



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

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

**Polk County Public Schools**

**September 11 - October 30, 2024**

**Final Report**

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Florida Department of  
Education      Division of  
Career and Adult Education  
  
**Polk County Public Schools**  
**Adult Education and 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 for Career and Technical Education (CTE) under the Carl D. Perkins Strengthening Career and Technical Education 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 CFR 76.770, Education Department General Administrative Regulations and the Uniform Grant Guidance for grant awards issued on or after December 26, 2014. The Division 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 intended to be used broadly by any reviewer conducting an onsite or desk monitoring of any program currently administered by the Division. The guide provides a summary of each facet of the monitoring design and the process. It also contains objectives that may be used as agencies are monitored or reviewed. It is located on the Division's website at <http://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 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 Polk County Public Schools (PCPS) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Frederick Heid, Superintendent, on August 16, 2024. The designated representative for the agency was Ms. Leann Bennett. The Division's representative conducting the OSMR was Program Specialist Charles Davis of the QAC section.

## V. Polk County Public Schools

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

Finance			
FY 2021-22 Grants	Grant Number	Grant Amount	Unexpended
Perkins secondary	530-1612B-2CS01	\$ 1,245,476.00	\$ 15,693.07
Perkins postsecondary	530-1612B-2CP01	\$ 179,501.00	\$ 40,315.35
Perkins rural	530-1612B-2CR01	\$ 25,000.00	\$ 3,219.76
Adult Education-Corrections	530-1612B-2CC01	\$ 100,000.00	\$ 3,524.52
Adult Education-AGE	530-1912B-2CG01	\$ 1,124,766.58	\$ 309,273.42
Adult Education-IELCE	530-1932B-2CE01	\$ 211,201.00	\$ 14,706.52
FY 2022-23			
Grants	Grant Number	Grant Amount	Unexpended
Perkins secondary	530-1613B-3CS01	\$ 1,486,006.00	\$ 74,699.79
Perkins postsecondary	530-1613B-3CP01	\$ 227,715.00	\$ 95,167.89
Perkins rural	530-1613B-3CR01	\$ 25,000.00	\$ 6,573.66
Adult Education-Corrections	530-1613B-3CC01	\$ 100,000.00	\$ 10,477.22
Adult Education-AGE	530-1913B-3CG01	\$ 1,304,358.34	\$ 177,251.46
Adult Education-IELCE	530-1933B-3CE01	\$ 300,201.00	\$ 114,684.16
FY2023-24			
Grants	Grant Number	Grant Amount	Unexpended
Perkins secondary	530-1614B-4CS01	\$ 1,430,838.00	\$ 253,955.92
Perkins postsecondary	530-1614B-4CP01	\$ 211,165.00	\$ 32,590.74
Perkins rural	530-1614B-4CR01	\$ 25,000.00	\$ 136.56
Adult Education-Corrections	530-1614B-4CC01	\$ 88,540.00	\$ 57,885.19
Adult Education-AGE	530-1914C-4CG01	\$ 1,402,816.00	\$ .00
Adult Education-IELCE	530-1934C-4CE01	\$ 232,152.00	\$ 64,729.05

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

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

## 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. Inventory reviews are also conducted when onsite with a provider.

### Onsite Visits

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

- Citrus Ridge
- George W. Jenkins High School
- Lake Gibson Middle School
- Homestead Senior High School
- Polk County Public Schools District Office
- Traviss Technical College

#### Entrance and Exit Conferences

The entrance conference for PCPS was conducted on September 11, 2024. The exit conference was conducted on October 30, 2024. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Leann Bennett	Director, CTE & AE, PCPS	x	x
Ashley White	Senior Grants Coordinator, PCPS	x	x
Hunter Gambrell	Senior Coordinator Workforce Operations, PCPS	x	x
<b>Division Monitoring Team</b>			
Michael Swift	Program Specialist, QAC	x	x
Charles Davis	Program Specialist, QAC	x	x

#### Interviews

No interviews were required as part of the OSMR. PCPS submitted thorough and qualitative documentation and records via the Department ShareFile.

#### Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, section F. A minimum of 60 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.

- As part of the required comprehensive local needs assessment (CLNA), secondary and postsecondary CTE administrative staff consulted with numerous individuals and entities across the Polk County service area. Representatives from student organizations also provided insight into the workforce needs and opportunities for students.
- PCPS works in partnership with Polk Vision. Polk Vision is a community-led partnership of organizations, business, government and individuals acting collectively to ensure implementation of Polk County's community vision.
- The CTE and AE director is closely involved with operations such as financial management and tracking of grant funds, program review and oversight and program relationships with the local community.
- The Senior Grants Coordinator takes the lead on grant application preparation. They work with program area specialists and bring in stakeholders.
- PCPS adopted the records retention schedules published by the Florida Department of State, Division of Library and Information Services, Bureau of

Archives and Records Management, as set forth in publications including but not limited to GS1-SL and GS7 as amended from time to time. The district adheres to the state retention policy of five years.

