

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

Florida Department of Corrections

August 18-22, 2025

Final Report

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Florida Department of Education Division of Career and Adult Education

Florida Department of Corrections 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, providing technical assistance, evaluating projects and 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's Division of Career and Adult Education is required to oversee the performance of subgrantees in enforcing 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: 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 Florida Department of Corrections (FDC) monitoring strategy was determined to be a virtual monitoring review (VDMR). Notification was sent to Mr. Ricky Dixon, Secretary, on August 14, 2025. The representatives designated for the agency were Ms. Diane Head, Workforce Development and Ms. Staci Mortham, Adult Education.

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

V. Florida Department of Corrections

Finance

The provider was awarded the following grants for the fiscal years (FY) 2022-23 to 2024-25:

FY 2022-23

<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins Leadership	708-1623S-3CL01	\$ 1,000,000.00	\$ 41,014.86
Adult Education - Corrections	708-1913C-3CC01	\$ 1,168,595.00	\$ 516,829.38
FY 2023-24			
<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins Leadership	708-1624S-4CL01	\$ 1,000,000.00	\$ 11,672.03
Adult Education - Corrections	708-1914C-4CC01	\$ 933,397.00	\$ 426,019.58
FY 2024-25			
<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins Leadership	708-1625S-5CL01	\$ 1,500,000.00	\$ N/A
Adult Education - Corrections	708-1915B-5CC01	\$ 1,000,000.00	\$ N/A

Additional information about the provider may be found at the following web address: http://www.dc.state.fl.us/development/programs.html.

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

No on-site visits were conducted as part of the VDMR. Photographic evidence was provided for all capitalized inventory.

Entrance and Exit Conferences

The pre-visit conference for FDC was conducted on August 4, 2025. The exit conference was conducted on August 21, 2025. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Jodi Tillman	Deputy Director for Office of Programs & Reentry, FDC	X	X
Diane Head	Bureau Chief for Workforce Education, FDC	X	X
Staci Mortham	Bureau Chief for Education, FDC	X	X
Kaitlin Vickers	CTE Program Administrator, FDC	X	X
Melvin Herring	Assistant Bureau Chief of Education, FDC	X	X
Walker Hicken	Adult Education Administrator, FDC	X	X
April Kalnin	Assistant Bureau Chief of Workforce Development, FDC	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 VDMR. FDC 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.
 - The Bureau of Education within FDC is responsible for overseeing the academic and vocational needs of its inmates. Their AE and CTE programs, along with grant management, fall under this bureau.
 - The FDC CTE and AE grants are managed by the CTE Programs Administrator and the AE Academic Programs Administrator. Both AE and CTE grants follow a similar process for the drafting, approval and submission of their grants to the Department.
 - O Upon completion of the grant application, the AE grant manager then proceeds to seek final approval of the grant from the assistant bureau chief of education; the bureau chief; the director of programs; and final approval is made by the bureau secretary.
 - O Similarly, the CTE grant is approved by the CTE workforce chief and program director before following the same approval process as the AE grant application.

- Once all of the programmatic needs are addressed and the grant applications are approved, the grant managers will then submit the grant applications to their FDOE grant manager.
- FDC is different from traditional providers receiving CTE grant funds in that their service area includes the entire state of Florida as opposed to the much smaller regions serviced by school districts or colleges. In addition to a state-wide service region, upon release an inmate may or may not remain with the region in which they were incarcerated.
- FDC took a comprehensive, multimodal approach to completing the Comprehensive Local Needs Assessment (CLNA); including: meetings, telephone calls, emails, and the creation and distribution of survey instruments (with various stakeholders made up of students, teachers, college faculty, businesses, business associations, statewide business associations, and state and local agencies).
- **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.
 - FDC utilizes the Offender Based Information System (OBIS) as its management information system (MIS) to house and track student data such as records, grades, and attendance. OBIS is unique in that it is a dedicated MIS used exclusively by the U.S. Department of Justice.
 - FDC has operational review standards for data collection, entry and verification. Job descriptions were also provided for those individuals who participate in these tasks within OBIS.
 - FDC provided guidelines on instructional hours, pre and post-testing of students, and how to interpret scores and assign educational functioning levels (EFL). A student's assigned functioning level determines their placement in an Adult Basic Education (ABE) program.
 - All proctors of the Tests for Adult Basic Education (TABE) are trained and certified, as required, by the state and the appropriate testing company. Certifications were verified as part of the VDMR.
 - Student electronic files include "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA).
 - Samples of AE student data were reviewed and verified for accuracy as part of the VDMR. No errors were found. All student records were provided by FDC.
- C. <u>CURRICULUM AND INSTRUCTION</u> refers to elements contributing to student learning and skill acquisition.
 - As inmates progress through the prison intake process, they are provided information about FDC's CTE course opportunities. It is also during this intake process that inmates are administered academic skills, employment needs and career interest assessments.
 - FDC offers all inmates the Florida Department of Education's Career Cruiser. The Career
 Cruiser is a career exploration resource used to promote career development. It provides selfassessment activities to assist students in thinking about the relationship between personal
 interests and career goals.
 - In 2022-2023, FDC inmate-students earned 1,206 vocation certificates and 7,786 Industry Credentials. For 2023-2024, inmate-students earned 933 vocation certificates and 10,211 Industry Credentials.
- **D.** <u>EQUAL ACCESS</u> refers to compliance with federal non-discrimination laws' requirements relating to recruitment, enrollment, participation and completion of programs.

