



FLORIDA DEPARTMENT OF  
**EDUCATION**  
CAREER AND ADULT EDUCATION

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

**State College of Florida,  
Manatee-Sarasota**

**May 7, 2025**

**Final Report**

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Florida Department of Education  
Division of Career and Adult Education  
**State College of Florida, Manatee-Sarasota**  
**Perkins Career and Technical Education**  
**Quality Assurance and Compliance Monitoring Report**

## **I. INTRODUCTION**

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

## **II. AUTHORITY**

The Department receives federal funding from the U.S. Department of Education's Office of Career and Technical Education under the Carl D. Perkins Strengthening Career and Technical Education (CTE) for the 21<sup>st</sup> Century Act and for Adult Education (AE) under the Workforce Innovation and Opportunity Act of 2014. The Department awards sub-grants to eligible providers to administer local programs. The Department must monitor providers to ensure compliance with federal requirements, including Florida's approved state plans for CTE and Adult Education/Family Literacy. Each state shall have procedures for reviewing and approving applications for sub-grants and amendments to those applications, for providing technical assistance, for evaluating projects and for performing other administrative responsibilities the state has determined are necessary to ensure compliance with applicable statutes and regulations pursuant to 34 Code of Federal Regulations 76.770, Education Department General Administrative Regulations and the Uniform Grant Guidance 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 is designed to be utilized by any reviewer who is conducting an onsite or desk monitoring of any program currently administered by the Division. The guide includes a brief overview of each aspect of the monitoring design and the process, as well as objectives that can be used when agencies are monitored or reviewed. The guide can be found on the Division's website at <https://www.fldoe.org/academics/career-adult-edu/compliance/>.

## **IV. PROVIDER SELECTION**

Various sources of data are used throughout the implementation of the quality assurance system. The monitoring component of the system is risk-based. Risk assessment is a process used to evaluate variables associated with the grants and assign a rating for the level of risk to the Department and the Division. A risk matrix identifying certain operational risk factors is completed for each provider. The risk matrix for each program monitored is located in Appendix A. The results of the risk assessment process and

consideration of available resources are used to determine one or more appropriate monitoring strategy(ies) to be implemented.

The QAC office may apply any specific monitoring strategy to any federal or state-funded provider at any time. There may be circumstances that may warrant onsite monitoring, desk monitoring review or other strategies regardless of a provider's risk matrix score.

The State College of Florida, Manatee-Sarasota (SCF) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Mr. Tommy Gregory, President, on December 12, 2024. The designated representative for the agency was Ms. Erin Buckley, Director, Special Projects.

The Division's representative conducting the OSMR was Program Specialist Michael Swift of the QAC.

## **V. STATE COLLEGE OF FLORIDA, MANATEE-SARASOTA**

### **Finance**

The provider was awarded the following grants for fiscal years (FY) 2021-22, 2022-23 and 2023-24:

#### **FY 2021-22**

| <u>Grants</u>         | <u>Grant Number</u> | <u>Grant Amount</u> | <u>Unexpended</u> |
|-----------------------|---------------------|---------------------|-------------------|
| Perkins Postsecondary | 412-1612B-2CP01     | \$ 431,899.00       | \$ 16,516.60      |

#### **FY 2022-23**

| <u>Grants</u>         | <u>Grant Number</u> | <u>Grant Amount</u> | <u>Unexpended</u> |
|-----------------------|---------------------|---------------------|-------------------|
| Perkins Postsecondary | 412-1613B-3CP01     | \$ 455,431.00       | \$ 11,667.00      |

#### **FY 2023-24**

| <u>Grants</u>         | <u>Grant Number</u> | <u>Grant Amount</u> | <u>Unexpended</u> |
|-----------------------|---------------------|---------------------|-------------------|
| Perkins Postsecondary | 412-1614P-4CP01     | \$ 402,372.00       | \$ 11,038.73      |

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

<https://www.scf.edu/>.

## **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.

### **Onsite Visits**

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

- SCF – Bradenton Campus
- SCF – Lakewood Ranch

### **Entrance and Exit Conferences**

The entrance conference for SCF was conducted on May 7, 2025. The exit conference was conducted the same evening. The participants are listed below:

| Name                            | Title   | Entrance Conference | Exit Conference |
|---------------------------------|---|---------------------|-----------------|
| Stephanie Roy                   | Manager, Business Operations, SCF             | X                   |                 |
| Erin Buckley                    | Director, Sponsored Projects, SCF             | X                   | X               |
| Ron Serpliss                    | Director, Career and Technical Education, SCF | X                   |                 |
| Marvict Benkert                 | Coordinator, Special Projects, SCF            | X                   |                 |
| <b>Division Monitoring Team</b> |   |                     |                 |
| Michael Swift                   | Program Specialist, QAC                       | X                   | X               |
| Chuck Davis                     | Program Specialist, QAC                       | X                   | X               |
| Dantavia Davis                  | Program Specialist, QAC                       | X                   | X               |

#### Interviews

No interviews were required.

