cost Allocation Plan:

- Semi-annual time and effort certifications are up to date; all staff are compensated 100% by FCDP and work 100% for FCDP.

PROGRAM MONITORING EXECUTIVE SUMMARY

The Farmworker Career Development Program at Polk County School District is not meeting standards and is underperforming in the program's enrollment goals and placements. As for the virtual monitoring, the program is not on track to meet their overall performance. Other areas where the FCDP Polk staff needs to improve are participants' files. One file reviewed has missing documents, and all the participants that enter the program do not have assessment tests at the time of enrollment. The [assessment](#) test is used to develop the Individual Employment Plan (IEP) to ensure a positive outcome for each participant in the program as per . Most of the files do not follow the Memorandum Policy on Case Notes. All the information must be related to the participants' progress in training or educational outcome.

The ten files selected for review were discussed with FCDP Polk's staff prior to the virtual program monitoring's closure. Any necessary corrections in those files were addressed at that time. A month was given to the staff to address the necessary corrections to ensure compliance with those files. After the corrections were made, the coordinator and case manager informed the state office of the completion via email, and a second review was done.

At this time, it is recommended to provide training in case notes and eligibility policies for FCDP Polk's staff. The FCDP Polk will continue the monthly Performance Improvement Plan to brainstorm/ideas in the areas of recruitment and employment goals. The FCDP performance results at this moment do not meet the targets negotiated for the PY 2024-2025 (see Appendix A). No emergency services or related assistance were offered or provided to Polk FCDP farmworker communities. These services are part of the NFJP/FCDP services [regulations](#).

Program Monitoring Results/Findings:

- **Findings (Issue that violates federal regulation or state statutes) - The FCDP Polk County is low in program performance goals (adult, youth and placement) at the time of monitoring, the program is in corrective action plan mode and will continue to be monitored in this area. (See Appendix A).**
- **Concern (Issue that could result in a finding if it is not corrected) – Not following the IEP policy for youth services and the 14 Elements Services form (20 CFR 681.460) were missing from all the youth files reviewed.**
- **Concerns – Not following the policies regarding Case Notes**
- **Recommendations (For the process of improvement) - Training all staff in the areas of Eligibility, and Case Notes policies**
- **Recommendations - Review recruitment strategies to help achieve enrollment area goals.**
- **Recommendation – Coordinate outreach and collaboration recruitment with CareerSource Polk (see MOU)**

Results

Core Activity 1, Service Design and Delivery

- Objective 1.a Planning and Program Design WIOA Section 121(b)(1)(B)
 - Indicator 1.a.1: Strategic Planning – RFA and Monthly Balance Performance reviewed
 - Indicator 1.a.2: Service Design – Monthly Balance Performance and enrollment reviewed
Finding – low performance in enrollment and employment– Program goal under 35% in adult and 0% in Youth
 - Indicator 1.a.3: Coordination and Integration – Reviewed delivery process such as intake and assessment process, Balance Performance - Memorandum of Understanding (MOU) – Policies
- Objective 1.b Implementation
 - Indicator 1.b.1: Designating Personnel, Staff, and Hiring
 - Indicator 1.b.2: Participants Recruitment Activities – See Indicator 1.a.2 Low program enrollments for adult and youth.
 - Indicator 1.b.3: Partnerships – MOU and Partnership Agreements reviewed
 - Indicator 1.b.4: Required One-Stop Partner – MOU and Partnership agreements forms reviewed. FCDP Polk does not show outreach/ recruitment partnership with CareerSource. (see MOU for more information)
- Objective 1.e: Participants Services
During monitoring process ten files were reviewed as part of the monitoring process One participant's file was in the 2nd quarter retention follow-up. All documentation required for that file was there in EF (staff document file) and a case note regarding participant follow-up was there.
All Youth files were missing the 14 Elements Services form
 - 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 review were discussed with FCDP Polk's staff prior to the virtual program monitoring's closure. Any necessary corrections in those files were addressed at that time. A month was given to the staff to address the necessary corrections to ensure compliance with those files. After the corrections were made, the coordinator and case manager informed the state office of the completion via email, and a second review was done.
 - Indicator 1.e.2: Priority of Services – Services – Policies – Labor Market – Veterans – Outreach
 - Indicator 1.e.3: Eligibility /Enrollment – Worksheet A and B used, but Polk County FCDP has low enrollment. One file without documentation on eligibility.
 - Indicator 1.e.4: Assessment – Assessment Test – No assessment tests provided (TABE or CASAS) for adult and youth participants.

