

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

School District of Manatee County

May 5-7, 2025

Final Report

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#### Florida Department of Education Division of Career and Adult Education

## School District of Manatee County Perkins Career and Technical Education and Adult 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 is located 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

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 School District of Manatee County (SDMC) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Dr. Jason Wysong, Superintendent, on December 12, 2024. The designated representative for the agency was Dr. Paul Gansemer.

The Division's representative conducting the OSMR was Program Specialist Charles Davis of the QAC.

#### V. SCHOOL DISTRICT OF MANATEE COUNTY

#### **Finance**

The provider was awarded the following grants for the fiscal years (FY) 2021-22 to 2023-24:

F	Y	2021-22

Grants Perkins Secondary	<u>Grant Number</u> 410-1612B-2CS01	Grant Amount \$ 616,080.00	<u>Unexpended</u> \$ 52,386.00
Perkins Postsecondary	410-1612B-2CP01	\$ 294,726.00	\$ 35,130.45
Adult Education – Integrated English Literacy and Civics Education (IELCE)	410-1932B-2CE01	\$ 124,193.00	\$ 1,100.73
Adult Education-General	410-1912B-2CG01	\$ 603,328.00	\$ 1,709.64
FY 2022-23 Grants Perkins Secondary	Grant Number 410-1613B-3CS01	Grant Amount \$ 555,796.00	<u>Unexpended</u> \$ 24,156.84
Perkins Postsecondary	410-1613B-3CP01	\$ 261,265.00	\$ 16,864.40
Adult Education – Integrated English Literacy and Civics Education (IELCE)	410-1933B-3CE01	\$ 182,693.00	\$ .00
Adult Education-General	410-1913C-3CG01	\$ 487,893.00	\$ 18.88

Perkins Equipment Upgrade and Modernization	410-1613R-3C001	\$ 61,331.00	\$	862.41
FY 2023-24 Grants Adult Education-General	<u>Grant Number</u> 410-1914C-4CG01	<u>Grant Amount</u> \$ 617,662.00	<u>Ur</u> \$	nexpended 298.41
Adult Education – Integrated English Literacy and Civics Education (IELCE)	410-1934B-4CE01	\$ 95,206.00	\$	11.24
Perkins Secondary	410-1614S-4CS01	\$ 512,858.00	\$	12,857.15
Perkins Postsecondary	410-1914P-4CP01	\$ 264,256.00	\$	11,658.00
Perkins Equipment Upgrade and Modernization	410-1614R-4C001	\$ 170,815.00	\$	61.27

Additional information about the provider may be found at the following web address: <a href="https://www.manateeschools.net/">https://www.manateeschools.net/</a>.

#### 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

An onsite meeting and review took place at the following location:

- Lee Middle School
- Manatee Technical College (MTC)
- Palmetto High School
- Southeast High School
- Sugg Middle School

#### Entrance and Exit Conferences

The entrance conference for SDMC was conducted on May 5, 2025. The exit conference was conducted on May 6, 2025. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Dr. Paul Gansemer	Executive Director for Adult, Career and Technical Education, SDMC	X	X
Doug Wagner	Director, MTC	X	X
Kelli Kennedy	Assistant Director for Adult, Career and Technical Education, SDMC	X	X
Wendy Giron	Accounting Manager, SDMC	X	X
Maura Howl	Supervisor, Communications & Grants Management, MTC	X	X
Veronica Arellano	Finance/Grants Accountant, SDMC	X	X

Vickie Nissen	Accounting Coordinator, MTC	X	X
Gwendolyn Smith- Warzyk	Student Records and Accreditation Coordinator, MTC	X	X
Leonardo Ramirez Gamboa	Fiscal Specialist for Adult, Career and Technical Education, SDMC	X	X
Division Monitoring Team			
Charles Davis	Program Specialist, QAC	X	X
Dantavia Davis	Program Specialist, QAC	X	X
Michael Swift	Program Specialist, QAC	X	X

#### Interviews

No interviews were required as part of the OSMR. SDMC 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, part F. 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.
  - Prior to a grant application being submitted to the Department, CTE and AE grant managers work with the program directors and assistant directors to determine what program needs will be addressed within the grant.
  - The CTE and AE directors meet with the finance and budget director on a monthly basis to track and monitor all expenditures charged to their grants. This helps to ensure that all federal and state requirements of each grant are being met
  - SDMC consulted with many local stakeholders for the creation of their comprehensive local needs assessment (CLNA) included in their Perkins CTE grants. Those stakeholders include: The State College of Florida Manatee-Sarasota; CareerSource Suncoast; Sarasota County; CTE advisory committees; and community leaders representing disadvantaged students. These stakeholders participate in the district's annual re-evaluation of its CLNA.
- **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.
  - SDMC utilizes the Campus Solutions® system as their integrated management information system.
  - SDMC administrators and the Student Records and Accreditation Coordinator participate in Department sponsored training: spring and fall Workforce Education and District Data Advisory Council meetings; Florida Association of Career and Technical Education and the Division quarterly webinars; and other specialized trainings offered by the Division.