#### Records Review

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

### **VII. OBSERVATION**

- A. **ADMINISTRATION** refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.
- The SCF CTE grants and programs are managed by administrators with numerous years of experience within their respective program areas. The CTE Director and Director of Sponsored Projects work directly with administrators and faculty to determine the needs of each program area to be included in their grant applications. Additionally, the CTE Director is responsible for adherence to the terms, conditions and program standards of each federal award.
  - The Division grant manager for SCF reported that grant applications and amendments are routinely submitted on time and typically require little to no additional guidance. If revisions are needed, the CTE Coordinator submits those in a prompt manner.
  - As part of their 2023-24 comprehensive local needs assessment (CLNA), SCF CTE administrators consulted with numerous stakeholders and entities across their service area. Representatives from these stakeholder groups also provided insight into the workforce needs and opportunities for special student population students, as defined by law. The list of stakeholders includes, but is not limited to:
    - Career Edge and CareerSource Suncoast – Representatives of local workforce board
    - Manatee and Sarasota County school districts – Local secondary educational agency representatives
    - SCF CTE leadership – Postsecondary representatives
    - SCF Disability Resource Center (DRC) – Individuals with disabilities
    - Local business owners (private and public)

- All CTE programs have advisory committees that consist of local stakeholders and meet throughout the program year. Updates about current program performance are discussed, as well as discussions about future program needs and current industry trends. SCF provided advisory committee meeting records such as agendas, minutes and sign in sheets for all program areas.
- SCF conducts ongoing professional learning and training events to ensure all CTE administrative staff are up to date on any changes that come from the United States Department of Education or the Department. Division-sponsored training events are also attended. SCF provided multiple records of training and learning events.

**B. DATA AND ASSESSMENT** refer to all the data and assessment system components, including test administration, test security, data collection, entry, reporting and procedures. The use of data in program decision-making is also explored and commented on.

- SCF utilizes Banner® as its integrated Management Information System (MIS) and student information system. The MIS meets all Department requirements as defined by the Data Dictionary.
- SCF has written procedures for the collection, verification, analysis and reporting of student data. Division policies on the submission of student data are also adhered to and followed.
- Additionally, the Measurable Standards of Institutional Excellence manual provides guidelines on the college-wide academic outcomes assessment process. Each program area reviews their program learning outcomes and “Outcomes Crosswalk” annually as a part of the Annual Program Report to ensure they are sufficient and up to date with current industry requirements. If outcomes are found to need amending, the proposed amendments go to the Curriculum Development and Review Subcommittee of the Faculty and Academic Affairs Committee for approval. If approved, implementation will begin during the subsequent fall semester.
- Procedures are in place that outline the necessary steps to ensure that all student data reported by the college is valid, reliable and aligned with reporting requirements. Multiple checks and balances are in place to ensure the accuracy of data reported to the Department. Data is manually reviewed prior to being uploaded to Banner®. A “data validation” report is created within the MIS, then that report undergoes a cross-departmental review before it is submitted to the Department.
- All personnel involved in data entry and management receive regular training on data reporting procedures and compliance requirements. Additionally, CTE administrators attend Division events such as quarterly webinars and Management Information System Advisory Task Force meetings. Other professional learning events are attended when the opportunity is available.
- The Director of Institutional Reporting is responsible for the accuracy and validity of CTE student data submitted to the Department. This individual reports directly to the Associate Vice President (AVP) - Institutional Effectiveness. The Director of Institutional Reporting works with the AVP to facilitate local trainings and with other departments to educate them on the available data and the means by which data may be obtained. Job descriptions for the positions listed above were provided by the college.
- SCF provides students with the following notification(s) regarding the use and dissemination of student data:
  - Notification of social security number collection, usage and release.
  - Student authorization for access to educational records.
  - Use of student directory information.

- Student and parental rights provided by the Family Educational Rights and Privacy Act (FERPA).

When applicable, students may opt in or out of these notices at any time.

