

# **Quality Assurance and Compliance**

# Onsite Monitoring Review for Pathways to Career Opportunities Grant

Hillsborough County Public Schools

October 14-16, 2024

Final Report

## TABLE OF CONTENTS

I.	Introduction	. 1
II.	Authority	. 1
III.	QAC Core Monitoring Guide	. 1
IV.	Provider Selection	. 1
V.	Hillsborough County Public Schools	. 2
VI.	Monitoring Activities	. 2
VII.	Observation	. 2
VIII.	Results	. 6
IX.	Summary	. 7

Florida Department of Education Division of Career and Adult Education

#### Hillsborough County Public Schools Pathways to Career Opportunities Grant (PCOG) 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

Pursuant to Section 1008.32, Florida Statutes, Rule 6A-20.046, Florida Administrative Code, the PCOG Request for Proposal and the Uniform Grant Guidance, also referred to as 2 Code of Federal Regulations Part 200, the Department is responsible for monitoring programs run by a sub-grantee or provider of supported activities to ensure adherence to relevant federal and state regulations.

## 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: <a href="http://fldoe.org/academics/career-adult-edu/compliance">http://fldoe.org/academics/career-adult-edu/compliance</a>.

## IV. PROVIDER SELECTION

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 Hillsborough County Public Schools (HCPS) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Mr. Van Ayers, Superintendent, August 16, 2024. The designated representative for the agency was Mr. Chris Jargo, Coordinator, Career and Technical Education.

# V. HILLSBOROUGH COUNTY PUBLIC SCHOOLS

#### **Finance**

The provider was awarded the following grant(s) for the fiscal years (FY) 2019-20, 2020-21 and 2022-23:

FY 2019-20				
<u>Grants</u>	Grant Number	Grant Amount	Un	<u>expended</u>
Pathways to Career	290-90310-0D001	\$ 625,580.00	\$	.00
Opportunities	290-90310-0D002	\$ 94,727.00	\$	.00
FY 2019-20 Pathways to Career Opportunities	290-90310-1D301	\$ 92,611.00	\$	.00
FY 2019-20 Pathways to Career Opportunities	290-90310-38501	\$ 504,279.00	\$	6,286.68

Additional information about the provider may be found at the following web address: <u>https://www.hillsboroughschools.org/</u>

## VI. MONITORING ACTIVITIES

The monitoring activities include pre- and post-review planning, an entrance and exit conference, records review and interviews with administrators, if necessary.

#### Onsite Visits

- Tampa Bay Technical High School
- Lennard High School
- Durant High School
- Plant City High School

#### Entrance and Exit Conferences

The entrance conference for HCPS was conducted on October 14, 2024. The exit conference was conducted on January 15, 2025. The participants are listed below:

Name	Title	Entrance	Exit	
		Conference	Conference	
Chris Jargo	Coordinator, CTE, HCPS	Х	Х	
<b>Division Monitoring</b>				
Team				
Michael Swift	Program Specialist, QAC	Х	Х	
Chuck Davis	Program Specialist, QAC	Х	Х	

#### 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 CTE director is responsible for management of the district's PCOG grants. He possesses years of experience within Workforce Education.
  - Programmatic staff and PCOG Advisory Boards assist with determining the needs and use of the PCOG funds. Those individuals also provide ongoing consultation in support of the program and executing the requirements of the grant.
  - Deliverables are submitted to the Division on time, and grant amendments are submitted with minimal errors.
- **B.** <u>**DATA AND ASSESSMENT**</u> refers 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.
  - The Division's Data, Research and Evaluation team requested that the monitoring staff confirm HCPS's PCOG enrollment numbers submitted to the state reporting database. Enrollment data was requested for the following occupations:
    - Ironworker
    - Carpentry
    - Pipefitter
    - Electrician
    - Millwrights
  - Upon review of the student data, it was determined that the district failed to accurately report student enrollment data. Finding 1
- C. <u>CURRICULUM AND INSTRUCTION</u> refers to elements contributing to student learning and skill acquisition.
  - HCPS is the local education agency (LEA) and grant applicant who provides related technical instruction (RTI) to students in the preapprenticeship program using the MC3 curriculum.
  - HCPS offers facilities specifically at four school sites including Durant High School, Lennard High School, Plant City High School and Newsome High School.
  - HCPS also helped recruit students to join the preapprentiship program and the Millwrights apprenticeship program as a way to help students move toward graduation and a promising, in-demand career path.
  - The qualifications for the high school preapprenticeship program are that students must be at least 16 years of age (if the participant is a minor they must have written parental or guardian consent to participate in the program) and they must be registered in a registered preapprenticeship program.
  - Instructors, who are a part of HCPS and provide the preapprenticeship instruction, must be certified through the state of Florida to teach Technical Agriculture Operations, they must have six or more years of experience in the field for the profession, and they must attend the professional learning training on the MC3 curriculum.