- All the data elements required of their local Management Information System (MIS) were included in the system and verified during the desk review.
- Student electronic files include "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA).
- The Campus Solutions® state reporting module detects errors in reporting data through the Workforce Development Information System data verification feature. The state reporting module also detects any missing required data elements. The Student Records and Accreditation Coordinator reviews the data on a daily basis for errors and corrects them.
- Samples of CTE and AE student data were reviewed and verified for accuracy as part of the OSMR. All student records were provided by SDMC.
- Upon review of the student data, it was determined that SDMC was not compliant in the submission of student data. See Finding 1
- C. <u>CURRICULUM AND INSTRUCTION</u> refers to elements contributing to student learning and skill acquisition.
  - SDMC offers CTE (secondary and postsecondary) and AE programs across multiple campuses and school sites throughout Manatee County.
  - CTE classes are introduced to students as early as middle school, and the aim is for these students to matriculate into high school CTE programs and eventually enroll in a postsecondary program.
  - SDMC offers CTE students opportunities to participate in additional learning activities outside of the classroom. Students participate in on-the-job training (OJT) and Career and Technical Student Organizations (CTSOs). Qualified high school CTE students are also able to dual enroll at Manatee Technical College.
  - Exceptional AE students are able to participate in CTE programs. This allows those students to take part in CTE courses while enrolled as an AE student.
  - AE and CTE instructors participate in ongoing trainings provided by the state, as well as annual professional learning through the district. Program specific training is also attended as required.
  - The district works with students with disabilities to ensure their individual needs are being met and no reasonable services or accommodations are denied to those students.
  - The district has a memorandum of understanding (MOU) with CareerSource Suncoast to provide career services and training for students.
- **D.** <u>EQUAL ACCESS</u> refers to compliance with federal non-discrimination laws' requirements relating to recruitment, enrollment, participation and completion of programs.
  - SDMC 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.
- **E.** <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.
  - The district's threshold for capitalization is \$5,000.
  - SDMC 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 \$5,000 receive a numbered inventory identification tag. The system tracks the required elements set forth by the Department and the Uniform Grant Guidance.
- There have been no reports of stolen or lost equipment over the previous three fiscal years.
- **F. RECORDS REVIEW** 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:**

- Size, scope and quality review
- CLNA
- District policies and procedures for finance and procurement
- District technology plan
- Student and employee handbooks
- Inventory records
- Procurement records
- MOUs and articulation agreements
- Advisory committee records agendas, sign in sheets, etc.
- CTE and AE student data review
- **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.
  - The district has financial policies and procedures in place to ensure the efficient management of CTE and AE grant funds.
  - PeopleSoft® is used as the district's Enterprise Resource Planning (ERP) system.
  - Grant managers work closely with the district finance department and local financial specialists to track grant expenditures. Regular meetings are held to determine the current financial standings of each grant. These meetings ensure that grant expenditures are being managed properly. Budget amendments are submitted to the Department if the opportunity arises.
  - The executive director of Career, Adult and Technical Education approves all expenditures charged to a grant unless the purchase price dictates the need for board approval.
  - SDMC has policies and procedures that provide uniform guidance on the fiscal management of their federally funded grant(s). All documentation and records reviewed were in accordance with applicable federal and state laws; Department rules; and administrative rules directly pertaining to each grant. The following components of the procedures manual was reviewed as part of the monitoring process:
    - Internal controls
    - o Purchasing guidelines and procedures
    - o Budget implementation
    - Cash management
    - Contracts and bids
    - Inventory management

- Procurement
- Conflict of interests
- o Ethics
- o Travel
- SDMC provided additional fiscal records such as:
  - Purchase invoices
  - o Time and effort reports
  - o Financial statements
  - Travel records
- Monitoring staff conducted a budget analysis of SDMC's Department grants. Upon review, the following non-compliance finding was discovered:
  - Object codes were overspent with no budget amendments submitted. See Finding 2
- **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.
  - SDMC has numerous collaborations and MOUs within the local community. They often offer additional educational and job experiences to students within the district. The list of partners includes, but is not limited to:
    - CareerSource Suncoast
    - Manatee Technical College
    - o State College of Florida, Manatee-Sarasota

#### VIII. RESULTS

SDMC was found to be out of compliance due to the following.