- Finding – No assessment test during intake process or IEP development.
 - Indicator 1.e.5: Participant Service Plan: Individual Employment Plan (IEP). No indication of completing the 14 elements form to youth participants. The program did not follow the Individual Education Plan policy with youth at the time of monitoring.
Concern – Youth participant services and IEP policy
 - Indicator 1.e.6: Support Services –The support services were not provided to participants on time. Participants received services after 6 months of service approved.
Concern – Support Services are not provided on time to participants as need to overcome barriers during training.
 - Indicator 1.e.7: Training Services – IEP – Activity Code 300 for training
 - Indicator 1.e.8: Placement – Placements are requirements as of the Monthly Balance Performance
 - Indicator 1.e.9: Follow-up Services – Documentation of employment and payments is in EF.
- Objective 2.e: Performance Management
- Indicator 2.e.2: Progress Monitoring - The FCDP Polk 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.

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 Polk monitoring strategy was determined to be a virtual, in-depth desktop review of fiscal and program monitoring. Notification, Schedule, and a copy of the Monitoring Work File were sent to Leann E. Bennet, Senior Director, Career Technical Adult and Multiple Pathways; Laura Webster, Assistant Director Career, Technical and Adult Education, Morgan Williams, FCDP Coordinator; Joy Richards, Senior Coordinator, Workforce Grants, Ashley Hardwick, Senior Manager, Budget ; Hunter Gamber, Senior Coordinator Workforce Operations and Shiril Varghese, Analyst-Budget Coordinator on February 21, 2025. FCDP's representatives conducting the monitoring were Julie Furlong, Program Specialist III for fiscal compliance and Shirley Caban, Program Specialist IV, for program compliance. 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
- 02/21/2025: Documentation and entrance meeting requested by email
- 03/10/2025: Entrance meeting
- 03/10/2025 – 03/14/2025: Monitoring performed

Review of Documents

- National Farmworker Jobs Program Guide, June 2023
- 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:
 - 530-4055C-4CFJ1 PY 2024-2025: Complete review
 - 530-4054C-3CFJ1 PY 2023-2024: Partial review included monitoring, budgets, and closeout
 - 530-4032B-3CFJ1 PY 2022-2023: Partial review included monitoring, budgets, and closeout

Monitoring Plan

- Risk Assessment included (see Appendix B) concluded fiscal and program monitoring.
- 2024-2025 Monitoring Method: Virtual for program and fiscal
- Core Monitoring Guide indicator questions for review and discussion chosen for review were included in the monitoring work file.

VII. MONITORING REVIEW

Entrance and Exit Conferences

The entrance conference for Polk County School District was conducted on March 10, 2025. Monitoring The exit conference was conducted March 14, 2025.

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

Project: FCDP Polk County School District Entrance Date: 03/10/2025 Exit Date: 03/14/2025

	Name <i>Please Print</i>	Title <i>Please Print</i>	Location	Email	Entrance	Exit
1.	Leann Bennett	Senior Director, Career, Technical Adult and Multiple	Virtual	Leann.Bennett@polk-fl.net	x	x

		Pathways				
2.	Laura Webster	Assistant Director Career, Technical and Adult Education	Virtual	Laura.Webster@polk-fl.net	x	x
3.	Joy Richards	Senior Coordinator Workforce Grants	Virtual	Joy.Richards@polk-fl.net	x	x
4.	Hunter Gambrell	Senior Coordinator, Workforce Operations	Virtual	Hunter.Gambrell@polk-fl.net	x	x
5.	Morgan Williams	Farmworker Coordinator	Virtual	Morgan.Williams@polk-fl.net	x	x
6.	Ashley Hardwick	Budget Coordinator, Workforce and Multiple Pathways Education	Virtual	Ashley.Hardwick@polk-fl.net	x	x
7.	Peter Leon	Program Assistance Technician	Virtual	Peter.Leon@polk-fl.net		x
8.	Manuel Rodriguez	Program Assistance Technician	Virtual	ManuelRodriguez01@polk-fl.net		x
9.	Sasha Millan	Program Assistance Technician	Virtual	SashaMillan-Ramos@polk-fl.net		x
10.	Rebeca Rodriguez	FCDP State Director	Virtual	Rebeca.Rodriguez@fldoe.org	x	x
11.	Julie Furlong	Program Specialist III	Virtual	Julie.Furlong@fldoe.org	x	x
12.	Shirley Caban-Tellez	Program Specialist IV	Virtual	Shirley.Caban-Tellez@fldoe.org	x	x

VIII. FISCAL REVIEW

Fiscal Interviews

Fiscal interviews conducted with staff by email during fiscal monitoring were performed from March 10 through March 14, 2025.

