



**Florida Department of Education
Division of Career and Adult Education
Farmworker Career Development Program (FCDP)
Quality Assurance and Compliance
Virtual Monitoring Review**

Polk County School District

May 4 – May 8, 2026

FINAL REPORT

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Division of Career and Adult Education
Polk County School District
Farmworker Career Development Program
Virtual Quality Assurance and Compliance Monitoring Review
Program Year 2025-2026

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 (FDOE) 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 (FCDP) 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; additional documents addressing the individual processes have also been developed.

IV. MONITORING STRATEGY

The Polk County School District FCDP monitoring strategy was determined to be virtual for program and fiscal monitoring. Monitoring notification letter, schedule and a copy of the monitoring manual were sent to Leann Bennett, Senior Director, Career, Technical, Adult & Multiple Pathways; Alysa Nolen, Senior Coordinator, Workforce Grants; Shiril Varghese, Budget Coordinator, Finance Department; Morgan Williams, Farmworker Coordinator and Program Assistance Technicians Peter Leon and Manuel (Manny) Rodriguez. The FCDP representatives conducting the monitoring were Jennifer (Jennie) Amico Program Specialist III for program and Julie Furlong, Program Specialist IV for fiscal. Monthly and quarterly fiscal and program 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.

V. 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 [FCDP Monitoring Manual](#), [NFJP-Core Monitoring Guide-Supplement](#) and additional monitoring information is available on the FDOE FCDP website on the following link: <https://www.fldoe.org/academics/career-adult-edu/farmworker-jobs-edu-program/>.

VI. 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's 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.

VII. 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 are listed below.

Documentation requested by email and virtual meetings via TEAMS on the dates below.

- 01/08/2026: Monitoring Notification and Schedule.
- 02/11/2026: Presentation via TEAMS.
- 03/23/2026: Program and fiscal monitoring rescheduled to 05/04 through 05/08/2026.
- 04/27/2026: Documentation and entrance meeting requested.
- 05/04/2026: Entrance meeting.
- 05/04 – 05/08/2026: Monitoring performed.

Documents reviewed prior to monitoring include the following.

- National Farmworker Jobs Program Guide, June 2023 ([NFJP Program Guide](#)).
- Florida Department of Education , Request for Proposal (RFP Discretionary), 2025-2026 Farmworker Career Development Program. ([FCDP RFP](#)).
- Project Awards:
 - 530-4056C-6CFJ1 program year (PY) 2025-2026: Complete review.
 - 530-4055C-5CFJ1 PY 2024-2025: Partial review included final performance and monitoring.
 - 530-4054C-4CFJ1 PY 2023-2024: Partial review included final performance and monitoring.

Monitoring Plan

- Risk assessment concluded fiscal and program monitoring.
- 2025-2026 Monitoring Method: Virtual
- [NFJP-Core Monitoring Guide-Supplement](#) (CMG) indicator questions for review and discussion were included in [FCDP Monitoring Manual](#) and are noted in the activities for reference.

Entrance and Exit Conferences

The entrance conference for Polk County School District was conducted on May 4, 2026. The exit conference was conducted May 8, 2026. The participants are listed below.

Farmworker Career Development Program
Virtual Compliance Monitoring Visit PY 2025-2026
Monitoring Sign-in

Project: FCDP Polk County School District **Entrance Date:** 05/04/2026 **Exit Date:** 05/08/2026

	Name	Title	Location	Email	Entrance	Exit
1.	Leann Bennett	Senior Director, Career, Technical, Adult and Multiple Pathways	Virtual	Leann.Bennett@polk-fl.net	x	x
2.	Alysa Nolen	Senior Coordinator, Workforce Grants	Virtual	Alysa.Nolen@polk-fl.net	x	x
3.	Morgan Williams	Farmworker Coordinator	Virtual	Morgan.Williams@polk-fl.net	x	x
4.	Shiril Varghese	Budget Coordinator	Virtual	Shiril.Varghese@polk-fl.net	x	x
5.	Peter Leon	Program Assistance Technician	Virtual	Peter.Leon@polk-fl.net	x	x
6.	Manuel (Manny) Rodriguez	Program Assistance Technician	Virtual	Manuel.Rodriguez01@polk-fl.net	x	x
7.	Julie Furlong	FCDP Program Specialist IV	Virtual	Julie.Furlong@fldoe.org	x	x
8.	Jennifer Amico	FCDP Program Specialist III	Virtual	Jennifer.Amico@fldoe.org	x	x

VIII. FISCAL MONITORING ACTIVITIES

FISCAL INTERVIEWS

No interviews were required for financial review. Documentation was submitted via password protected link. Requests for additional documentation were responded to immediately by email.