- Samples of CTE student data were reviewed and verified for accuracy as part of the OSMR. All student records were provided by SCF. Records reviewed included:
  - CTE postsecondary industry certifications
  - Postsecondary Adult Vocational program completers

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

- SCF offers CTE programs and services on all campuses within their service region. SCF campuses also serve secondary Dual Enrollment students from Manatee and Sarasota counties.
- SCF has a memorandum of understanding (MOU) with CareerSource Suncoast to provide services aimed at equipping CTE students and recent graduates with the tools and resources necessary to enter the workforce and be successful. CareerSource has multiple locations within the SCF service region, including an on campus location in Bradenton, Florida.
- CareerSource offers career guidance, training support and hands-on resources designed to bridge the gap between education and meaningful employment. Additional services include:
  - Job search and career development support
  - Labor Market insights
  - Skills assessments and workshops
  - Scholarships and training programs
  - Disability services
  - Support specifically designed for military members and families
- SCF offers students multiple opportunities to participate in additional learning activities outside of the traditional classroom environment, including career exploration and career development activities.
  - Dental Hygienist students participate in clinical community service events in which dental and other services are provided to local community members.
  - Health Sciences students work with a number of health and wellness centers across the SCF service region to gain clinical hours and on the job experience.
  - Experiential learning in the form of internships and work based learning are available for qualifying students.
  - Students enrolled in Early Childhood Education benefit from agreements with the School District of Manatee County (SDMC) and Sarasota County Schools (SCS) that allow them to work within the school districts as part of their curriculum.
  - Most CTE programs offer corresponding clubs and/or career and technical student organizations.
- As a result of their CLNA and labor market analysis, multiple new programs were implemented in the course of the years monitored. A sample of those programs include:
  - Music Production
  - Hospitality and Tourism
- SCF has an articulation agreement with SDMC and SCS that ensures all eligible students who graduate from either school district are guaranteed free admission to the college to pursue a number of Associate in Science degree programs or certificate programs. Students have up to two years post high school graduation to enroll.
- In compliance with the Americans with Disabilities Act (ADA) of 1990 and Section 504 of the Rehabilitation Act of 1973, no student who self-declares a disability is denied appropriate

- and reasonable accommodation as determined by the student's needs. The Assistant Director of Human Resources fulfills the role of the 504 Coordinator and shall provide information and develop procedures for the provision of reasonable accommodations (adaptive devices and/or auxiliary staff and services) to insure the inclusion and full participation of qualified students with disabilities. The SCF ADA Coordinator provides information and develops procedures to provide accommodations to qualified SCF employees with disabilities and to ensure the accessibility of the college's facilities to them.
- The DRC is responsible for ensuring equal access to all college services, programs and activities. Once a student self-declares a documented disability, the DRC assists them through the provision of reasonable accommodations, assistive technology, information, resources, services and skill development. A sample DRC intake form was provided by SCF.
  - SCF maintains multiple program advisory councils for each of its programs so industry partners can review the curriculum, outcomes, equipment and programs to ensure the programs stay aligned with industry standards
  - SCF offers ample professional learning and training to CTE administrators and staff. Administrators also participate in ongoing training provided by the Division, as well as annual professional learning through the college. Program-specific training and/or certifications are also completed as required.

**D. TECHNOLOGY AND EQUIPMENT** refers to a review of the technology and equipment used by students and instructors in the classroom; and addresses access, availability, innovation, use and condition.

- All inventory criteria set forth by federal, state and local guidelines are included within the college's fixed asset management system.
- SCF has policies and procedures to establish actions for purchasing, tracking and managing equipment acquired with federal grant funds in compliance with federal regulations and institutional policies. Policies include property management, equipment safety/storage, inventory reconciliation and inventory disposal. In addition to these policies and procedures, SCF has internal controls and procedures to govern loss prevention, transfer of property and the surplus of capital equipment.
- Each campus has dedicated staff that serve as the property custodian at his or her site, but the Manager of Business Operations is ultimately responsible for all college assets with a value greater than \$1,000.00. Additionally, this position is responsible for the monthly property records reconciliation process and manages the central services functions and associated staff. SCF provided a job description as part of the monitoring process.
- Monitoring staff conducted inventory reviews at two SCF campuses, and all inventory was accounted for and in its correct location. QAC staff verified all inventory at the \$5,000 threshold, as well as spot checked \$1,000 items for internal controls compliance. No issues were uncovered.
- Capitalized, non-capitalized and "high theft" assets are inventoried at least annually, and all inventoried property must match the records maintained within the inventory management system. Once the college-wide inventory is complete, a Fixed Asset Physical Inventory Summary Report is signed off on and approved by the Director of Business Services and the Vice President of Finance and Administrative Services.
- SCF did report two instances of tangible property that was not located during their most recent inventory review. The items were reported to the college Public Safety office for appropriate documentation. A Request for Write-Off form will be presented at the next Board of Trustees meeting. Upon approval, the items will be removed from inventory records. Supporting Documentation was provided by SCF.