Fiscal Records Review:

Financial ledgers, records and supporting documentation for the month of January 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 Coordinator Morgan Williams via shared link. Polk County Public Schools policies and procedures were accessed on the following links:

<https://go.boarddocs.com/fl/polk/Board.nsf/Public?open&id=policies>

<https://www.polkschoolsfl.com/about/departments>

IX. PROGRAM REVIEW

Interviews

Interviews conducted with staff by email, telephone and team meeting during monitoring performed from March 4 to March 22, 2024.

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 forwarded to the program supervisor and designated contacts.

Finally, the division issues a closure letter to forward to the program supervisor and designated contacts. 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 Polk County School District. Special thanks offered to Leann E. Bennett and Morgan Williams for their participation and leadership during this process.

APPENDIX A
Balance Performance Report PY 2024-2025

Adult		PY 24-25		
42	Carry-over from PY 23-24	Plan	Actual	%
A1	New Participants	18	6	33%
B1	Entered Employment	24	19	79%
B3	Number Participants Exiting	24	19	79%
B4	Attained a Credential	15	1	7%
B5	Measurable Skill Gains	15	0	0%
C2	Training Services	14	14	100%
	Reportable Individual	8	0	0%
	Total Participants	60		

Youth		PY 24-25		
44	Carry-over from PY 23-24	Plan	Actual	%
A1	New Participants	10	1	10%
B1	Entered Employment	22	11	50%
B3	Number Participants Exiting	22	13	59%
B4	Attained a Credential	8	0	0%
B5	Measurable Skill Gains	8	5	63%
C2	Training Services	8	6	75%
	Reportable Individual	4	0	0%
	Total Participants	54		

APPENDIX B
Risk Matrix
The School District of Polk County

Program Year 2024-2025													
Risk Assessment Calculation Based on PY 2023-2024													
Project Name: FCDP Polk 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	3	15		
	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	5	25		
	< 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	Youth Total Participants % of goal met					Spending Patterns as PY 2023-2024 (From 599)	100%	0	4	4	16
	< 69%	4	4	3	12	95% - 99%	1						
	70% - 79%	3				90% - 94%	2						
	80% - 89%	2				85% - 89%	3						
	90% - 99%	1				< 84%	4						
	> 100%	0	Adult Entered Employment % of goal met					Cost Per Participant PY 2022-2023	> \$3,500	5	2	0	0
	< 69%	4	4	4	16	\$3,000 - \$3,499	4						
	70% - 79%	3				\$2,500 - \$2,999	0						
	80% - 89%	2				\$2,000 - \$2,499	0						
	90% - 99%	1				< \$1,999	0						
	> 100%	0	Youth Entered Employment % of goal met					Director Change	< 1 year	3	1	2	2
	< 69%	4	4	4	16	1 - 2 years	2						
	70% - 79%	3				N/A	0						
	80% - 89%	2				Coordinator Change	< 1 year	3	1	3	3		
	90% - 99%	1					1 - 2 years	2					
	> 100%	0	N/A	0									
	Total Score Program								76				
	Total Score Finance								61				
	Total Score								137				

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 C
 TOOL E: BUDGET COMPARISON TOOL
 The School District of Polk County

	Administrative Costs	Staff Cost	Related Assistance	Supportive Services	Other Program Costs	TOTAL DIFFERENCE
Year <u>2023-2024</u>	2 Amendments processed (1 by FDOE) \$98,161.09 Unspent (72% Spent)					
% Budgeted	3%	77%	0%	11%	9%	12%
% Expended	3%	78%	0%	16%	3%	
Year <u>2022-2023</u>	2 Amendments processed for budget changes \$14,075.65 Unspent (96% Spent)					
% Budgeted	3%	69%	0%	14%	14%	6%
% Expended	3%	71%	0%	15%	11%	

