

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

Northwest Florida State College

November 18-20, 2024

Final Report

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Florida Department of Education Division of Career and Adult Education

Northwest Florida State College 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 21st 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 Northwest Florida State College (NWFSC) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Dr. Kristi Kedroski, President*, on August 16, 2024. The designated representative for the agency was Dr. Christopher Gabers, Interim Dean, Workforce Education.

*President Mel Ponder joined NWFSC on January 2, 2025, as the new President of the college.

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

V. NORTHWEST FLORIDA STATE COLLEGE

Finance

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

FY 2021-22			
Grants	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins Rural	462-1612B-2CR01	\$ 39,761.00	\$ 100.60
Perkins Postsecondary	462-1612B-2CP01	\$ 259,0613.00	\$ 53,950.44
FY 2022-23			
Grants	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins Rural	462-1613B-3CR01	\$ 39,533.00	\$ 39,533.00
Perkins Postsecondary	462-1613B-3CP01	\$ 245,748.00	\$ 51,814.22
FY 2023-24			
Grants	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins Rural	462-1614R-4CR01	\$ 40,216.00	\$ 2,661.01
Perkins Postsecondary	462-1614B-4CP01	\$ 190,408.00	\$ 5,542.21

Additional information about the provider may be found at the following web address: https://www.nwfsc.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:

- NWFSC Fort Walton Beach Campus
- NWFSC Niceville Campus

Entrance and Exit Conferences

The entrance conference for NWFSC was conducted on November 18, 2024. The exit conference was conducted on November 19, 2024. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Christopher Gabers	Interim Dean, Workforce Education, NWFSC	X	X
Belinda Wise	Associate Director, Career Education, NWFSC	Х	
Division Monitoring Team			
Michael Swift	Program Specialist, QAC	Х	Х
Chuck Davis	Program Specialist, QAC	Х	Х

Interviews

The monitoring team lead conducted a fiscal review of the providers' grant budget analysis (GBA). Numerous line items within the GBA resulted in a finding (see Section VIII). The QAC team had a meeting with the Interim Dean of Workforce Education and the college accountant to discuss the finding and what ultimately lead to it.

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. <u>ADMINISTRATION</u> refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.
 - The NWFSC CTE grants and programs are managed by administrators with numerous years of experience within their respective program areas. The Associate Director of Career Education and interim Dean of Workforce Education work directly with administrators and faculty to determine the needs of each program area to be included in their grant applications. Additionally, the Associate Director of Career Education is responsible for the adherence to the terms and conditions of each federal award.
 - The Division grant manager for NWFSC reported that grant applications and amendments are routinely submitted on time and typically require little to no additional guidance. If revisions are needed, the Associate Director of Career Education submits those in a prompt manner.
 - As part of their 2023-24 comprehensive local needs assessment (CLNA), NWFSC 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. The list of stakeholders includes, but is not limited to:
 - CareerSource Okaloosa Walton Representatives of local workforce board
 - Okaloosa and Walton County school districts Local secondary educational agency representatives

- NWFSC and Emerald Coast Technical College (ECTC) faculty and staff and Okaloosa Technical College (OTC) – Postsecondary representatives
- NWFSC Accommodation Resource Center Special populations and individuals with disabilities
- Local business owners (private and public)
- Economic Development Council for Okaloosa and Walton counties
- Workforce Advisory meetings are held throughout the school year with the above-mentioned stakeholders, as well as other participants who represent multiple entities within the region.
- NWFSC also hosts monthly meetings in which updates are provided from approximately 54 industry partners. These monthly meetings give companies and/or organizations the opportunity to give presentations and allow members to see and hear the local needs, challenges and future activities. This allows NWFSC to keep up on current needs and the college provides information about program offerings that support industry trends.
- NWFSC conducts ongoing professional learning and training events to ensure all CTE administrative staff are up to date on any changes that come from the federal and/or state-level Department of Education. Division-sponsored training events are also attended. NWFSC provided multiple records of training and learning events.
- **B.** <u>**DATA AND ASSESSMENT**</u> refer to all the data and assessment system components, including test administration, test security, data collection, entry, reporting and procedures. The use of data in program decision-making is also explored and commented on.
 - NWFSC 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.
 - NWFSC has a Data Collections and Reporting manual that outlines the procedures for collecting and reporting industry certification data for both the Career and Professional Education (CAPE) Act and Perkins V reporting requirements. Division policies on the submission of student data are also adhered to and followed.
 - 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®, which includes automated validation rules that double check the data against preassigned scoring values. 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 Associate Director of Career Education is ultimately responsible for the accuracy and validity of CTE student data submitted to the Department. This individual reports directly to the interim Dean of Workforce Education. A job description for the position listed above was provided by the college.
 - NWFSC 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.
 - Notification for use of photos