FISCAL RECORDS REVIEW

Financial ledgers, records and supporting documentation for the month of January 2026 were reviewed for coding and reporting compliance, internal controls and processes. Participant supportive services reviewed for financial documents completion and compliance with FCDP supportive services policy. Quarterly fiscal reviews used for personnel, salaries and benefits and spending targets. The 2024-2025 and 2023-2024 monitoring and project closeouts 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. The documents requested for monitoring were provided by Alysa Nolen, Shiril Varghese and Morgan Williams. School policies and procedures were accessed on the following links: <https://go.boarddocs.com/fl/polk/Board.nsf/Public?open&id=policies>
Human Resources <https://www.polkschoolsfl.com/about/departments>.

CMG Indicator 1.b.1:DESIGNATING PERSONNEL, STAFF AND HIRING refer to compliance with FCDP staffing patterns and required staff documentation for position descriptions and salary schedules.

- 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 County FCDP meets the staffing

requirement with a staff of 3.00 FTE and 66% allocation to salaries and benefits for project 530-4056C-6CFJ1.

CMG Indicator 2.a.3: CLOSEOUT REQUIREMENTS refer to the timelines and FCDP process of submitting final Project Disbursement Reports (DOE 599) and final funding drawdowns through the Florida Grant System (FLAGS).

- Project 530-4055C-5CFJ1 PY 2024-2025 was closed in compliance with 100% of \$316,250.00 funding spent.
- Project 530-4054C-4CFJ1 PY 23-24 closed with 72% of \$352,317.00 funding spent.

CMG Indicator 2.c.3: EQUIPMENT refers to any property/inventory items purchased with FCDP funding over the threshold of \$1,000.00.

- Polk FCDP Inventory list monitored virtually using photos. Two copiers and one laptop over \$1,000.00 threshold are in good condition. Disposition documentation is on file for an old copier.

CMG Indicator 2.d.5: CONTRACT ADMINISTRATION refers to review of all FCDP contracts and/or Memorandums of Understanding.

- Memorandum of Understanding (MOU) and Infrastructure Agreement One-Stop Career Center System by and between the Polk County Workforce Development Board, Inc., was reviewed and is current through June 30, 2026.

CMG Indicator 2.g.1: RECORDS ACCESSIBILITY refers to the submission and thoroughness of records used for this monitoring review.

- Records were presented by email and secured documents link. Submissions included complete and organized documents. Responses to questions and additional information were immediate.

CMG Indicator 3.a.1: EFFECTIVENESS AND EFFICIENCY OF OPERATIONS refers to adequate internal controls for effective and efficient project operations.

Quarter three (Q3) targets for spending and performance are at 75%. Polk has 85% total new participants. Spending of 58% is under target partially due to the extension period in PY 2024-2025. Provided an amendment is processed in quarter four, Polk will be able to achieve full project spending.

CMG Indicator 3.b.3: SUBRECIPIENT'S FINANCIAL REPORTING refers to the review in which the internal ledgers are compared to the DOE 599 report. Supportive documentation for each purchase/service is reviewed for coding and reporting accuracy. Timeliness of submissions is also reviewed.

- Monthly 599 project disbursement reports received by monthly deadlines. The January 2026 project disbursement report (DOE 599) was verified accurate to Polk ledger amounts and coding.

CMG Indicator 3.c.1: CASH DISBURSEMENTS refers to a review of funding drawdowns.

- Funding drawdown in FLAGS was equal to the disbursement reported in January 2026.
- Previous two awards final drawdowns were equal to the final project disbursements.

CMG Indicator 3.f.2: FINANCIAL MANAGEMENT SYSTEMS refers to the indirect cost rate cap for FCDP.

- Polk's indirect cost rate of 3.69% is under 5% FCDP cap.

CMG Indicator 3.g.1: COST ALLOCATION PRINCIPLES refers to the allowability of spending FCDP funding.

- Documentation for January 599 verified accurate coding and reporting amounts. Supporting documentation reviewed for accuracy and multiple signatures verified internal controls and separation of duties. All disbursements reviewed were allowed for project 530-4055C-5CFJ1.

CMG Indicator 3.g.2: COST ALLOCATION PLAN refers to reviewing time and effort certifications and/or monthly personal activity reports.

- Semi-Annual Time and Effort Certifications are up to date. All staff work 100% for FCDP and are compensated 100% by FCDP.

IX. PROGRAM MONITORING ACTIVITIES

PROGRAM INTERVIEWS

Interviews conducted with staff by email, telephone and team meeting during monitoring performed from May 4 to May 8, 2026.

PROGRAM RECORDS REVIEW

Ten participant files were selected for complete data and compliance monitoring. Performance reports, collaboration agreements, partnership MOU with CareerSource and FCDP Polk policies and procedures were also reviewed for the below activities.

CMG Indicator 1.a.2: SERVICE DESIGN refers to the monthly balance performance and enrollment review.

- **Recommendation:**
 - Continue with the PIP that is already in place.