APPENDIX D
FCDP FUNDED EQUIPMENT INVENTORY
The School District of Polk County

<u>Acquisition Date</u>	<u>Description of Item</u>	<u>Serial Number</u>	<u>Model Number</u>	<u>Other Identification Number</u>	<u>Unit Cost</u>	<u>Funding Sources Including the FAIN</u>	<u>Who Holds the Title</u>	<u>% Covered by Source</u>	<u>Location of Item</u>
8/31/2020	Morgan Williams	C02DH1CWP3YV	Laptop Macbook Pro 13"	Property of the School Board of Polk Co., FL Tag	\$1,289.00	FCDP Project 530-4050B-0CFJ1	Polk County School Board	100%	FCDP Office/7700 FL 544 Winter Haven, FL 3387
9/25/2009	Office #2 Copier	A11U011003155	Konica Minolta 350	Property of the School Board of Polk Co., FL Tag 40102945	\$2,630.00	FCDP 530-4053A-2CFJ1	Polk County School Board	100%	300 E Bridgers Ave Auburndale, FL 33830
12/5/2017	Office Copier	A9HH011007341	Konic Minolta 458	Property of the School Board of Polk Co., FL Tag	\$3,462.58	FCDP 530-4058B-8CFJ1	Polk County School Board	100%	FCDP Office/Traviss 3225 Winter Lake Rd. Lakeland FL 33803
8/16/2022	Office Copier	AC76011007155	Konica Minolta Bizhub 450i	Property of the School Board of Polk Co., FL	\$4,193.82	FCDP 530-4051B-1CFJ1	Polk County School Board	100%	FCDP Office/7700 FL 544 Winter Haven, FL 3396
10/25/2023	HP Elitebook Laptop / Manuel Rodriguez	5CD338DB9D	HP Elitebook 650 G9	Property of the School Board of Polk County SAP Tag: 600043301	\$964.34	FCDP 530-4054B-4CFJ1	Polk County School Board	100%	FCDP Office/7700 FL 544 Winter Haven, FL 3396

<u>Use and Condition</u>	<u>Date of Inventory</u>	<u>Disposition Date</u>	<u>Photos</u>	<u>Program Specialist Review</u>
Good	09/2024-10/2024	N/A		JF 03/11/2025
See Disposition Tab	09/2024-10/2024	7/1/2022		JF 03/11/2025
Good	09/2024-10/2024	N/A		JF 03/11/2025
Good	09/2024-10/2024	NA	 	JF 03/12/2025
Good	N/A (under \$1,000)	NA		N/A (Under \$1,000.00)

APPENDIX E CONCERN

3.a.1: Effectiveness and Efficiency of Operations The School District of Polk County

Per Monitoring Work File, Post-Monitoring Activity: Findings and corrective actions will be identified using the following criteria as explained in further detail in the Core Monitoring Guide, August 2018, United States Department of Labor, Employment and Training Administration [2018 Core Monitoring Guide.pdf](#), page 25.

Four C's

- Condition (Clear, concise and specific statement describing the violation)
- Cause (Statement that explains why the condition occurred)
- Criteria (Standards or legal requirements that are being violated)
- Corrective Action (Actions that eliminate the cause, correct or cure the condition and allow symptoms to disappear)

Condition for Concern:

- \$98,161.09 (28%) of project funding not expended in PY 2023-2024
- Quarter 2 under target for performance or supportive costs and program costs for PY 2024-2025

Causes for Concern:

- Project 530-4054C-4CFJ1 PY 2023-2024:
 - Funding for PY 2023-2024 was not used prior to using 2024-2025 funding
 - 2023-2024 Participant targets not met
 - Amendment for budget changes not submitted as recommended in quarter 3
- Project 530-4055C-5CFJ1 PY 2024-2025 changes that affect the budget
 - Program amendment 1 decrease of 26 participants will affect participant costs
 - Virtual FCDP Conference will affect travel budget

Criteria for Concern: 3.a.1:

- **Federal Regulations** [200.302](#) Financial Management, (5) Comparison of expenditures with budget amounts, [200.400](#) Policy Guide (c) The recipient and subrecipient, in recognition of their unique combination of staff, facilities, and experience, are responsible for employing organization and management techniques necessary to ensure the proper and efficient administration of the Federal award.
- **FCDP Policy:** Award/ RFA: Attachment E, Special Conditions for WIOA, Section 167 Project Awards Form:
Program Non-Compliance Policy
The sub-recipient agrees that the FDOE may discontinue the project award, not refund the sub-recipient, or impose special conditions if the sub-recipient has failed to provide services specified herein or in the project award or failed to achieve goals and identified performance standards.
- **FCDP Policy:** Request for Application (RFA Discretionary) 2024-2025 Farmworker Career Development Program (FCDP) [Fiscal Year 2024/202](#)

Financial Consequences

The grant manager shall periodically review the progress made on the activities and deliverables listed. If the sub-recipient fails to meet and comply with the activities/deliverables established in the grant or to make appropriate progress on the activities and/or towards the deliverables and they are not resolved within two weeks of notification, the grant manager may approve a reduced payment or request the sub-recipient redo the work or terminate the grant. Lack of goal/performance targets attainment may result in fund reductions. The grant manager must assess one or more of these consequences based on the severity of the failure to perform and the impact of such failure on the ability of the sub-recipient to meet the timely and desired results.