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

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 NWFSC. Records reviewed included:
 - CTE postsecondary industry certifications
 - Postsecondary Adult Vocational program completers

Upon review of the postsecondary industry certifications provided, it was discovered that two students who were reported as having earned a certificate did not actually earn the credentials. This did result in a finding (see Results section), as well as potential repayment of any CAPE funding that was paid to the college. The finding will be reported to the Division Career and Professional Education (CAPE) office to determine any monetary penalties.

- C. <u>CURRICULUM AND INSTRUCTION</u> refer to those elements that contribute to student learning and skill acquisition.
 - NWFSC offers CTE programs on all campuses and multiple satellite centers within the region. NWFSC campuses also serve secondary Dual Enrollment (DE) students, and multiple high school campuses have a dedicated NWFSC Virtual Classroom that provides a designated workspace for DE students to access their online college coursework. In some instances, online-live courses may be offered
 - NWFSC has a memorandum of understanding (MOU) with CareerSource Okaloosa Walton 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 NWFSC service region, including the Eglin Education Center located on Eglin Air Force base.
 - 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
 - o Labor Market insights
 - Skills assessments and workshops
 - Scholarships and training programs
 - Support specifically designed for military members and families
 - NWFSC offers students multiple opportunities to participate in additional learning activities outside of the traditional classroom environment, including career exploration and career development activities.
 - Students in the Medical Laboratory Technology program participate in internships with partner medical facilities and partake in "lunch and learn" forums to hear about job placement options for graduating students.
 - Physical Therapist Assistant students gain diverse clinical experiences by working in multiple areas of practice, including rotations with inpatient and outpatient settings.
 - Most CTE programs offer corresponding clubs and/or career and technical student organizations.
 - All students have the opportunity to meet with a Student Success Navigator (Navigator) at any point while enrolled. When a new student meets with a Navigator, the Navigator provides the student with admission requirements, deadlines, etc. Students can make appointments for in-person meetings, walk-in or call to speak to a Navigator on the phone.
 - All Navigators are trained in CTE offerings, and program directors provide related updates and training throughout the year.

- In an effort to continually attract non-traditional and special population students, NWFSC Recruitment Coordinators present at local high schools and educational fairs, including career fairs and open house events.
- In compliance with the Americans with Disabilities Act 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 Accommodation Resource Center at NWFSC helps students with disabilities by limiting educational barriers within the scope of each student's needs and available resources.
- NWFSC 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
- NWFSC 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.** <u>**TECHNOLOGY AND EQUIPMENT**</u> refers to a review of the technology and equipment used by students and instructors in the classroom; addresses access, availability, innovation, use and condition.
 - All inventory criteria set forth by federal, state and local guidelines are included within the district's fixed asset management system.
 - NWFSC 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, NWFSC has internal controls and procedures to govern loss prevention, transfer of property and the surplus of capital equipment.
 - Department heads are responsible for ensuring compliance with all inventory requirements, and the college property manager is responsible for maintaining an updated master inventory of all records.
 - All capitalized equipment and inventory over \$5,000 is tracked via the college's inventory management system, and items under that threshold are the responsibility of each department within the college. Information Technology (IT) equipment is tracked separately by the IT department.
 - Monitoring staff conducted inventory reviews at multiple NWFSC 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 equipment is inventoried at least annually, and all inventoried property must match the records maintained within the inventory management system.
 - NWFSC reported no instances of lost, damaged or stolen granted-funded capital assets over the past 36 months.
 - NWFSC virtual high school classrooms are equipped by the college, and all assets belong to the college. While housed at each high school, it is the responsibility of the local property custodian to ensure equipment maintenance and enact safeguards for all items.