CMG Indicator 1.a.3: COORDINATION AND INTEGRATION refer to a review of intake and assessment process, Balance Performance Reports, MOU with CareerSource and local policies.

- FCDP Polk is compliant.

CMG Indicator 1.b.2: PARTICIPANT RECRUITMENT ACTIVITIES refer to a review enrollment resulting from program outreach and participant recruitment.

- Youth enrollment is compliant.

CMG Indicator 1.b.3: PARTNERSHIPS refers to required collaboration agreements.

- Partnership agreements are current and on file in award.

CMG Objective 1.e: PARTICIPANT SERVICES refers to access to the full array of participant services

stipulated in the award agreement and the documentation for each service recorded.

- During monitoring process ten files were reviewed as part of the monitoring process. All documentation required for that file was in the Employ Florida (EF) system, staff document file and a case note regarding participant follow-up included.

CMG Indicator 1.e.1: SERVICE DELIVERY refers to a review of FCDP participant services.

- All the indicators below (1.e.2 to 1.e.9) were identified and validated using Participant Program Services/Monitoring Data Validation Check List before closing virtual program monitoring.

CMG Indicator 1.e.2: PRIORITY OF SERVICES refers to a review of services, policies, labor market, veterans and outreach.

- FCDP policies provided by staff were reviewed and found to be compliant.

CMG Indicator 1.e.3: ELIGIBILITY/ENROLLMENT refers to performance review and documentation compliance for participant eligibility and enrollment.

- FCDP Polk is low in the adult enrollment area.

CMG Indicator 1.e.4: ASSESSMENT refers to participant testing using approved methods.

- FCDP Polk provides assessments as part of the intake process.

CMG Indicator 1.e.6: SUPPORT SERVICES refers to a review of the services received by participants.

- The support services were provided to participants as part of the individual employment plan (IEP) process.

CMG Indicator 1.e.7: TRAINING SERVICES refers to compliance with training services and documentation.

- IEP – Activity Code 300 for training is accurate.

CMG Indicator 1.e.8: PLACEMENT refers to a review of performance in participants securing employment.

- **Concern:**
 - Low performance in enrollment and employment– Adult participants under 75%.

CMG Indicator 1.e.9: FOLLOW UP SERVICES refers to compliance with follow-up policies and documentation.

- Documentation of employment and payments is in EF.

CMG Indicator 2.e.2: PROGRESS MONITORING refers to monthly, quarterly and annual performance and compliance reviews.

- The FCDP Polk County has been identified as having low performance in adult services at the time of monitoring; the program is in a corrective action plan and will continue to be monitored in this area.

X. RESULTS

FISCAL MONITORING RESULTS

- No Findings (Issue that violates federal regulation or state statutes)
- No Concerns (Issue that could result in a finding if it is not corrected)
- No Recommendations (For the process of improvement)
- No Best Practices (Items that are implemented well)

FISCAL SUMMARY

The Polk 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 and accurate. 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.

PROGRAM MONITORING RESULTS

- 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)
- Recommendations (For the process of improvement)
 - Continue with PIP currently in place.

PROGRAM SUMMARY

The Farmworker Career Development Program at Polk County School District was found to be compliant. and all documentation required was provided. The program performance goals for adult services is under the goal of 75% for the third quarter. The program performance goals for youth services are compliant. The performance will be evaluated at the end of the program year to decide if the program will need an additional corrective action plan. (See appendix A).

All files reviewed during monitoring included information and documentation regarding eligibility and assessment tests, specifically TABE or CASAS. The program also offers participants the O*NET Interest Profiler test during the intake process. The file in EF included the Individual Employment Plan (IEP) and Support Services (SS). The SS Tracking Forms were provided during monitoring; all information was documented according to the SS Policy Memorandum. Training services were correctly identified in the IEP and the case notes for adult and youth services. One participant's file underwent first quarter retention follow-up. All required documentation was present in EF, staff document file and a case note regarding the participant follow-up was included.

XI. 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 Bennett, Alysia Nolen and Morgan Williams for their participation and leadership during this process.

Appendix A
Polk County School District
Farmworker Career Development Plan
Balance Performance Report
Quarter Three

Adult		PY 25-26		
	FCDP Polk	Plan	Actual	%
A1	New Participants	13	9	69%
B1	Entered Employment	18	9	50%
B3	Number Participants Exiting	18	8	44%
B4	Attained a Credential	9	4	44%
B5	Measurable Skill Gains	9	16	178%
C2	Training Services	12	10	83%
	Reportable Individual	8	0	0%

Youth		PY 25-26		
	FCDP Polk	Plan	Actual	%
A1	New Participants	9	9	100%
B1	Entered Employment	19	10	53%
B3	Number Participants Exiting	19	8	42%
B4	Attained a Credential	6	2	33%
B5	Measurable Skill Gains	6	6	100%
C2	Training Services	8	11	138%
	Reportable Individual	4	1	25%