- FDC 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.
 - All inventory criteria set forth by federal, state and local guidelines are included within the inventory management system.
 - FDC has policies and procedures on property management, equipment safety/storage and inventory disposal. Due to the unique circumstances of each Correctional Institution where services are provided, all equipment purchases must first be vetted by security staff at each location prior to beginning the procurement process.
 - FDC utilizes a "termination of property accountability" form in the event that an inventory item is unaccounted for due to loss or theft. Due to the secure nature of program sites, loss of property has always been minimal and there have been no instances of lost or stolen grantfunded inventory over the past three fiscal years.
 - FDC adheres to the state policy of "all personal property with a value of \$1,000" or more shall be included in the DOE 101 Budget Narrative. Their local financial system considers items over \$5,000 as capitalized.
 - Due to the nature of the VDMR, no onsite inventory of equipment was conducted. FDC was asked to provide images and procurement records for capitalized inventory items, and no instances of non-compliance were found.
- **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:

- Agency policies and procedures for data collection, verification and reporting
- Agency policies and procedures for finance and procurement
- Agency policies and procedures for property management
- Agency policies and procedures on TABE testing and student placement
- Grant funded purchasing card records
- Inventory records and pictures of capitalized inventory items
- Travel records and supporting documentation
- Procurement records
- CLNA and program advisory committee records agendas, sign-in sheets, etc.
- Professional development and training records agendas, sign-in sheets, training materials, etc.
- AE student data review
- TABE proctor certification 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.

- The Florida Accounting Information Resource (FLAIR) system is used as the enterprise resource planning (ERP) and general ledger accounting system.
- FDC's fiscal policies and procedures manual ensures the efficient management of CTE and AE grant funds. The following procedural manuals were reviewed:
 - Procurement thresholds
 - Methods of procurement
 - Contract management
 - Cash management

Additional procedures were presented to the monitoring staff in regards to "conflict of interest" with competitive and non-competitive solicitations of products or services.

- The AE and CTE grant managers work with the agency's grants financial specialist to ensure all expenditures are allowable by law and able to be funded with federal dollars. Meetings are also conducted monthly with the financial specialist to keep track of grant expenditures and the financial standing of their federal grant dollars. The grant managers have limited access to financial reports, but there are open lines of communication with the financial specialists to ensure that all parties involved are always in agreement with a grant's current fiscal standing.
- Purchase orders are only created and authorized for items previously approved in the FDOE federal grant application. Once a purchase has been authorized, the method of procurement is determined based on the price of the item(s). Agency policies and procedures mandate that procurement thresholds fall into one of five categories:
 - o Category one \$20,000 or less shall use good procurement practices.
 - Category two \$20,001 to \$34,999 shall require at least two written quotes or informal solicitations.
 - O Category three \$35,000 to \$64,999 shall require a formal competitive solicitation. Additional review of the purchase takes place via the agency purchasing analyst.
 - Category four \$65,000 to \$194,999 shall require legal review along with a formal competitive solicitation. Additional review of the purchase takes place via the agency purchasing manager.
 - Category five \$195,000 to \$324,999 shall require legal review along with a formal competitive solicitation. Additional review of the purchase order takes place via the agency bureau or the procurement assistant chief.
 - Anything above \$325,000 requires special approval along with legal review and a formal competitive solicitation. Additional review of the purchase takes place via the agency bureau of procurement, assistant chief and/or chief.
- Policies and procedures are also in place for the procurement of goods considered a "sole source purchase."
- All capitalized equipment purchases are "tagged" with a FDC asset identification number.
- Select program administrators do have authorized access to grant-funded purchasing cards (P-card). Policies and procedures for P-card users were submitted to the monitoring staff as part of the review.
- Monitoring staff conducted a budget analysis of FDC's Department grants. Upon review, the following non-compliance finding was discovered: Object codes were overspent with no budget amendments submitted. See Finding 1.
- **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.