- E. <u>EQUAL ACCESS</u> refers to compliance with federal non-discrimination laws' requirements relating to recruitment, enrollment, participation and completion of programs.
 - NWFSC 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. <u>RECORDS REVIEW</u> refers to reviewing the records and documents that evidence compliance with federal and state rules and regulations. In addition, a sampling of financial and programmatic records is reviewed.

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. <u>FINANCIAL</u> refers to aspects of the federal fiscal requirements that providers must meet when expending federal funds, including financial management, procurement, inventory management and allowable costs.
 - Banner® is used as NWFSC'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.
 - NWFSC uses the Florida College System accounting manual as a uniform and systematic guide for all accounting and fiscal measures of their federal grant award.
 - 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
- o Travel
- The monitoring team lead conducted a Grant Budget Analysis (GBA) to compare NWFSC's approved budget versus their final expenditure reports that are submitted to the Department Comptroller's office. Upon review, it was discovered that multiple object codes included in their final expenditure reports were both overspent and previously unapproved. This did result in a finding (see Results section). As a result, the monitoring team lead conducted a meeting to discuss the finding and what led to it. During the meeting, the NWFSC Interim Dean and Accountant acknowledged the issues and stated that steps had already been put in place to prevent a recurrence of the finding. While both are new to their positions, this was a problem that was caught early into their tenures and they are working with their staff toward improved fiscal reporting and budget management.
- The Interim Dean and Accountant for Workforce Education 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.
- NWFSC does not use grant-funded purchasing cards for grant related expenditures. All purchases utilizing Perkins funds are processed directly through the college's financial management system to ensure compliance and accurate tracking. Additionally, by using a more centralized purchasing process, NWFSC is able to enhance financial oversight and reporting, thus ensuring all Perkins-related purchases meet grant requirements and college policies.
- NWFSC uses grant dollars to fund travel for student and administrators to attend conferences, training, etc. All pre-approved travel is submitted in RaiderNet, 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.
 - Less than \$15,000 Requires one quote from a list of pre-registered vendors or a new vendor. New vendors must be approved by the purchasing department.
 - \$15,000 but less than \$35,000 Requires two quotes and unless justified, the lowest of the two shall be used.
 - \circ \$35,000 but less than \$65,000 Requires three quotes, with the lowest being used for the purchase.

- Over \$65,000 Shall be managed by the Director of Purchasing and require a formal invitation bidding process and Board of Trustees approval, if over \$325,000.
 Policies on sole source and single source purchases are also included in the college purchasing manual.
- When entering into a grant-funded contractual agreement, no employee shall sign said contract unless designated the authority by the Vice President of Business Operations and Chief Financial Officer to do so.
- **H.** <u>COLLABORATION</u> refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.
- NWFSC has numerous collaborations, partnerships and MOUs throughout their service region. These partnerships aid in the expansion and implementation of the core objectives of NWFSC. The list of partners includes, but is not limited to:
 - CareerSource Okaloosa Walton
 - Embry-Riddle Aeronautical University
 - o Florida Agricultural and Mechanical University
 - The University of West Florida
 - Okaloosa Technical College
 - Walton County School District
 - The Seaside School, Incorporated
 - Santa Rosa County School District
 - Rocky Bayou Christian School
 - School Board of Okaloosa County
 - Holmes County School District
 - Crane Aerospace
 - Crestview Aerospace
 - Fort Walton Machining
 - Multiple city and county Chambers of Commerce
 - Walton County Sheriff's Office
 - Gordon Air conditioning
 - Okaloosa County Corrections

VIII. RESULTS

NWFSC was found to be out of compliance in the following areas:

Finding Number	1			
Area	Finance			
Finding Summary	The monitoring team lead conducted GBAs for all grants from 2021-			
	2024. The GBA uncovered multiple instances of over-expending and			
	charging grant funds to unapproved object codes.			
Finding Detail	Project 462-1614P-4CP01			
	• Object code 65501 – overspent by \$12,663.66			
	• Object code 70506 – unapproved and expended \$8,787.23			
	• Object code 70601 – an amendment was submitted to remove			
	funds for the object code, but still expended \$8,456.50			

	Project 462-1613B-3CP01			
	• Object code 54000 – unapproved and expended \$7,822.50			
	• Object code 70601 – overspent by \$24,287.99			
Citation	Violation of the Project Application and Amendment Procedures for			
	Federal and State Programs (Green Book), Section B "Project			
	Amendments. Along with <u>2 CFR 200.308, (b) (c)</u> Revisions of the			
	budget & program plan, and <u>2 CFR 200.407</u> , not seeking prior			
	approval before expending funds.			
Recommended/Anticipated	The NWFSC Interim Dean and Accountant acknowledged the issues			
Corrective Action	and stated that steps had already been put in place to prevent a			
	recurrence of the finding. While both are new to their positions and the			
	budgets were prepared prior to their existing roles, this was a problem			
	that was caught early in their tenures, and they are working with their			
	staff towards improved fiscal reporting and budget management.			
	A letter of attestation describing the steps being taken to prevent future			
	budgetary issues shall be drafted, signed and submitted to the			
	monitoring team lead.			
Anticipated completion	N/A			
date:				
Name and Title responsible	Dr. Christopher Gables, Interim Dean, Workforce Education			
for CAP				
Plan Accepted by:	Michael Swift			
Status of Action Plan	Closed			

Finding Number	2
Area	Data and Assessment
Finding Summary	Upon review of the postsecondary industry certifications provided, it was discovered that two students who were reported as having earned a certificate did not actually earn the credentials. The finding will be reported to the Division CAPE office to determine any monetary penalties.
Finding Detail	2022-23 Industry Certifications reported in error: Law Enforcement Officer Certified Hospitality Supervisor
Citation	Violation of UGG 2 CFR 200.313; UGG 2 CFR 200.313(c); UGG 2 CFR 200.303(d)(3)
Recommended/Anticipated	Due to the nature of the finding, it will be handed off to the Division's
Corrective Action	CAPE office for determination of possible monetary penalties. No
	further action is required by the QAC team. Future correspondence will be handled by the CAPE office, if necessary.
Anticipated completion	N/A
date:	
Name and Title responsible	N/A
for CAP	
Plan Accepted by:	N/A
Status of Action Plan	Closed

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 you can find 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 Northwest Florida State College monitoring review. A special thanks is offered to Ms. Belinda Wise and Dr. Chris Gabers for their participation and leadership during this process.

APPENDIX A

Northwest Florida State College Career and Technical Education Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants

Agency Name: Northwest Florida State College Program Type: CTE Monitoring Year: 2023-2024

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7			
	5-6	5	3	V 10	30
	3-4	3	3	<u>X 10</u>	50
	0-2	1			
	Upper Quartile	7			
Total Budget for all Perkins	Upper Middle	5		370	0
Grants Combined	Lower Middle	3	1	<u>X8</u>	8
	Lower Quartile	1			
	4 or More	7			
Number of Perkins Grants	3	5	_	VO	40
Number of Perkins Grants	2	3	5	<u>X 8</u>	40
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	- 0	X 6	0
	No	0	U	<u> </u>	U
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	7	¥ 6	42
	No	0	1	<u>X 6</u>	42
	Upper Quartile	7			
Unexpended Funds from all	Upper Middle	5			
Perkins Grants Combined	Lower Middle	3	7	<u>X 4</u>	28
Terkins Grants Combined	Lower Quartile	1	-		
	0	0			
	Upper Quartile	7			
Number of Findings from the	Upper Middle	5			
Office of the Auditor General	Lower Middle	3	7	<u>X 4</u>	28
Once of the Auditor General	Lower Quartile	1			
	0	0			
			AGENCY RISK	SCORE:	176

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 850-245-9033

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