Finding Number	1			
Area	Student Data Reporting			
Finding Summary	Industry Certifications were reported incorrectly.			
Finding Detail	One student did not earn the DreamWeaver			
	portion of their certification. Two students were			
	reported completing Agriculture Associate,			
	however it was actually Agriculture Systems			
	Associate.			
Citation	Violation of UGG 2 CFR 200.328			
	"Monitoring and reporting program			
	performance."			
Recommended/Anticipated Corrective Action	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 SDMC 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	CAP Dr. Paul Gansemer, Executive Director CTE &			
	AE, SDMC			

Plan Accepted by:	N/A
Status of Action Plan	N/A

Finding Number	2			
Area	Finance			
Finding Summary	A grant budget analysis (GBA) was conducted for			
	HCSD for all grants from 2021-2024. There was an			
	error in: Object codes were overspent with no			
	budget amendments submitted.			
Finding Detail	• FY 2022-23			
	<ul> <li>CTE-Secondary</li> </ul>			
	Object codes were overspent with no budget			
	amendments submitted.			
Citation	Violation of the Project Application and			
	Amendment Procedures for Federal and State			
	Programs (Green Book), Section B "Project			
	Amendments. Along with 2 CFR 200.308, (b) (c)			
	Revisions of the budget & program plan, and $\underline{2}$			
	<u>CFR 200.407</u> , not seeking prior approval before			
	expending funds.			
Recommended/Anticipated Corrective	The executive director will provide a letter of			
Action	attestation and plan of corrective action			
Anticipated completion date:	5/26/2025			
Name and Title responsible for CAP	Dr. Paul Gansemer, Executive Director CTE & AE,			
	SDMC			
Plan Accepted by:	Chuck Davis 6/16/25			

#### 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 is located 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.

On behalf of the Division, the monitoring team would like to extend their appreciation to all participants in the MCSD monitoring review. A special thanks is offered to Dr. Paul Gansemer for his participation during this process.

#### APPENDIX A

#### School District of Manatee County Career and Technical Education Risk Matrix

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

**Agency Name: School District of Manatee County** 

Program Type: CTE

Monitoring Year: 2023-2024

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points		
	7 or More Years	7		<u>X 10</u>	30		
<b>Number of Years Since Last</b>	5-6	5	,				
Monitored	3-4	3	3				
	0-2	1					
	Upper Quartile	7					
<b>Total Budget for all Perkins</b>	Upper Middle	5	1 _	770	<b></b>		
<b>Grants Combined</b>	Lower Middle	3	7	<u>X8</u>	56		
	Lower Quartile	1					
	4 or More	7					
Normhau of Daulius Cuanta	3	5	7	V 0	56		
Number of Perkins Grants	2	3	7	<u>X 8</u>	50		
	1	1					
Change in Management Information Systems (MIS)	Yes	7	0	V.C	0		
from Previous Fiscal Year	No	0	U	<u>X 6</u>	U		
Agency CTE Program Director Change from Previous Fiscal	Yes	7	7	<u>X 6</u>	42		
Year	No	0			42		
	Upper Quartile	7		<u>X 4</u>			
Unexpended Funds from all	Upper Middle	5					
Perkins Grants Combined	Lower Middle	3	5		20		
Terkins Grants Combined	Lower Quartile	1					
	0	0					
	Upper Quartile	7	5 <u>X4</u>	_			
Number of Findings from the	Upper Middle	5					
Office of the Auditor General	Lower Middle	3		<u>X 4</u>	20		
omee of the Auditor General	Lower Quartile	1					
	0	0					
			AGENCY RISK	SCORE:	224		

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

#### School District of Manatee County Adult Education Risk Matrix

#### Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants

Agency Name: School District of Manatee County

Program Type: **AE** 

Monitoring Year: 2023-2024

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7			
Number of Years Since Last Monitored	5-6	5	5	<u>X10</u>	50
	3-4	3	3	<u>X10</u>	30
	0-2	1			
	Upper Quartile	7			56
<b>Total Budget for all Adult</b>	Upper Middle	5	_	37.0	
<b>Education Grants Combined</b>	Lower Middle	3	7	<u>X 8</u>	
	Lower Quartile	1			
	4 or More	7			
<b>Number of Adult Education</b>	3	5	7	v o	56
Grants	2	3	/	<u>X 8</u>	50
	1	1			
Change in Management Information Systems (MIS)	Yes	7	0	<u>X 6</u>	0
from Previous Fiscal Year	No	0	V	<u>A 0</u>	V
Agency AE Program Director Change from Previous Fiscal	Yes	7	7	<u>X 6</u>	42
Year	No	0			
	Upper Quartile	7	5	<u>X 4</u>	20
<b>Unexpended Funds from all</b>	Upper Middle	5			
<b>Adult Education Grants</b>	Lower Middle	3			
Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7		X 4	20
NI k c E' . l' c 4k .	Upper Middle	5			
Number of Findings from the Office of the Auditor General	Lower Middle	3	5		
Office of the Auditor General	Lower Quartile	1	1		
	0	0			
	Target Not Met				
	on 3 of 3	5			
	Indicators				
	Target Not Met				
<b>Adult Education Program</b>	on 2 of 3	3	5 <u>X 6</u>	Υ 6	30
Improvement Plan (AEPIP)	Indicators			<u>A U</u>	30
	Target Not Met				
	on 1 of 3	1			
	Indicators				
	All targets met	0			
			Agency Ri	sk Score	224

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