- FDC has numerous collaborations, partnerships and MOUs throughout the state. They often offer additional workforce recommendations and provide crucial employment preparation skills and job placement programs for inmates upon release. The list of partners includes, but is not limited to:
 - o CareerSource Florida
 - o Florida Department of Economic Opportunity
 - o Florida Masonry Apprenticeship and Education Foundation
 - o Florida Restaurant and Lodging Association
 - o Florida Association of Cosmetology and Technical Schools
 - Northeast Builders Association
 - o Concrete Council

VIII. RESULTS

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

Finding Number	1			
Area	Finance			
Finding Summary	A grant budget analysis (GBA) was conducted for			
	FDC for all grants from 2022-2025. There were			
	errors in: Object codes were overspent with no			
	budget amendments submitted.			
Finding Detail	• FY's 2022-24			
	• CTE 2022-24			
	 Adult Education 22-23 			
	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 <u>2 CFR 200.308, (b) (c)</u>			
	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 Secretary will provide a letter of attestation			
Action	and plan of corrective action			
Anticipated completion date:	9/11/2025			
Name and Title responsible for CAP	Ricky Dixon, Secretary, FDC			
Plan Accepted by:	Chuck Davis			

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: 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 FDC monitoring review. A special thanks is offered to Ms. Diane Head and Ms. Staci Mortham for their participation during this process.

APPENDIX A

Florida Department of Education Career and Technical Education Risk Matrix

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

Agency Name: Florida Department of Corrections

Program Type: CTE

Monitoring Year: 2025-2026

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7	3	<u>X 10</u>	30
Number of Years Since Last	5-6	5			
Monitored	3-4	3			
	0-2	1			
	Upper Quartile	7			
Total Budget for all Perkins	Upper Middle	5	1 _	770	
Grants Combined	Lower Middle	3	7	<u>X8</u>	56
	Lower Quartile	1			
	4 or More	7			
Normhau of Daulius Cuanta	3	5	1	V 0	8
Number of Perkins Grants	2	3	1	<u>X 8</u>	
	1	1			
Change in Management Information Systems (MIS)	Yes	7	0	<u>X 6</u>	0
from Previous Fiscal Year	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			U
	Upper Quartile	7			1
Unexpended Funds from all	Upper Middle	5			
Perkins Grants Combined	Lower Middle	3	7	<u>X 4</u>	28
rerkins Grants Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7	0 <u>X4</u>		0
Number of Findings from the	Upper Middle	5		<u>X 4</u>	
Office of the Auditor General	Lower Middle	3			
omee of the Munitor General	Lower Quartile	1			
	0	0			
			AGENCY RISK	SCORE:	122

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

Florida Department of Corrections Adult Education Risk Matrix

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

Agency Name: Florida Department of Corrections

Program Type: **AE**

Monitoring Year: 2025-2026

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7			
Number of Years Since Last Monitored	5-6	5	3	<u>X10</u>	30
	3-4	3	3	<u>A10</u>	30
	0-2	1			
	Upper Quartile	7	7	<u>X 8</u>	56
Total Budget for all Adult	Upper Middle	5			
Education Grants Combined	Lower Middle	3			
	Lower Quartile	1			
	4 or More	7		<u>X 8</u>	8
Number of Adult Education	3	5	4		
Grants	2	3	1		
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Agency AE Program Director Change from Previous Fiscal	Yes	7	0	<u>X 6</u>	0
Year	No	0			
	Upper Quartile	7		<u>X 4</u>	28
Unexpended Funds from all	Upper Middle	5	7		
Adult Education Grants	Lower Middle	3			
Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7	0	<u>X 4</u>	0
Number of Findings from the	Upper Middle	5			
Office of the Auditor General	Lower Middle	3			
Office of the Auditor General	Lower Quartile	1			
	0	0			
	Target Not Met			<u>X 6</u>	0
	on 3 of 3	5	0 <u>X 6</u>		
	Indicators				
Adult Education Program	Target Not Met on 2 of 3 Indicators	3			
Improvement Plan (AEPIP)	Target Not Met on 1 of 3 Indicators	1			
		0			
	All targets met	U	Agency R	<u> </u>	122

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

Please address inquiries regarding this report to:

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