These financial consequences shall not be considered penalties.

Corrective Action for Project 560-4055C-5CFJ1 PY 2024-2025 Concern:

Submit amendments as needed to readjust budget line items for full project spending.

The recommendations for full project spending in 2024-2025 are listed below:

1. Increase supportive services for existing participants per FCDP [22-03 Supportive Services Policy](#)
2. Provide (additional) materials and supplies and/or books to existing participants
3. Use travel funds meant for FCDP conference to Increase travel for recruitment purposes
4. Purchase materials and supplies that may be needed for outreach and recruitment
5. In June 2025 submit amendment to move any unspent funding to salaries and benefits for the extension period (July, August and/or September) *Note: Salaries and benefits cannot be backdated*

Technical Assistance for Corrective Actions:

1. **Increase in Supportive services (SS) per [22-03 Supportive Services Policy](#)**
Review existing participants needs and increase to adjust for decrease in participant targets
(Example: keep list of participants measurable skill gains and if budget allows, give additional stipend)

January 599 Allowances Column (7) shows \$28,583.50 unobligated funds available

(A) District/Agency Name: Polk County PS			FLORIDA DEPARTMENT OF EDUCATION PROJECT DISBURSEMENT REPORT - JANUARY 2025 Workforce Innovation and Opportunity Act, Title I, Section 167 Migrant and Seasonal Farmworkers <input checked="" type="checkbox"/> Interim Report <input type="checkbox"/> Final Report (INSTRUCTIONS ON PAGE 3)			(F) Agency Number: 530	
(B) Project Name: FCDP						(G) Grant Number: 4055C	
(C) Effective Approval Date: 7/1/2024						(H) Project Code:	
(D) Termination Date: 9/30/2025						(I) Contact Person Name: Shiril Varghese	
(E) Total Project Funds: \$ 316,260.00						(J) Phone: 863-457-4704X704	
(1) Function Code	(2) Object Code	(3) Description of Disbursement	(4) Budget Amount	(5) Total Disbursements As of 1/31/25	(6) Obligations	(7) Unobligated Balance	(8) Current Disbursement Reported
SUPPORTIVE SERVICES							
9100	790	ALLOWANCES	\$ 32,935.00	\$ 4,351.50		\$ 28,583.50	\$ 295.00

101S Allowances Budget for SS Training Attendance, Measurable Skill Gain and Entered Employment

(1)	(2)	(3)	(4)	(5)
FUNCTION	OBJECT	Account Title and Narrative	FTE POSITION	AMOUNT
9100	790	<u>Allowances:</u> Stipends for all Supportive Services.		\$ 32,935.00

Copy of Supportive Services for Allowances Line Item:

Training Attendance - Chose one option					
Category		Amount of Stipend - Up to	Notes	Documentation	Site Specific Instructions
Attendance	1	\$3.00 per hour	Training programs must be on the sites approved TOL and offered through an approved vendor on the sites approved Vendor list. Training must be reference on participants IEP. Online training and high school is not eligible for training attendance category. \$5,000 maximum allowed to be issued to participant during entire participation.	Signed timesheets must be submitted to validate hours in training and uploaded in Employ Florida (EF) with proof of payment.	Enter Site Specific Instructions
Attendance	2	\$10 per day		Signed timesheets must be submitted to validate days in training and uploaded in Employ Florida (EF) with proof of payment.	Enter Site Specific Instructions
Attendance	3	Bus Pass		Bus Passes purchased to allow participant to attend training. Bus pass should be purchased in the most cost effective way, i.e. monthly, etc. and uploaded in EF with proof of payment.	Enter Site Specific Instructions
Attendance	4	Unpaid Internships / Work Experience		May use Attendance options 1 - 3 to pay for time spent in unpaid internship or work experience. Timesheets must be submitted to validate time in training and uploaded in EF with proof of payment.	Enter Site Specific Instructions
Attendance	5	GED / ESOL	Maximum allowed \$500	May use Attendance options 1 - 3 to pay for time spent in GED or ESOL training. Timesheets must be submitted to validate time in training and uploaded in EF with proof of payment.	Enter Site Specific Instructions

