

Quality Assurance and Compliance

Onsite Monitoring Review for Adult Education

Literacy Alliance of Northeast Florida

February 27, 2025

Final Report

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Florida Department of Education Division of Career and Adult Education

Literacy Alliance of Northeast Florida 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. OAC 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: 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 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 Literacy Alliance of Northeast Florida (LANEFL) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Mr. Marcus Haile, President, on December 12, 2024. The designated representative for the agency was also Mr. Haile.

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

V. LITERACY ALLIANCE OF NORTHEAST FLORIDA

Finance

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

FY 2021-22 Grants Adult Education – Corrections	Grant Number 555-1912B-2PC	Grant Amount \$ 35,509.00	<u>Unexpended</u> \$ 11,658.00
FY 2022-23 Grants Adult Education – Corrections	<u>Grant Number</u> 555-1913C-3PC01	<u>Grant Amount</u> \$ 138,509.00	<u>Unexpended</u> \$ 60,265.67
FY 2023-24 Grants Adult Education – Corrections	<u>Grant Number</u> 555-1914C-4PC01	Grant Amount \$ 265,620.00	<u>Unexpended</u> \$ 172,700.20
Adult Education – Adult General Education (AGE)	555-1914C-4PG01	\$ 531,583.00	\$ 286,654.55
Adult Education – Integrated English Literacy and Civics Education (IELCE)	555-1914C-4CE01	\$ 114,089.00	\$ 65,867.73

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

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:

• Jessie Ball duPont Center – Jacksonville, Florida

Entrance and Exit Conferences

An introductory pre-visit meeting was conducted on December 18, 2025. Email correspondence was shared with LANEFL to inform them of the outcome of their review. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Marcus Haile	President, LANEFL	X	X
Anita Edwards	Chief Operating Officer (COO), LANEFL	X	X
Division Monitoring Team			
Michael Swift	Program Specialist, QAC	X	X
Dantavia Davis	Program Specialist, QAC	X	X

Interviews

No formal interviews were held as part of the monitoring review. However, the QAC team did engage in lengthy and productive discussions surrounding the operation of the LANEFL literacy programs, including the addition of two federal grant awards they are now managing.

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 the 2023-24 program year, LANEFL only provided AE services for individuals within the Jacksonville Sheriff's Office. For the 2023-24 program year, LANEFL was awarded two additional grants: AGE and IELCE.
 - The AE programs offered by LANEFL include a variety of instructional programs designed to help adult learners acquire the foundational literacy skills they need to succeed as workers, family members and engaged citizens. The program areas include English for Speakers of Other Languages, Adult Basic Education, General Education Development Preparation and IELCE. Their mission is to focus on building essential skills such as reading, writing, math and English language proficiency while also preparing adult learners to be better prepared to enter the workforce and/or pursue postsecondary education opportunities.
 - LANEFL has experience helping adult learners become more proficient in English language acquisition, reading and writing. The organization began in 1969 as Learn to Read Jacksonville, then transitioned to LANEFL in 2020.
 - The LANEFL grants are managed by program coordinators with experience with non-profit organizations and within their respective program areas. The President and COO are primarily responsible for ensuring compliance with the specific laws, terms and conditions of the federal award.
 - Their grant manager reported that deliverables are submitted on time, and when technical revisions are required, they respond and make the necessary adjustments. All deliverables were paid in accordance with the values agreed upon in their approved federal award.

- **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.
 - LANEFL utilizes LiteracyPro Systems, Inc. (LACES) as its integrated Management Information System (MIS) and student information system. The MIS meets all Department requirements as defined by the National Reporting System and the Data Dictionary.
 - LANEFL provides students with the following notification(s) regarding the use and dissemination of student data:
 - o Notification of social security number collection, usage and release.
 - o Student authorization for access to educational records.
 - Student and parental rights provided by the Family Educational Rights and Privacy Act (FERPA).

All notifications are provided at the time of enrollment into a program.