- **D.** <u>**TECHNOLOGY AND EQUIPMENT**</u> refer 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.
  - HCPS has policies and procedures on property management, equipment safety/storage, inventory reconciliation and inventory disposal. In addition to these policies and procedures, HCPS has internal controls and procedures to govern loss prevention, transfer of property and the surplus of capital equipment. Property control records are housed within the Property Office (PO).
  - a) Upon notification of a purchase of an item that qualifies for a tag the Property Control Department issues the appropriate gray or yellow tag(s). The tag(s) are attached to the screen print of the purchase order and forwarded to the appropriate site. Upon receipt of the item, the tag(s) are affixed in a visible and scannable location (upper left front is suggested). The tag number and initials "HCPS" must be engraved on the item. b) If the tag(s) are not received within three weeks of the date of the requisition, the site immediately notifies the Property Control Department. c) When placing the tag on the property, the site records the serial number, room, model, manufacturer and department information into the Lawson asset record.
  - Capitalized equipment is inventoried at least annually, and all inventoried property must match the records maintained within the PO. Property Managers must notify the office of any property that is lost, believed to be stolen or missing.
  - Any instances of theft, burglary or damage to equipment must be reported in a Damage and/or Loss of Property Report and submitted electronically to the PO within 72 hours of discovering the loss. A police report with the case number must also be attached to the report. The report will be submitted to the Board, who will then approve the item(s) for deletion from inventory.
  - HCPS reported no instances of lost, damaged or stolen granted-funded capital assets over the past 36 months.
  - Monitoring staff conducted inventory reviews at twelve HCPS campuses and all inventory was accounted for and in its correct location. The district capitalized inventory monetary threshold is \$1,000. QAC staff verified inventory at the federal \$5,000 threshold, as well as spot checked \$1,000 items for internal controls compliance. No issues were uncovered.
  - Annual training is provided to all district Property Managers to learn the duties, responsibilities and inventory reports required of their position.
- E. <u>RECORDS REVIEW</u> refers to reviewing the records and documents supporting compliance with federal and state rules and regulations. In addition, a sampling of financial and programmatic records is reviewed.

## **Documents reviewed were:**

- District policies and procedures for finance, procurement, accounts payable, etc.
- District policies and procedures for property accounting and management
- Memorandum of Understanding (MOU) with CareerSource Tampa Bay
- Final Project Disbursement Report
- PCOG performance outcome forms
- Apprenticeship activity reports
- Procurement records

- F. <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.
  - Infor Financials and Supply Management System® is used as HCPS's financial management system. Purchases, contracts, deliverables and all aspects of procurement are housed within the Infor cloud platform.
  - HCPS has policies and procedures that provide a uniform and systematic method for procurements in an efficient, cost-effective manner in accordance with, and as permitted by, applicable federal and state laws; Department rules; School Board policies; and administrative rules, procedures and guidelines which promote transparency and accountability in the expenditure of federal and state funds The following components of the 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
  - Project managers 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.
  - HCPS does use grant-funded P-cards for minor expenditures. All purchases made with Pcards 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 HCPS.
  - 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).
  - HCPS provided additional fiscal records such as:
    - $\circ$  Time and effort
    - Procurement
    - o Travel
    - P-card transactions
  - Monitoring staff conducted a budget analysis of HCPS's Department grants.
- G. <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.

- HCPS has numerous collaborations, partnerships and MOUs within the local community. They offer additional educational and job experiences to students within their service area. The list of partners includes, but is not limited to:
  - o National Electrical Contractors Association West Coast Chapter
  - o CareerSource Tampa Bay

# VIII. RESULTS

HCPS was found to be out of compliance. See Finding 1

Finding Number	1
Area	Student Data Reporting
Finding Summary	Student Data was reported incorrectly.
Finding Detail	HCPS incorrectly reported their data to the state
	for electricians and millwrights occupations for
	the 2021-2022, 2022-2023, and 2023-2024
	reporting years.
Citation	Section 1011.80, Florida Statutes
<b>Recommended/Anticipated Corrective Action</b>	The Director of Research and Evaluation, Dr.
	Brittany C. Ross, will implement and monitor the
	Corrective Action Plan (CAP). Once the finding is
	turned over to her staff, the HCPS monitoring
	review will be considered closed. All further
	communication regarding the CAP will be with
	Dr. Ross and her office.
Anticipated completion date:	The CAP will be complete when the provider
	demonstrates a full understanding and compliance
	with state reporting requirements and mandatory
	training.
Name and Title responsible for CAP	Chris Jargo, Coordinator CTE, HCPS
Plan Accepted by:	N/A
Status of Action Plan	N/A

## 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: <a href="https://www.fldoe.org/academics/career-adult-edu/">https://www.fldoe.org/academics/career-adult-edu/</a>

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.

The monitoring team would like to extend their appreciation to all participants in the Hillsborough County Public Schools monitoring review, on behalf of the Division. A special thanks is offered to Mr. Chris Jargo for his participation and leadership during this process. Please address inquiries regarding this report to:

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