Measurable Skill Gain					
Category		Amount of Stipend - Up to	Notes	Documentation	Site Specific Instructions
MSG	1	\$100	Any participants enrolled in an education or training program leading to a recognized postsecondary credential or employment (Adult - OJT) that obtains a countable MSG per program year. Will not be allowable if MSG has already been obtained that Program Year. Must be entered in EF in the quarter received.	MSG must be entered in EF with documentation uploaded with proof of payment. Allowable MSGs: Postsecondary Transcript / Report Card or Secondary Transcript / Report Card or Training Milestone or Skills Progression.	Enter Site Specific Instructions
Post - TABE/CASAS	2	\$100	Any participant who needs a post test (TABE or CASAS). If a participant was not basic skills deficient (BSD) or is not enrolled in an education or training program they do not need to post test. May be issued once per program year for up to 3 years if the participant remains BSD.	Check EF to see if participant is BSD before issuing services and testing. Posttest Documentation must be entered in EF and uploaded with proof of payment. Must score high enough to be enterable into the system.	Enter Site Specific Instructions
Training Completion	3	\$100	Any participant enrolled in an education or training program (excluding OJT and customized training) who either: obtained a recognized postsecondary credential, obtained a secondary school diploma or its recognized equivalent.	Participants who achieve multiple credentials should be reported based on the highest credential attained for that period of participation. Credential documentation must be entered in EF with proof of payment.	Enter Site Specific Instructions
State Licensure	4	\$100	Any participant enrolled in an education or training program (excluding OJT and customized training) who obtained a state or nationally recognized licensure by passing an exam.	Licensure documentation must be entered in EF and uploaded with proof of payment.	Enter Site Specific Instructions

Category		Amount of Stipend - Up to	Notes	Documentation	Site Specific Instructions
Placement		\$400	Any participant who has entered employment at a wage rate of at least \$10 per hour working full time and is submitted for closure after payment.	Documentation of Employment with proof of payment. May only be issued once. Payment must be made before participant is closed out of the program.	Enter Site Specific Instructions

2. Provide (additional) materials and supplies and/or books to existing participants

January 599 Materials and Supplies-Clients shows \$2,413.00 unobligated funds available

(A) District/Agency Name: Polk County PS		FLORIDA DEPARTMENT OF EDUCATION PROJECT DISBURSEMENT REPORT - JANUARY 2025 Workforce Innovation and Opportunity Act, Title I, Section 167 Migrant and Seasonal Farmworkers				(F) Agency Number: 530	
(B) Project Name: FCDP						(G) Grant Number: 4055C	
(C) Effective Approval Date: 7/1/2024		<input checked="" type="checkbox"/> Interim Report <input type="checkbox"/> Final Report (INSTRUCTIONS ON PAGE 3)				(H) Project Code:	
(D) Termination Date: 9/30/2025						(I) Contact Person Name:	
(E) Total Project Funds: \$ 316,260.00						(J) Phone:	
						863-457-4704X704	

(1) Function Code	(2) Object Code	(3) Description of Disbursement	(4) Budget Amount	(5) Total Disbursements As of 1/31/25	(6) Obligations	(7) Unobligated Balance	(8) Current Disbursement Reported
OTHER PROGRAM COSTS							
5300	510	MATERIALS AND SUPPLIES-CLIENTS	\$ 2,413.00	\$ -		\$ 2,413.00	

101S Approved Materials and Supplies Budget for SS Tools/Supplies and Uniforms:

FUNCTION	OBJECT	Account Title and Narrative	FTE POSITION	AMOUNT	
5300	510	Materials and Supplies- Clients: Classroom supplies, notebooks, backpacks, tools, uniforms and other supplies for students to attend class training for employment.		\$2,413.00	JW
				\$ 2,000.00	

Copy of Supportive Services for Materials and Supplies and Books

Note: An amendment can be submitted to add a new budget line for Object 520/529 for Books/eBooks

FCDP Supportive Services					
Training Services					
Category		Amount of Stipend - Up to	Notes	Documentation	Site Specific Instructions
Training	1	\$15,000 maximum allowed to be issued to participant during entire participation.	Training programs must be on the sites approved TOL and offered through an approved vendor on the sites approved Vendor list. Training must be reference on participants IEP. Reimbursements to participants who have made the payment to the vendor is allowable, as long as proof of payment is provided.	Tuition Payments made directly to a training institution on behalf of the participant.	Enter Site Specific Instructions
Tools / Supplies	2			Payments made directly to an approved vendor for tools and or supplies that are required for the participant in training. Itemized list of required tools and supplies is required.	Enter Site Specific Instructions
Books	3			Payments made directly to an approved vendor for books that are required for the participant in training. Itemized list of required books is required.	Enter Site Specific Instructions
Uniforms	4			Payments made directly to an approved vendor for uniforms that are required for the participant in training. Itemized list of required uniforms is required.	Enter Site Specific Instructions