- LANEFL has a Program Policy Manual for the collection, verification, analysis and reporting of student data. Division policies on the submission of student data are followed.
- LANEFL also has policies and procedures to ensure that students are pre-tested within the appropriate time frame allowed by law. The program coordination team uses a data dashboard to track performance metrics to highlight students who have begun instructional activity but have not yet completed a pre-test. If a student is approaching 12 hours of instructional activity, they are flagged and immediately scheduled for testing to comply with Department requirements. The same process is utilized to identify students who have met the set number of instructional hours to sit for a post-test.
- LANEFL AE programs follow mandated attendance policies that require a student to be withdrawn from a course after missing a set number of consecutive classes (six). When a student misses their sixth consecutive class they are placed in "On Hold" status and unenrolled from the class. If the student returns to the program within the 30-day grace period, their status is considered enrolled. If the student fails to return within the allotted grace period, their status is considered "Left" and permanently unenrolled in the LACES system. A sample of student attendance records reflecting automatic class drops was provided by LANEFL.
- AE personnel attend Division events such as quarterly webinars and Management Information System Advisory Task Force meetings. Other Community Based Organization (CBO) professional learning events are attended when the opportunity is available. Additionally, samples of local training events were submitted at the time of monitoring.
- All test proctors are certified in accordance with the Division and testing agency.
 Administrator certificates of completion were provided by LANEFL and reviewed as part of the monitoring process.
- Samples of AE student data were reviewed and verified for accuracy as part of the OSMR. All student records were provided by LANEFL. Records reviewed included:
 - o AGE completers and non-completers
- C. <u>CURRICULUM AND INSTRUCTION</u> refers to elements contributing to student learning and skill acquisition.
 - The AGE and IELCE grants have allowed LANEFL to continue their work with CareerSource Northeast Florida and expand AE programs and opportunities outside of the correctional facilities. In addition to providing corrections programs, their focus now includes adult secondary education, English language learners (ELL) and civics education.

- LANEFL now partners with other CBOs and has expanded their service region beyond Duval County, into neighboring St. Johns County and Clay County. The primary partners in those counties include Learn to Read St. Johns and the Clay County public library system. Other partners include the Women's Center of Jacksonville, Catholic Charities, Lutheran Social Services and the Young Men's Christian Association (YMCA).
- The Collective intends to work in partnership and not in conflict with traditional adult education institutions such as school systems and community colleges by providing an independent network of services to focus on enrolling adult learners who lack the resources and support needed for active and consistent enrollment.
- Other partnerships include collaborations with local institutions such as Florida State College at Jacksonville, First Coast Technical College and Clay County Public Schools. The intent of these partnerships is to broaden the feeder system into postsecondary education and workforce training programs. When enrolled with Collective partners, students will have the opportunity to forge a relationship with these institutions in anticipation of completing their instruction with LANEFL and moving onto postsecondary education. Similar partnerships are in place for those LANEFL students who wish to forego postsecondary education and enter the workforce.
- Within Duval County, examples of increased neighborhood access for AE services include partnering with the Jacksonville Housing Authority to offer classes at housing facilities.
- Beginning with the 2024-25 program year LANEFL will adopt a fully functioning Integrated Education and Training (IET) program to help IELCE learners not only attain literacy skills but also transition into postsecondary education and/or receive simultaneous workforce training for gainful employment.
- Students enrolled in IELCE and AGE programs can select from a multitude of IET programs such as the Google Suite Certification, Cyber Citizen certificate and ServSafe.
- In compliance with 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 individual needs. LANEFL staff work closely with students with disabilities to provide testing accommodations, and work together to create an Individual Education Plan (IEP). If necessary, existing documentation will be sought from the student's prior school system. If existing documentation is unavailable, IEP staff will help the student locate medical and/or vocational rehabilitation resources available to evaluate and document accommodations necessary for instruction and test taking. Such accommodations may include:
 - o Accommodations in test time
 - Giving supervised breaks
 - o Providing a sign language interpreter for test administration directions only
 - o Testing in an alternate room
 - Using a colored overlay
 - o Large-print or Braille test booklets and answer sheets
 - Adaptive furniture
 - Allowing extended time
 - o Read aloud accommodations
 - Magnifying equipment
- LANEFL has personnel in place to provide instructional activities for students, such as
 workplace preparation and professional learning to enhance their skills needed to transition
 into the workforce or into postsecondary education. The Workforce Development and IET
 Coordinator hosts monthly workshops that focus on workplace preparation skills. They also
 provide one-on-one assistance for students looking to improve their employability
 qualifications.

- **D.** <u>EQUAL ACCESS</u> refers to compliance with federal non-discrimination laws' requirements relating to recruitment, enrollment, participation and completion of programs.
 - LANEFL 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.
 - Reftab is the inventory management system that houses all inventory records purchased with grant funds.
 - For the years monitored LANEFL did not utilize federal grant funds to purchase equipment that met the capitalized threshold of \$5,000. Additionally, no equipment was purchased that met the internal control threshold of \$1,000, but LANEFL did provide inventory and procurement documentation for laptops (\$848.33 per unit) purchased with grant funds.
 - The aforementioned laptops are available for students and instructors to "check-out" when working onsite at a satellite location. Documentation was provided for those laptops not available at the time of monitoring.
 - LANEFL has policies and procedures on property management and provided internal controls and procedures that govern loss prevention, transfer of property and the surplus of capital equipment. LANEFL provided additional guidance on the following:
 - o Procurement of equipment
 - o Control systems for safeguarding equipment
 - o Maintenance procedures
 - o Proper use of equipment
 - o Disposition
 - Monitoring and compliance
 - The LANEFL Intake Specialist is responsible for all equipment and inventory that is purchased with grant funds. Additionally, the Intake Specialist is responsible for the management and inventory of office computer equipment for use by students, volunteers and staff using an online check-in/check-out system.
 - LANEFL reported no instances of lost, damaged or stolen granted-funded capital assets over the past 36 months.
- **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:

- Policies and procedures for financial accounting
- Policies and procedures for data management
- Policies and procedures for asset management
- Final Project Disbursement Report
- Grant Budget Analysis (GBA)
- Monthly transaction ledger
- Purchase invoices
- Financial statements
- Records retention

- Quarterly deliverables
- **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.
 - QuickBooks® is used as LANEFL's financial management system. Grants, contracts, invoices and payments are housed within QuickBooks®, while deliverables are tracked within the LACES student management system.
 - The LANEFL Grants Coordinator serves as the contract manager for any agreement entered that uses federal grant dollars, including their Division grants. This individual reports directly to the COO and is responsible for compiling and submitting grant invoices, maintaining grant compliance documentation, monitoring grant budgets and compiling financial or outcome reports. A job description for this position was provided by LANEFL as part of the monitoring review.
 - LANEFL does pay for salaried personnel positions with grant funds. Time and effort reports were provided by LANEFL.
 - LANEFL does not use grant-funded purchasing cards for expenditures. Although not used
 with their federal awards, LANEFL did provide policies and procedures for credit card
 management.
 - LANEFL 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
 - Budget implementation
 - Cash management
 - Contracts and bids
 - Inventory management
 - Procurement
 - Conflict of interests
 - o Ethics
 - Travel

All procedural documents were provided by LANEFL.

- Vendors of LANEFLL are selected by price, quality, administrative reasonability and service. Federally funded Small Purchases (\$10,000 to \$250,000) require a price or rate quotation in writing from a minimum of two vendors. All research, cost comparisons and price information, if gathered, is maintained in vendor files.
- LANEFL provided additional fiscal records such as:
 - o Purchase invoices
 - o Time and effort reports
 - Financial statements
 - Travel records

All records were in accordance with applicable local, state and federal law.

• QAC monitoring staff conducted a fiscal review of the providers' GBA. Upon review, no instances of non-compliance were uncovered. Monitoring staff did discuss, with LANEFL, the importance of consistency of object codes/descriptions between their approved budget

narrative and their final expenditure reports that are submitted to the Department Comptroller's Office.

- **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.
 - LANEFL 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 Jacksonville Sheriff's Office
 - Young Men's Christian Association
 - Ability Housing
 - Duval County Public Schools
 - o CareerSource Northeast Florida
 - o Learn to Read St. Johns County
 - Clay County Public Library System
 - o Jacksonville Housing Authority
 - University of Northeast Florida
 - o Florida State College at Jacksonville
 - o The Women's Center of Jacksonville
 - Catholic Charities
 - Lutheran Social Services
 - United Way of Northeast Florida

VIII. RESULTS

LANEFL was not found to be out of compliance.

IX. SUMMARY

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

https://www.fldoe.org/academics/career-adult-edu/.

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 LANEFL monitoring review. A special thanks is offered to Mr. Marcus Haile and Ms. Amita Edwards for their participation during this process.

APPENDIX A

Literacy Alliance of Northeast Florida Adult Education Risk Matrix

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

Agency Name: Literacy Alliance of Northeast Florida

Program Type: **AE**

Monitoring Year: 2024-25

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7			30
	5-6	5	3	<u>X10</u>	
	3-4	3			
	0-2	1			
	Upper Quartile	7			
Total Budget for all Adult	Upper Middle	5	_	<u>X 8</u>	56
Education Grants Combined	Lower Middle	3	7		
	Lower Quartile	1			
	4 or More	7		W.O.	
	3	5			
Number of Adult Education	2	3			
Grants	1	1	1	<u>X 8</u>	8
	No	0			
Agency AE Program Director Change from Previous Fiscal	Yes	7	0	X 6	0
Year	No	0			
	Upper Quartile	7			
	Upper Middle	5			
	Lower Middle	3			
Unexpended Funds from all	Lower Quartile	1			
Adult Education Grants	0	0	7	<u>X 4</u>	28
Combined	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Agency Risk Score					

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

Please address inquiries regarding this report to:

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