**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.

- PCPS currently utilizes FOCUS® as their management information system (MIS) and student information system to house and track AE and CTE student data such as records, grades and attendance.
- Policies and procedures on data collection, entry and verification were provided by the district as part of the monitoring process. Policies and procedures were also provided in regard to full-time equivalent survey reports submitted to the Department. The student survey reports are used to ensure the accuracy of data reports submitted to the Department and the reconciliation of error reports they may receive from the Department. PCPS conducts extensive and ongoing training for all individuals who have access to student data. The data specialist attends the state trainings and brings back the information and shares any changes or potential changes with administration and appropriate MIS staff.
- All proctors of the Tests for Adult Basic Education and the Comprehensive Adult Student Assessment System are trained and certified, as required, by the state and the appropriate testing companies. Testing certificates were provided as evidence.
- Students are provided information regarding their rights under the Family Educational Rights and Privacy Act at application and any subsequent change must be in writing and maintained in the student's electronic or paper folder.
- Samples of CTE student data was reviewed and verified for accuracy as part of the OSMR. All student records provided by PCPS were compliant with reported student data. Records reviewed included:
  - Secondary CTE industry certifications
  - Postsecondary CTE industry certifications
  - Postsecondary program completers
  - AE completers
  - AE non-completers

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

- CareerSource Polk (CSP) industry sector managers participate on CTE program advisory boards and work directly with the career education department to participate in decisions related to program offerings, course activities and vendor selection on related items.
- In an effort to "grow their own," school personnel developed a focus on working with students from career and technical programs to position them to enter the field of education. The Workforce Education staff works directly with local colleges and universities to create partnerships and develop direct pathways to teacher certification to include alternative certification as well. Business and industry representatives serving on the district advisory board and on advisory councils throughout the region act as recruiters as openings for new career and technical education teachers occur. Efforts to retain school personnel include a process to develop a system of professional development and teacher assistance to address the needs of teachers transitioning from business to industry. District personnel work with new career and technical education teachers to identify and

address challenges they face as they enter the classroom.

- PCPS has a dual enrollment (articulation) agreement in place with Polk State College (PSC) that offers secondary and postsecondary students the opportunity to earn college credit while working toward their high school diploma.
- Students with disabilities are encouraged to enroll in career education programs and receive appropriate accommodations and/or modifications to ensure equal access and the provision of a free appropriate public education and, to the maximum extent appropriate, in the least restrictive environment. The district puts great effort into recruiting non-traditional students into its CTE programs. Non-traditional students are featured in recruitment materials and encouraged to follow through from programs to specific career opportunities. CTE teachers work with Special Education (SE) teachers and school administration to ensure equal access and work with individual education plan teams to ensure compliance with the Individuals with Disabilities Education Act and Section 504 of the Rehabilitation Act.
- Students also participate in career and technical student organizations which allow them to practice skills learned in the classroom via local, state and national competitions and gain invaluable leadership experience from opportunities to serve as chapter and regional officers.
- The monitoring team ensured appropriate programmatic links between the secondary programs of study submitted to the Department and the corresponding postsecondary program at PSC. Various other district articulation agreements were reviewed and verified for the appropriate secondary to postsecondary linkage.
- In accordance with WIOA, PCPS has an MOU with CSP to provide workforce training, employment assistance and other services for those interested in workforce programs and/or literacy services.
- AE and CTE instructors participate in ongoing training provided by the Department and annual professional learning throughout the district. Instructors also participate in program-specific training and certification programs.

**D. TECHNOLOGY AND EQUIPMENT** 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 capital assets are recorded in the SAP® Fixed Asset System.
- The district's threshold for capitalization is \$5,000.
- PCPS has a policy and procedure regarding new equipment requests, equipment safety/storage and disposal of old inventory.
- Technology and equipment is up to date and is being used specifically for CTE programs. The technology is integrated into the curriculum as required per program.
- Equipment is inventoried annually and capital items over \$1,000 receive a numbered inventory identification tag. The system tracks the required elements set forth by the Department and the Uniform Grant Guidance. An inventory search was conducted. All equipment was located and identified.

**E. EQUAL ACCESS** refers to compliance with federal non-discrimination laws' requirements relating to recruitment, enrollment, participation and completion of programs.

- PCPS included the necessary policies required by the General Education Provision Act 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.

Items reviewed during the OSMR included, but were not limited to:

- District policies and procedures for data collection, verification and reporting
- District policies and procedures for finance and procurement
- District policies and procedures for property management
- CLNA w/supporting documents
- CLNA advisory committee records and stakeholder records
- Inventory records
- Procurement records
- SE manual
- MOUs and articulation agreements
- Advisory committee records – agendas, sign-in sheets, etc.
- District professional learning records – agendas, sign-in sheets, training materials, etc.
- CTE student data review
- AE student data review

**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.

- SAP® is used as the district’s enterprise resource planning and financial management system. It is also used to house contractual bids and track payments for vendors.
- The district’s finance department ensures the efficient management of CTE and AE grant funds. The following components of their financial policies and procedures manual were reviewed:
  - Budget Implementation
  - Cash Management
  - Methods of accounting
  - Fiscal internal controls
  - Records and reporting
  - Inventory Management
  - Procurement
  - Conflict of interests
  - Temporary duty assignment (travel) – PCPS uses state-approved guidelines for travel-related expenditures such as mileage rates, per diem and food allowances.
- The district does use purchasing cards specifically for grant funds.
- PCPS provided additional fiscal records such as time and effort reports, procurement records and travel records. All documents were in accordance with applicable local, state and federal law.
- Monitoring staff conducted a budget analysis of PCPS’s Department grants. See Finding 1.