Note: Training costs on SS would be allocated to Tuition and Fees-Clients

January 599 Tuition and Fees-Clients shows \$1,872.31 unobligated funds available

(A) District/Agency Name: Polk County PS		FLORIDA DEPARTMENT OF EDUCATION PROJECT DISBURSEMENT REPORT - JANUARY 2025 Workforce Innovation and Opportunity Act, Title I, Section 167 Migrant and Seasonal Farmworkers				(F) Agency Number: 530	
(B) Project Name: FCDP						(G) Grant Number: 4055C	
(C) Effective Approval Date: 7/1/2024		<input checked="" type="checkbox"/> Interim Report <input type="checkbox"/> Final Report (INSTRUCTIONS ON PAGE 3)				(H) Project Code:	
(D) Termination Date: 9/30/2025						(I) Contact Person Name:	
(E) Total Project Funds: \$ 316,260.00						(J) Phone:	
						863-457-4704X704	

(1) Function Code	(2) Object Code	(3) Description of Disbursement	(4) Budget Amount	(5) Total Disbursements As of 1/31/25	(6) Obligations	(7) Unobligated Balance	(8) Current Disbursement Reported
5300	730	TUITION AND FEES-CLIENTS	\$ 2,000.00	\$ 127.69		\$ 1,872.31	

101S Approved Tuition Budget for SS Training

FUNCTION N	OBJECT	Account Title and Narrative	FTE POSITIO N	AMOUNT
5300	730	<u>Tuition and Fees:</u> To cover tuition costs for participants in training and lab, licensure and exam fees. This will benefit approx. 158 students attend ESOL, ABE, GED, and vocational training, some of which are not Pell eligible (DACA students).		\$ 2,000.00

3. Use travel funds meant for FCDP conference to Increase travel for recruitment purposes

January 599 Travel budget shows \$8,847.24 unobligated funds available

(A) District/Agency Name: Polk County PS (B) Project Name: FCDP (C) Effective Approval Date: 7/1/2024 (D) Termination Date: 9/30/2025 (E) Total Project Funds: \$ 316,260.00		FLORIDA DEPARTMENT OF EDUCATION PROJECT DISBURSEMENT REPORT - JANUARY 2025 Workforce Innovation and Opportunity Act, Title I, Section 167 Migrant and Seasonal Farmworkers <input checked="" type="checkbox"/> Interim Report <input type="checkbox"/> Final Report <i>(INSTRUCTIONS ON PAGE 3)</i>				(F) Agency Number: 530 (G) Grant Number: 4055C (H) Project Code: (I) Contact Person Name: Shiril Varghese (J) Phone: 863-457-4704X704	
(1) Function Code	(2) Object Code	(3) Description of Disbursement	(4) Budget Amount	(5) Total Disbursements As of 1/31/25	(6) Obligations	(7) Unobligated Balance	(8) Current Disbursement Reported
6300	330	TRAVEL	\$ 9,000.00	\$ 152.76		\$ 8,847.24	

101S Approved Travel Budget

FUNCTION N	OBJECT	Account Title and Narrative	FTE POSITIO N	AMOUNT
6300	330	<u>Travel:</u> All staff to attend state annual development Conference and the AFOP Conference . All to include per diems, registrations, hotel accommodations and air fare costs as per rate. Also to reimburse mileage for outreach and recruitment - For staff to perform duties as per their respective job descriptions		\$ 9,000.00

4. Purchase materials and supplies that may be needed for outreach and recruitment

Due to logo changes, you may need to print new materials. In addition, if there are materials or supplies that would assist in recruitment or outreach, a new line item could be added in an amendment (bulletin boards, brochure holders, office supplies or laptops).