- E. **EQUAL ACCESS** refers to compliance with federal non-discrimination laws' requirements relating to recruitment, enrollment, participation and completion of programs.
- SCF included the necessary policies required by the General Education Provisions Act (GEPA) and other federal laws, which ensure equal access and participation in programs regardless of sex, race, national origin, color, disability or age.
- F. **RECORDS REVIEW** refers to reviewing the records and documents that evidence compliance with federal and state rules and regulations. In addition, a sampling of financial and programmatic records is reviewed.

**Documents reviewed are:**

- Notification of social security number collection, usage and release
  - Student authorization for access to educational records
  - FERPA notification
  - Program academic plans
  - Data reporting policies and procedures manual
  - Time and effort reports
  - Student data
  - Operational policies and procedures
  - Purchasing Manual
  - Multiple MOUs
  - Dual enrollment articulation agreements
  - Advisory committee meeting records
  - Travel records
  - GEPA statement
  - Disability Services Manual
  - Academic support services
  - CLNA documentation
  - Professional learning records
- G. **FINANCIAL** refers to aspects of the federal fiscal requirements that providers must meet when expending federal funds, including financial management, procurement, inventory management and allowable costs.
- Banner® is used as SCF's financial management system. It is a comprehensive platform used to ensure accurate tracking, reporting and allocation of Perkins funds. Banner® allows for streamlined processing and oversight, as all expenditures and allocations are directly linked to Perkins program and grant objectives within the system. The system also manages deliverables, invoices and payments associated with any contractual agreements entered utilizing federal grant funds.
  - SCF uses the Florida College System accounting manual as a uniform and systematic guide for all accounting and fiscal measures of their federal grant awards.
  - The following components of the policies and procedures manual were reviewed as part of the monitoring process:
    - Purchasing guidelines and procedures
    - Sole source purchases
    - Budget implementation

- Cash management
- Contracts and bids
- Purchasing cards (P-card)
- Inventory management
- Procurement
- Conflict of interests
- Ethics
- Travel
- The monitoring team lead conducted a Grant Budget Analysis to compare SCF's approved budget versus their final expenditure reports that are submitted to the Department Comptroller's office. Upon review, it was determined that all expenditures were in accordance with their approved budget narratives and any subsequent amendments.
- Grant administrators routinely review their grant budgets to keep track of current expenditures and to ensure that there is no cost overrun between object codes. If the scope of a project changes or if funds need to be re-allocated, an amendment will be drafted and submitted to the Division.
- SCF does use grant-funded P-cards for minor expenditures. All purchases made with P-cards must receive prior approval and be used solely for the operation of a grant-funded program or when encumbering expenses necessary for tasks such as travel and conferences. When a P-card is used, it is the responsibility of the authorized card holder to submit proper documentation to the Business Office for reconciliation toward the appropriate grant fund. Sample P-card transactions and reconciliations were provided by SCF.
- SCF does use grant dollars to fund travel for student and administrators to attend conferences, training, etc. All pre-approved travel is submitted to designated administrators, and no travel takes place unless fully authorized and approved. All travelers are reimbursed (mileage, meals, per diem, etc.) in accordance with applicable federal and state law.
- All supplies, equipment and services charged to a grant-funded source shall be purchased using sound judgement and obtained at the lowest cost possible. Expenditures must go toward the operation of programs and fit within the scope of the grant. No purchases shall be authorized without prior approval from the Division via a grant award letter and/or subsequent amendment(s).
- Once a service or equipment need is determined, the department head will begin the procurement process by obtaining quotes from various vendors. Upon review of the contract or quote, a purchase requisition is created and submitted to the purchasing department for review and approval. When approved, a purchase order is prepared and sent to the vendor to fulfill the order. When equipment is received or a service is completed, the accounts payable department will then process payment to the vendor and/or contractor.
- The dollar value of a purchase ultimately dictates the procurement method used to acquire goods and/or services. A bid is required for each purchase over Category (3) Three (\$65,000), per section 287.01, Florida Statute, except as otherwise provided in applicable Florida law and regulations. Requisition thresholds are as follows:
  - Micro-purchase – \$0-\$10,000
  - Small Purchase Procedure – \$10,001-\$250,000
  - Sealed Bid – \$250,001 and up
  - Competitive Proposal \$250,001 and up
  - Noncompetitive Proposal (Sole Source) – \$10,000 and up