**H. COLLABORATION** refers to the collaborative agreements, partnerships or MOU that are in place to benefit an agency’s programs and students.

- PCPS has numerous collaborations, partnerships and MOUs within the local community. They offer additional educational and job experiences to students within the district. The list of partners includes, but is not limited to:
  - Polk State College
  - Ridge Technical College
  - Traviss Technical College
  - Central Florida Development Council
  - CareerSource Polk



- Polk Vision

## VIII. RESULTS

PCPS was found to be out of compliance due to the following:

<b>Finding Number</b>	<b>1</b>
<b>Area</b>	Finance
<b>Finding Summary</b>	A grant budget analysis (GBA) was conducted for PCPS for all grants from 2021-2024. There was an error in: Spending funds without an approved amendment and lack of internal controls.
<b>Finding Detail</b>	FY 2021-22 CTE-Secondary Funds were spent prior to receiving approved amendment
<b>Citation</b>	Violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments. Along with <a href="#">2 CFR 200.308, (b) (c)</a> Revisions of the budget & program plan, and <a href="#">2 CFR 200.407</a> , not seeking prior approval before expending funds.
<b>Recommended/Anticipated Corrective Action</b>	The Director will provide an updated Grant Management policy and procedures manual with internal controls to provide guidance for submitting amendments on time, not spending funds without prior approval and reiterating the importance of communicating with the district and grant manager for amendment approval. Submit a redlined version for approval from DCAE.
<b>Anticipated completion date:</b>	12/20/2024
<b>Name and Title responsible for CAP</b>	Leann Bennett, Director CTE & AE, PCPS
<b>Plan Accepted by:</b>	Chuck Davis, QAC
<b>Status of Action Plan</b>	Complete

<b>Finding Number</b>	<b>2</b>
<b>Area</b>	Finance
<b>Finding Summary</b>	A grant budget analysis (GBA) was conducted for PCPS for all grants from 2021-2024. Final expenditures were not reported by the date specified in the RFA/RFP.
<b>Citation</b>	Violation of the Project Application Procedures for Federal and State Programs (Green Book), & requirements of RFA/RFP.
<b>Recommended/Anticipated Corrective Action</b>	The Superintendent will provide a letter of attestation stating there will be a plan in place that will assure that submission of reports will be done in a timely manner and that future late or inaccurate submissions may result in delayed award letters for the next cycle.
<b>Anticipated completion date:</b>	12/18/2024
<b>Name and Title responsible for CAP</b>	Frederick Heid, Superintendent, PCPS
<b>Plan Accepted by:</b>	Chuck Davis, QAC
<b>Status of Action Plan</b>	Complete

## **IX. SUMMARY**

Once the monitoring 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 Department monitoring team lead. Once the final report is approved, it will be forwarded to the agency head with a copy sent to the provider's designated contact person. The final report will be posted on the Department's website at the following address: <http://fldoe.org/academics/career-adult-edu/compliance>.

Finally, the Division issues a closure letter to the agency head and designated contact person. This letter indicates that all outstanding corrective action plan 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 Division the monitoring team extends its appreciation to all participants of the Polk County Public Schools monitoring review. Special thanks are offered to Ms. Leann Bennett for her participation and leadership during this process.

## APPENDIX A

### Polk County Public Schools Career and Technical Education Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: <b>Polk County Public Schools</b> Program Type: <b>CTE</b> Monitoring Year: <b>2023-2024</b>					
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	7	X8	56
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	7	X 8	56
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	7	X 6	42
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	7	X 4	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	7	X 4	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					240

Data sources used for calculations: Prior to July 1, 2022

Polk County Public Schools

Adult Education

Risk Matrix

Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants					
Agency Name: Polk County Public Schools					
Program Type: AE					
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	3	X10	30
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	7	X 8	56
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	5	X 8	40
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Agency AE Program Director Change from Previous Fiscal Year	Yes	7	7	X 6	42
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	7	X 4	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	7	X 4	0
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Adult Education Program Improvement Plan (AEPiP)	Target Not Met on 3 of 3 Indicators	5	3	X 6	18
	Target Not Met on 2 of 3 Indicators	3			
	Target Not Met on 1 of 3 Indicators	1			
	All targets met	0			
Agency Risk Score					242

Data sources used for calculations: Prior to July 1, 2022



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

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