January 599 Printed Materials budget shows \$1,500 unobligated available

(A) District/Agency Name: Polk County PS (B) Project Name: FCDP (C) Effective Approval Date: 7/1/2024 (D) Termination Date: 9/30/2025 (E) Total Project Funds: \$ 316,260.00		FLORIDA DEPARTMENT OF EDUCATION PROJECT DISBURSEMENT REPORT - JANUARY 2025 Workforce Innovation and Opportunity Act, Title I, Section 167 Migrant and Seasonal Farmworkers <input checked="" type="checkbox"/> Interim Report <input type="checkbox"/> Final Report <i>(INSTRUCTIONS ON PAGE 3)</i>				(F) Agency Number: 530 (G) Grant Number: 4055C (H) Project Code: (I) Contact Person Name: Shiril Varghese (J) Phone: 863-457-4704X704	
(1) Function Code	(2) Object Code	(3) Description of Disbursement	(4) Budget Amount	(5) Total Disbursements As of 1/31/25	(6) Obligations	(7) Unobligated Balance	(8) Current Disbursement Reported
6300	390	PRINTED MATERIALS	\$ 1,500.00	\$ -		\$ 1,500.00	

101S Approved Printed Materials Budget

(1)	(2)	(3)	(4)	(5)
FUNCTION	OBJECT	Account Title and Narrative	FTE POSITION	AMOUNT
6300	390	Printed Materials ; For recruitment and stakeholder meetings printed in Polk County School Board's Print Shop		\$ 1,500.00

A new budget line for recruitment and outreach materials could be added by amendment.

- In June 2025 submit amendment to move any unspent funding to salaries and benefits for the extension period (July, August and/or September) *Note: Salaries and benefits cannot be backdated, amendment would have to be received by ShareFile in July for July salaries and benefits to be charged to this project***

Per USDOL guidance, all funds are to be expended prior to using new grant funds. If funds cannot be spent on any of the above recommendations, an amendment can be submitted to move unspent funds to salaries and benefits through the extension period of the program year. The amendment line items must be completed as they were in the 101S

Example:

101S Approved Budget separates each of the benefits budget lines: separate line for Salary: Program Manager, but 3 Program Assistants share same line item

(1)	(2)	(3)	(4)	(5)	(6)
FUNCTION	OBJECT	Account Title and Narrative	FTE POSITION	AMOUNT	% Allocated to This Project
6300	160	SALARY: Program Manager , Manages all programmatic activities. Writes proposals, negotiates contracts. Plans and manages budget. Purchases equipment and supplies. Recruits, hires, trains and supervises personnel. Develops workshops and recruiting materials. Acts as public relations representative. Counsels and case manages clients. Communicates with all county, state and federal contacts. This salary is based on the district Salary Handbook, currently Pay Grade 19.1 for the 2024-2025 year.	1	\$ 53,521.00	100%
6300	210	Employee Benefits, Retirement (13.57%)		\$ 7,295.00	100%
6300	220	Employee Benefits, Social Security (7.65%)		\$ 4,095.00	100%
6300	231	Employee Benefits, Health (\$11,508 per employee)		\$ 11,508.00	100%
6300	232	Employee Benefits, Life Insurance (\$22.00 Per employee)		\$ 22.00	100%
6300	240	Employee Benefits, Workers Comp (.56%)		\$ 300.00	100%
6120	160	SALARY: (3) Program Assistance Technicians Perform extensive outreach within the farmworker community by visiting homes and schools. Recruit, enroll and provide appropriate follow-up for participants. Conduct intakes and develop IEP (Individual Education Plans). Deliver presentations to community groups and participants. Facilitate Employability Skills workshops in English and Spanish. Administer TABE tests in English and Spanish. Administer practice GED tests in English and Spanish. Case manage participants and maintain counseling records and documentation in Employ Florida System. These salaries are based on the district Salary Handbook, currently Pay Grade 15.1 for the 2024-2025 school year.	3	\$ 119,299.00	100%
6120	210	Employee Benefits, Retirement (13.63%)		\$ 16,261.00	100%
6120	220	Employee Benefits, Social Security (7.65%)		\$ 9,127.00	100%
6120	231	Employee Benefits, Health (\$11,508 per employee)		\$ 34,524.00	100%
6120	232	Employee Benefits, Life Insurance (\$22.00 Per employee)		\$ 66.00	100%
6120	240	Employee Benefits, Workers Comp (.56%)		\$ 669.00	100%

DOE 150 Amendment Form

		<u>EXAMPLE ONLY</u>			
F) Line Item Description					
Function	Object	Account Title and Narrative	FTE	Amount Increase	Amount Decrease
6300	160	Salary: (3) Program Assistance Technicians: Increase to cover salaries or partial salaries through extension period of the project as allowed per state and USDOL (July and August 2025)	1		
6300	210	Benefits: Retirement - Increase to cover July and August			
6300	220	Benefits: Social Security - Increase to cover July and August			
6300	231	Benefits: Health - Increase to cover July and August			
6300	232	Benefits: Life Insurance - Increase to cover July and August			
6300	240	Benefits: Workers Comp - Increase to cover July and August			
		(do same for Program Manager)			