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

- SCF has numerous collaborations, partnerships and MOUs throughout their service region. These partnerships aid in the expansion and implementation of the core objectives of SCF. The list of partners includes, but is not limited to:
  - CareerSource Suncoast
  - School District of Manatee County
  - Sarasota County Schools
  - Manatee Technical College
  - Advanced Orthopedic Center of Charlotte County
  - Veterans Affairs – Bay Pines
  - Coastal Orthopedics

## **VIII.    RESULTS**

SCF was not found to be out of compliance.

## **IX.      SUMMARY**

After completing the monitoring review and receiving any additional information requested, a preliminary report is sent to the provider for their review. The Division monitoring team lead may consider comments at their discretion. Once the final report is approved, it will be sent to the agency head and a copy will be sent to the provider's designated contact person. The final report will also be posted on the Department's website, which can be found at:

<http://fldoe.org/academics/career-adult-edu/compliance>.

Once all outstanding corrective action plan items have been completed (when applicable), the Division will issue a closure letter to the agency head and designated contact person. This letter will signify the end of the monitoring process and that no further action is required.

On behalf of the Division, the monitoring team would like to extend their appreciation to all participants in the State College of Florida, Manatee-Sarasota monitoring review. A special thanks is offered to Ms. Erin Buckley for her participation and leadership during this process.

## **APPENDIX A**

State College of Florida, Manatee-Sarasota  
Career and Technical Education  
Risk Matrix

| Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE)<br>Carl D. Perkins Grants |                 |             |                 |        |                     |
|---|-----------------|-------------|-----------------|--------|---------------------|
| Agency Name: State College of Florida, Manatee-Sarasota<br>Program Type: CTE<br>Monitoring Year: 2024-25  |                 |             |                 |        |                     |
| Metric  | Scaling         | Point Value | Points Assigned | Weight | Total Metric Points |
| Number of Years Since Last Monitored  | 7 or More Years | 7           | 3               | X 10   | 30                  |
|   | 5-6             | 5           |                 |        |                     |
|   | 3-4             | 3           |                 |        |                     |
|   | 0-2             | 1           |                 |        |                     |
| Total Budget for all Perkins Grants Combined  | Upper Quartile  | 7           | 3               | X8     | 24                  |
|   | Upper Middle    | 5           |                 |        |                     |
|   | Lower Middle    | 3           |                 |        |                     |
|   | Lower Quartile  | 1           |                 |        |                     |
| Number of Perkins Grants  | 4 or More       | 7           | 1               | X 8    | 8                   |
|   | 3               | 5           |                 |        |                     |
|   | 2               | 3           |                 |        |                     |
|   | 1               | 1           |                 |        |                     |
| Change in Management Information Systems (MIS) from Previous Fiscal Year                                  | Yes             | 7           | 0               | X 6    | 0                   |
|   | No              | 0           |                 |        |                     |
| Change in program Director  | Yes             | 7           | 7               | X 6    | 42                  |
|   | No              | 0           |                 |        |                     |
| Unexpended Funds from all Perkins Grants Combined   | Upper Quartile  | 7           | 3               | X 4    | 12                  |
|   | Upper Middle    | 5           |                 |        |                     |
|   | Lower Middle    | 3           |                 |        |                     |
|   | Lower Quartile  | 1           |                 |        |                     |
|   | 0               | 0           |                 |        |                     |
| Number of Findings from the Office of the Auditor General   | Upper Quartile  | 7           | 3               | X 4    | 12                  |
|   | Upper Middle    | 5           |                 |        |                     |
|   | Lower Middle    | 3           |                 |        |                     |
|   | Lower Quartile  | 1           |                 |        |                     |
|   | 0               | 0           |                 |        |                     |
| AGENCY RISK SCORE:  |                 |             |                 |        | 128                 |

Data sources used for calculations: Prior to July 1, 2023



**Please address inquiries regarding this report to:**

**Kara Kearce**  
**Director of Quality Assurance and Compliance**  
**[Kara.Kearce@fldoe.org](mailto:Kara.Kearce@fldoe.org)**  
**850-245-9033**

**Florida Department of Education**  
**Division of Career, Technical and Adult Education**  
**325 West Gaines Street · Room 722A**  
**Tallahassee, Florida 32399**

